

File No. 231109

Committee Item No. 4

Board Item No. 26

# COMMITTEE/BOARD OF SUPERVISORS

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Date Nov 27, 2023

Board of Supervisors Meeting

Date December 5, 2023

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Completed by: Victor Young Date November 21, 2023

Completed by: \_\_\_\_\_ Date \_\_\_\_\_

1 [Administrative Code - Approval of Surveillance Technology Policy for Multiple City  
2 Departments]

3 **Ordinance approving Surveillance Technology Policy governing the use of social**  
4 **media monitoring software for the following City departments: Airport; Arts**  
5 **Commission; Assessor - Recorder Office; Asian Art Museum; City Administrator’s**  
6 **Office - 311; City Administrator’s Office - Animal Care & Control; City Administrator’s**  
7 **Office - Central Office; City Administrator’s Office - Office of Civic Engagement and**  
8 **Immigrant Affairs; City Administrator’s Office - Office of Transgender Initiatives; City**  
9 **Planning Department; Controller’s Office; Department of Building Inspection;**  
10 **Department of Children, Youth, and Their Families; Department of Early Childhood;**  
11 **Department of Emergency Management; Department of Homelessness and Supportive**  
12 **Housing; Department of Police Accountability; Department of Public Health;**  
13 **Department of Technology and SFGov/SFGovTV; Environment Department; Ethics**  
14 **Commission; Human Rights Commission; Mayor’s Office; Municipal Transportation**  
15 **Agency; Office of Economic and Workforce Development; Port of San Francisco;**  
16 **Public Utilities Commission; and Recreation and Park Department.**

17 NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.  
18 **Additions to Codes** are in *single-underline italics Times New Roman font*.  
19 **Deletions to Codes** are in *strikethrough italics Times New Roman font*.  
20 **Board amendment additions** are in double-underlined Arial font.  
21 **Board amendment deletions** are in ~~strikethrough Arial font~~.  
22 **Asterisks (\* \* \* \*)** indicate the omission of unchanged Code  
23 subsections or parts of tables.

24 Be it ordained by the People of the City and County of San Francisco:

25 Section 1. Background.

1 (a) Terms used in this ordinance shall have the meaning set forth in Administrative  
2 Code Chapter 19B (“Chapter 19B”). In particular, Section 19B.1 defines “Department” broadly  
3 to include, with certain limitations not relevant here, “any City official, department, board,  
4 commission, or other entity in the City.”

5 (b) Chapter 19B regulates City Departments’ acquisition and use of Surveillance  
6 Technology. Under Section 19B.2, a Department must obtain Board of Supervisors approval  
7 by ordinance of a Surveillance Technology Policy before: (1) seeking funds for Surveillance  
8 Technology; (2) acquiring or borrowing new Surveillance Technology; (3) using new or  
9 existing Surveillance Technology for a purpose, in a manner, or in a location not specified in a  
10 Surveillance Technology Policy ordinance approved by the Board in accordance with Chapter  
11 19B; (4) entering into agreement with a non-City entity to acquire, share, or otherwise use  
12 Surveillance Technology; or (5) entering into an oral or written agreement under which a non-  
13 City entity or individual regularly provides the Department with data or information acquired  
14 through the entity’s use of Surveillance Technology.

15 (c) Under Chapter 19B, the Board of Supervisors may approve a Surveillance  
16 Technology Policy ordinance under Section 19B.2 only if: (1) the department seeking Board  
17 approval first submits to the Committee on Information Technology (COIT) a Surveillance  
18 Impact Report for the Surveillance Technology to be acquired or used; (2) based on the  
19 Surveillance Impact Report, COIT develops a Surveillance Technology Policy for the  
20 Surveillance Technology to be acquired or used; and (3) at a public meeting at which COIT  
21 considers the Surveillance Technology Policy, COIT recommends that the Board adopt, adopt  
22 with modification, or decline to adopt the Surveillance Technology Policy for the Surveillance  
23 Technology to be acquired or used.

24 (d) Under Section 19B.4, the City’s policy is that the Board of Supervisors will approve a  
25 Surveillance Technology Policy ordinance only if the Board determines that the benefits of the

1 Surveillance Technology the ordinance authorizes outweigh its costs, that the Surveillance  
2 Technology Policy ordinance will safeguard civil liberties and civil rights, and that the uses and  
3 deployments of the Surveillance Technology under the ordinance will not be based upon  
4 discriminatory or viewpoint-based factors or have a disparate impact on any community or  
5 Protected Class.

6

7 Section 2. Surveillance Technology Policy Ordinance for Multiple Departments.

8 (a) Purpose. The City Administrator’s Office is seeking Board of Supervisors  
9 authorization under Section 19B.2 of a Surveillance Technology Policy for social media  
10 monitoring software that will be used by the following City departments: (1) Airport; (2) Arts  
11 Commission; (3) Assessor – Recorder Office; (4) Asian Art Museum; (5) City Administrator’s  
12 Office – 311; (6) City Administrator’s Office – Animal Care & Control; (7) City Administrator’s  
13 Office – Central Office; (8) City Administrator’s Office – Office of Civic Engagement and  
14 Immigrant Affairs; (9) City Administrator’s Office – Office of Transgender Initiatives; (10) City  
15 Planning Department; (11) Controller’s Office; (12) Department of Building Inspection; (13)  
16 Department of Children, Youth, and Their Families; (14) Department of Early Childhood; (15)  
17 Department of Emergency Management; (16) Department of Homelessness and Supportive  
18 Housing; (17) Department of Police Accountability; (18) Department of Public Health; (19)  
19 Department of Technology and SFGov/SFGovTV; (20) Environment Department; (21) Ethics  
20 Commission; (22) Human Rights Commission; (23) Mayor’s Office; (24) Municipal  
21 Transportation Agency; (25) Office of Economic and Workforce Development; (26) Port of San  
22 Francisco; (27) Public Utilities Commission; and (28) Recreation and Park Department  
23 (collectively, the “Departments”). Social media monitoring software allows the Departments to  
24 communicate with members of the public about City services on platforms which the public  
25 already uses and makes using social media more efficient and effective for City staff.

1 (b) Surveillance Impact Report. The Departments submitted to COIT a Surveillance  
2 Impact Report for social media monitoring software. A copy of the Surveillance Impact Report  
3 is in Board File No. 231109, and is incorporated herein by reference.

4 (c) Public Hearings. On June 8 and 15, 2023, COIT and its Privacy and Surveillance  
5 Advisory Board (“PSAB”) conducted a total of two public hearings at which they considered  
6 the Surveillance Impact Report and developed a Surveillance Technology Policy for social  
7 media monitoring software for the Departments. A copy of the Surveillance Technology  
8 Policy, Social Media Monitoring Software for the Departments (the “Social Media Monitoring  
9 Software Policy”) is in Board File No. 231109, and is incorporated herein by reference.

10 (d) COIT Recommendation. On June 15, 2023, COIT voted to recommend the Social  
11 Media Monitoring Software Policy to the Board of Supervisors for approval.

12 (e) Findings. The Board of Supervisors hereby finds that the benefits of the Social  
13 Media Monitoring Software Policy outweigh the costs and risks; that the Social Media  
14 Monitoring Software Policy will safeguard civil liberties and civil rights; and that the uses and  
15 deployments of social media monitoring software, as set forth in the Social Media Monitoring  
16 Software Policy, will not be based upon discriminatory or viewpoint-based factors or have a  
17 disparate impact on any community or Protected Class.

18 (f) Approval of Policy. The Board of Supervisors hereby approves the Social Media  
19 Monitoring Software Policy under which the Departments may possess and use social media  
20 monitoring software for the purposes and use set forth in the Social Media Monitoring  
21 Software Policy.

22  
23 Section 3. Effective Date. This ordinance shall become effective 30 days after  
24 enactment. Enactment occurs when the Mayor signs the ordinance, the Mayor returns the  
25

1 ordinance unsigned or does not sign the ordinance within ten days of receiving it, or the Board  
2 of Supervisors overrides the Mayor's veto of the ordinance.

3

4 APPROVED AS TO FORM:  
5 DAVID CHIU, City Attorney

6 By: /s/ Kate G. Kimberlin  
7 KATE G. KIMBERLIN  
8 Deputy City Attorney

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**LEGISLATIVE DIGEST**

[Administrative Code - Approval of Surveillance Technology Policy for Multiple City Departments]

**Ordinance approving Surveillance Technology Policy governing the use of social media monitoring software for the following City departments: Airport; Arts Commission; Assessor - Recorder Office; Asian Art Museum; City Administrator's Office - 311; City Administrator's Office - Animal Care & Control; City Administrator's Office - Central Office; City Administrator's Office - Office of Civic Engagement and Immigrant Affairs; City Administrator's Office - Office of Transgender Initiatives; City Planning Department; Controller's Office; Department of Building Inspection; Department of Children, Youth, and Their Families; Department of Early Childhood; Department of Emergency Management; Department of Homelessness and Supportive Housing; Department of Police Accountability; Department of Public Health; Department of Technology and SFGov/SFGovTV; Environment Department; Ethics Commission; Human Rights Commission; Mayor's Office; Municipal Transportation Agency; Office of Economic and Workforce Development; Port of San Francisco; Public Utilities Commission; and Recreation and Park Department.**

Existing Law

Administrative Code Chapter 19B ("Chapter 19B") regulates City Departments' acquisition and use of Surveillance Technology. Under Section 19B.2, a Department must obtain Board of Supervisors approval by ordinance of Surveillance Technology.

Amendments to Current Law

This ordinance seeks approval under the requirements of Chapter 19B.2 of a Surveillance Technology Policy for the use of social media monitoring software covering 28 City departments.

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# Surveillance Impact Report

Social Media Monitoring Software

Multiple Departments within the City and County of San Francisco

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As required by San Francisco Administrative Code, Section 19B, departments must submit a Surveillance Impact Report for each surveillance technology to the Committee on Information Technology ("COIT") and the Board of Supervisors.

The Surveillance Impact Report details the benefits, costs, and potential impacts associated with the Department's use of Social Media Monitoring Software, (hereinafter referred to as "surveillance technology").

This Surveillance Impact Report applies to the use of social media monitoring software and technology by the following city and county departments:

- Airport
- Arts Commission
- Assessor – Recorder Office
- Asian Art Museum
- City Administrator's Office – 311
- City Administrator's Office – Animal Care & Control
- City Administrator's Office – Central Office
- City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
- City Administrator's Office – Office of Transgender Initiatives
- City Planning Department
- Controller's Office
- Department of Building Inspection
- Department of Children, Youth, and their Families
- Department of Early Childhood
- Department of Emergency Management
- Department of Homelessness and Supportive Housing
- Department of Police Accountability
- Department of Public Health
- Department of Technology and SFGov/ SFGovTV
- Environment Department
- Ethics Commission
- Human Rights Commission
- Mayor's Office
- Municipal Transportation Agency
- Office of Economic and Workforce Development
- Port of San Francisco
- Public Utilities Commission

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## Surveillance Oversight Review Dates

PSAB Review: 06/08/2023; Recommended 06/08/2023

COIT Review: 06/15/2023; Recommended 06/15/2023

Board of Supervisors Approval: TBD



- Recreation and Park Department

### DESCRIPTION OF THE TECHNOLOGY

The Departments use the surveillance technology to communicate with members of the public about departmental programs, services, and news.

The Departments shall use the surveillance technology only for the following authorized purposes:

**Authorized Use(s):**

<i>– Publish the Department’s content on social media.</i>
<i>– Communicate with social media users about Department news and share information on services offered through various social media channels.</i>
<i>– Analyze data gathered from social media sources to optimize outreach to general public and achieve Department’s communication objectives.</i>

The technology may be deployed in the following locations, based on use case:

This technology is a software which is used by city and county staff on city-issued devices to communicate with members of the public through the Internet.

### Technology Details

This is a product description of the technology:

A social media monitoring technology is a technology from which a department can review all their social media accounts in one place, search all accounts and public content at once by typing in key words through a dashboard interface, schedule posts in advance on social media platforms and analyze the engagement with those posts. While the specific functions of each tool may vary, the technology often allows conversations to be labeled for later reference and can save content posted to social media platforms by other users. Search terms can be saved so that they can be repeated in the future, supporting customized monitoring across social media platforms.

Examples of social media monitoring technologies potentially used by the listed Departments include:

- AgoraPulse
- Archive Social
- Buffer
- Critical Mention
- Falcon/ Brandwatch
- Hootsuite

### Surveillance Oversight Review Dates

PSAB Review: 06/08/2023; Recommended 06/08/2023  
COIT Review: 06/15/2023; Recommended 06/15/2023  
Board of Supervisors Approval: TBD

## Social Media Monitoring Software

Multiple Departments within the City and County of San Francisco

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- Later.com
- Meltwater
- Meta Business Manager and Meta Business Suite
- Sendible
- Sprout Social
- Tweetdeck

This is a description of how the technology works:

To function, the surveillance technology is a social network manager that allows users to create custom views of all connected social networks. The technology can be used to post to multiple social media accounts, manage social media messaging, and coordinate the organization's social media marketing. The platform aggregates social media feeds so that content and trends can be viewed holistically.

### **Third-Party Vendor Access to Data**

All data collected or processed by the surveillance technology will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by the third-party company which provides the social media monitoring software to ensure the Department may continue to use the technology.

### **IMPACT ASSESSMENT**

The impact assessment addresses the conditions for surveillance technology approval, as outlined by the Standards of Approval in San Francisco Administrative Code, Section 19B:

1. The benefits of the surveillance technology outweigh the costs.
2. The Department's Policy safeguards civil liberties and civil rights.
3. The uses and deployments of the surveillance technology are not based upon discriminatory or viewpoint-based factors and do not have a disparate impact on any community or Protected Class.

The Department's use of the surveillance technology is intended to support and benefit the residents of San Francisco while minimizing and mitigating all costs and potential civil rights and liberties impacts of residents.

#### **A. Benefits**

The Department's use of the surveillance technology has the following benefits for the residents of the City and County of San Francisco:

### **Surveillance Oversight Review Dates**

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Benefit	Description
<b>Education</b>	The technology allows the department to inform the public about city and county – provided programs, services, facilities and or benefits using social media services that the public already uses.
<b>Community Development</b>	The technology allows the department to communicate with San Francisco residents about city and county-provided programs, services, facilities, and/or benefits. It also allows the department to gather community feedback via social media engagement by residents with the department’s social media accounts.

**B. Civil Rights Impacts and Safeguards**

The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:

- **Discrimination:** Although the information on social media websites is by default public and exists in the public sphere, there is documented evidence that shows that federal entities in the United States have used social media monitoring technologies to collect information about individuals or groups as part of investigations, sometimes without sufficient justification or oversight. These investigations can target certain ethnic groups or nationalities. If the technology is used in this way, it could lead to discriminatory outcomes.
- **Loss of Liberty & Loss of Trust:** Governments could misuse social media monitoring tools to identify and target individuals or groups expressing dissenting opinions or criticizing government policies. This could lead to unwarranted surveillance and a chilling effect on freedom of speech and expression. Additionally, this can erode trust in government.

The administrative safeguards are that the Departments will make sure that only authorized personnel have access to the surveillance technology. Access will be revoked if someone moves to a job without approved access.

The technical safeguards are that the surveillance technology access will be password protected, with passwords that comply with cybersecurity best practices. Departments will only use platforms that pass internal cybersecurity approvals. Authorized personnel will only access the technology from applications and devices approved for use by city and county cybersecurity standards.

**C. Fiscal Analysis of Costs and Benefits**

**Surveillance Oversight Review Dates**

PSAB Review: 06/08/2023; Recommended 06/08/2023  
 COIT Review: 06/15/2023; Recommended 06/15/2023  
 Board of Supervisors Approval: TBD

The Department's use of the surveillance technology yields the following business and operations benefits:

<b>Benefit</b>	<b>Description</b>
<b>Financial Savings</b>	The social media monitoring software presents financial benefits by reducing the number of staff who need to work on the Department's social media work
<b>Time Savings</b>	The social monitoring software helps the Department save time by allowing social media management with fewer staff members than would be needed if the software was not being used.

Appendix A lists the fiscal cost, such as initial purchase, personnel and other ongoing costs, for the surveillance technologies used by each department.

### **COMPARISON TO OTHER JURISDICTIONS**

The surveillance technology is currently utilized by other governmental entities for similar purposes. Other government entities have used the surveillance technology in the following way:

Social media monitoring technology has been used by many local, state and national government entities in the United States and internationally to engage their constituents and communicate effectively with them using social media platforms for engagement. Platforms such as Hootsuite and Meltwater report<sup>1</sup> that government entities and other organizations in the public sector use their services, such as Barcelona City Council, the government of British Columbia, the West Midlands Police Department, the city of Boston and the London Metropolitan Police Department.

While many government entities use these platforms to communicate quickly and effectively with constituents, social media monitoring technologies have also been used by law enforcement entities, such as the Department of Homeland Security, the Federal Bureau of Investigation, and the State Department, to gather information about social media users for

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<sup>1</sup> See Hootsuite at <https://www.hootsuite.com/industries/government> and Meltwater at <https://www.meltwater.com/en/industry/public-sector>).

### **Surveillance Oversight Review Dates**

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COIT Review: 06/15/2023; Recommended 06/15/2023

Board of Supervisors Approval: TBD

investigations<sup>2</sup>. These kinds of investigations can particularly impact immigrants to a country where they have not yet acquired citizenship<sup>3</sup>.

The effectiveness of the surveillance technology while used by government entities is determined to be the following:

Social media monitoring technologies allow for government entities to better understand social media trends, how people are communicating online about certain topics, and how they are interacting with certain accounts across the social media ecosystem. A social media monitoring technology assists its users with those goals.

Social media monitoring tools also allow government entities to quickly share important announcements, news updates, and emergency information with their communities, across platforms. This real-time communication can be particularly effective in situations where immediate action or awareness is required. Moreover, the tools offer a more time-efficient way of reaching a large audience given one post can be placed across various social media platforms, reducing the time it takes to communicate with the public.

The adverse effects of the surveillance technology while it has been used by other government entities are:

Effect	Description
Civil Rights and/or Civil Liberties Abuse	Government entities can use the tools included in social media monitoring technologies to surveil communications and investigate people in spaces of communication. These tools make it easier to search for key words and to monitor trends in speech, which could make people not want to speak freely or organize protests that are lawful.

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<sup>2</sup> See Brennan Center for Justice report at <https://www.brennancenter.org/our-work/research-reports/social-media-surveillance-us-government#:~:text=The%20Department%20of%20Homeland%20Security,to%20screening%20travelers%20and%20immigrants.>

<sup>3</sup> See ACLU report at <https://www.aclu.org/news/national-security/is-the-government-tracking-your-social-media-activity>

**Surveillance Oversight Review Dates**

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Board of Supervisors Approval: TBD

**Appendix A: Financial Information per Department**

The table below provides an estimate of the fiscal costs of the Surveillance Technology, including initial purchase, personnel cost to operate and maintain the technology, and any other ongoing costs such as annual subscriptions. All costs below are annual. There are no one-time costs identified.

**Total Annual Cost Estimate per Department**

Department	Personnel Cost (\$)	Software Cost (\$)	Total Annual Cost (\$)
<b>Airport</b>	72,000	60,000	132,000
<b>Arts Commission</b>	74,681	14,137	88,818
<b>Asian Art Museum</b>	50,000	-	50,000
<b>Assessor – Recorder Office</b>	5,127	-	5,127
<b>City Administrator’s Office – 311</b>	526,507	4,050	530,557
<b>City Administrator’s Office – Animal Care &amp; Control</b>	2,370	-	2,370
<b>City Administrator’s Office – Central Office</b>	1,982	3,450	5,432
<b>City Administrator’s Office – Office of Civic Engagement and Immigrant Affairs</b>	17,931	60	17,991
<b>City Administrator’s Office – Office of Transgender Initiatives</b>	78,310	-	78,310
<b>City Planning Department</b>	20,018	-	20,018
<b>Controller’s Office</b>	4,518	-	4,518
<b>Department of Building Inspection</b>	3,168	-	3,168
<b>Department of Children Youth and Families</b>	149,227	-	149,227
<b>Department of Early Childhood</b>	3,731	-	3,731
<b>Department of Emergency Management</b>	35,449	-	35,449
<b>Department of Homelessness and Supportive Housing</b>	29,452	-	29,452
<b>Department of Police Accountability</b>	693	-	693
<b>Department of Public Health</b>	57,585	-	57,585
<b>Department of Technology and SFGov/ SFGovTV</b>	43,501	9,300	52,801
<b>Environment Department</b>	84,517	3,210	87,727
<b>Ethics Commission</b>	12,498	-	12,498

**Surveillance Oversight Review Dates**

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Social Media Monitoring Software  
 Multiple Departments within the City and County of San Francisco

<b>Human Rights Commission</b>	44,253	-	44,253
<b>Mayor’s Office</b>	51,477	-	51,477
<b>Municipal Transportation Agency</b>	132,229	45,480	177,709
<b>Office of Economic and Workforce Development</b>	42,343	-	42,343
<b>Port of San Francisco</b>	62,750	1,788	64,538
<b>Public Utilities Commission</b>	85,518	17,268	102,786
<b>Recreation and Parks</b>	33,702	6,000	39,702
Grand Total	1,725,536	164,743	1,890,279

**Funding Source:** These costs are supported by Self-Supporting funds and the General Fund.

**Department Personnel:** The list below provides the specific personnel titles included in the personnel cost represented in the table above.

**Department Personnel Included in Cost Estimate**

<b>Airport</b>	
941, 931, 923	Managers
9254	Web Master
1312	Social Media Specialist
0932 & 0922	Customer Service Managers
	Wag Brigade staff
	Airport Museum Staff
<b>Arts Commission</b>	
1312	Public Information Officer
1314	Public Relations Officer
1840	Junior Management Assistant
1842	Management Assistant
<b>Asian Art Museum</b>	
	AAM Foundation Position
<b>Assessor – Recorder Office</b>	
1070	IT Director
<b>City Administrator’s Office – 311</b>	
1324	Customer Service Agent
1326	Customer Service Supervisors
933	Deputy Director or Call Center Manager
1822	Administrative Analyst
1053	Senior Business Analyst
<b>City Administrator’s Office – Animal Care &amp; Control</b>	
1310	Public Relations Assistant

**Surveillance Oversight Review Dates**

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 COIT Review: 06/15/2023; Recommended 06/15/2023  
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**City Administrator’s Office – Central Office**

1822 Administrative Analyst  
1823 Senior Administrative Analyst  
9251 Public Relations Manager

**City Administrator’s Office – Office of Civic Engagement and Immigrant Affairs**

1844 Senior Communications Specialist

**City Administrator’s Office – Office of Transgender Initiatives**

932 Manager IV  
1842 Management Assistant

**City Planning  
Department**

1827 Administrative Services Manager

**Controller’s Office**

922 Communications & Engagement Manager

**Department of Building Inspection**

1452 Executive Secretary II

**Department of Children Youth and Families**

9774 Senior Community Development Specialist

**Department of Early Childhood**

9774 Senior Community Development Specialist

**Department of Emergency Management**

922, 923, 931, 933 Managers  
8604 Emergency Services Coordinator IV  
8603 Emergency Services Coordinator III  
8602 Emergency Services Coordinator II

**Department of Homelessness and Supportive Housing**

1312 Public Information Officer  
1824 Principal Administrative Analyst  
953 Deputy Director III

**Department of Police Accountability**

1052 IS Business Analyst  
923 Manager II

**Department of Public Health**

1312 Public Information Officer

**Department of Technology and SFGov/ SFGovTV**

1767 Media Programming Specialist

**Environment Department**

5638 Environmental Assistant  
5642 Senior Environmental Specialist  
5640 Environmental Specialist

**Surveillance Oversight Review Dates**

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Board of Supervisors Approval: TBD



<b>Ethics Commission</b>	1052	Web Experience and Strategy Coordinator
	1230	Instructional Designer
	1823	Senior Administrative Analyst
	1824	Principal Administrative Analyst
<b>Human Rights Commission</b>	1312	Public Information Officer
	2991	Coordinator, Human Rights Commission
	923	Manager II
<b>Mayor's Office</b>	886	Mayoral Staff VI
<b>Municipal Transportation Agency</b>	9172	Manager II, MTA
	9177	Manager III, MTA
	1822	Administrative Analyst
	1314	Public Relations Officer
	1312	Public Information Officer
	1310	Public Relations Assistant
	1052	IS Business Analyst
<b>Office of Economic and Workforce Development</b>	1823	Senior Administrative Analyst
	1823	Senior Administrative Analyst
	9910	Public Service Assistant
<b>Port of San Francisco</b>	1312	Public Information Officer
<b>Public Utilities Commission</b>	1312	Public Information Officer
	9252	Communications Specialist
<b>Recreation and Parks</b>	3374	Volunteer/ Outreach Coordinator

**Surveillance Oversight Review Dates**

PSAB Review: 06/08/2023; Recommended 06/08/2023

COIT Review: 06/15/2023; Recommended 06/15/2023

Board of Supervisors Approval: TBD



# Surveillance Technology Policy

Social Media Monitoring Software

Multiple Departments within the City and County of San Francisco

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The City and County of San Francisco values privacy and protection of San Francisco residents' civil rights and civil liberties. As required by San Francisco Administrative Code, Section 19B, the Surveillance Technology Policy aims to ensure the responsible use of Social Media Monitoring Software itself as well as any associated data, and the protection of City and County of San Francisco residents' civil rights and liberties.

This Surveillance Technology Policy applies to the use of social media monitoring software and technology by the following City and County departments:

- Airport
- Arts Commission
- Assessor – Recorder Office
- Asian Art Museum
- City Administrator's Office – 311
- City Administrator's Office – Animal Care & Control
- City Administrator's Office – Central Office
- City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
- City Administrator's Office – Office of Transgender Initiatives
- City Planning Department
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- Department of Early Childhood
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- Department of Homelessness and Supportive Housing
- Department of Police Accountability
- Department of Public Health
- Department of Technology and SFGov/ SFGovTV
- Environment Department
- Ethics Commission
- Human Rights Commission
- Mayor's Office
- Municipal Transportation Agency
- Office of Economic and Workforce Development
- Port of San Francisco
- Public Utilities Commission
- Recreation and Park Department

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## Surveillance Oversight Review Dates

PSAB Review: 6/8/2023, Recommended 6/8/2023

COIT Review: 06/15/2023; Recommended 06/15/2023

Board of Supervisors Approval: TBD

## PURPOSE AND SCOPE

The Surveillance Technology Policy (“Policy”) defines the manner in which the surveillance technology will be used to support the missions of the listed departments, by describing the intended purpose, authorized and restricted uses, and requirements.

This Policy applies to all Department personnel that use, plan to use, or plan to secure Social Media Monitoring Software, (hereinafter referred to as “surveillance technology”), including employees, contractors, and volunteers. The only areas of the policy that Employees, consultants, volunteers, and vendors while working on behalf of the City with the Department are required to comply with this Policy.

This Policy applies to all Departments referenced above and where there is variance in the Policy’s requirements across Departments, that is clearly denoted. The Policy varies across Department’s within the following sections:

- Data Access ([Appendix A: Authorized Job Titles and Classification Numbers per Department](#))
- Data Sharing ([Appendix B: Internal and External Data Sharing](#))
- Data Retention ([Appendix C: Data Retention Period and Justification per Department](#))
- Compliance ([Appendix D: Compliance per Department](#))
- Public Inquiries ([Appendix E: Contact Information for Public Inquiry per Department](#))

Each section above includes reference to a corresponding appendix or set of appendices detailing the specific Policy requirements for each Department.

## POLICY STATEMENT

The authorized use of the surveillance technology for the Department is limited to the following use cases and is subject to the requirements listed in this Policy.

### Authorized Use(s):

<i>– Publish the Department’s content on social media</i>
<i>– Communicate with social media users about Department news and share information on services offered through various social media channels</i>
<i>– Analyze data gathered from social media sources and print media to assess the effectiveness of outreach and optimize messaging to the public to achieve the Department’s communication objectives</i>

Prohibited use cases include any uses not stated in the Authorized Use Case section.

Department may use information collected from technology only for legally authorized purposes and may not use that information to unlawfully discriminate against people based on race, ethnicity,

political opinions, religious or philosophical beliefs, trade union membership, gender, gender identity, disability status, sexual orientation or activity, or genetic and/or biometric data.

## **BUSINESS JUSTIFICATION**

### **Reason for Technology Use**

The surveillance technology supports the Departments' missions by allowing Departments to communicate with members of the public, including City residents, workers, and visitors, about city services on platforms which the public already uses. By employing social media monitoring technology to aggregate data and communicate across social media platforms, the technology allows Departments to quickly communicate a consistent message across platforms, respond to constituent concerns in a timely manner, use post engagement information to strategize on the most effective way to reach specific audiences, and collect vital information on the public's concerns and need for government services.

### **Description of Technology**

A social media monitoring technology is a technology from which a department can review all their social media accounts in one place, search all accounts and public content at once by typing in key words through a dashboard interface, schedule posts in advance on social media platforms and analyze the engagement with those posts. While the specific functions of each tool may vary, the technology often allows conversations to be labeled for later reference and can save content posted to social media platforms by other users. Search terms can be saved so that they can be repeated in the future, supporting customized monitoring across social media platforms.

Examples of social media monitoring technologies potentially used by the listed Departments include:

- AgoraPulse
- Archive Social
- Buffer
- Critical Mention
- Falcon/ Brandwatch
- Hootsuite
- Later.com
- Meltwater
- Meta Business Manager and Meta Business Suite
- Sendible
- Sprout Social
- Tweetdeck

### **Resident Benefits**

The social media monitoring software allows the Department to communicate with the public about services and programs offered by the Department, improving the accessibility of these services.

The distinct services provided by the Department, made more accessible through the surveillance technology, include the following benefits:

<b>Benefit</b>	<b>Description</b>
<b>Education</b>	The technology allows the department to inform the public about city and county – provided programs, services, facilities and or benefits using social media services that the public already uses.
<b>Community Development</b>	The technology allows the department to communicate with San Francisco residents about city and county-provided programs, services, facilities, and/or benefits. It also allows the department to gather community feedback via social media engagement by residents with the department’s social media accounts.

### **Department Benefits**

The surveillance technology will benefit the department in the following ways:

<b>Benefit</b>	<b>Description</b>
<b>Financial Savings</b>	The social media monitoring software presents financial benefits by reducing the number of staff assigned to the Department’s social media work.
<b>Time Savings</b>	The social monitoring software helps the Department save time by allowing social media management with fewer staff members than would be needed if the software was not being used.

### **POLICY REQUIREMENTS**

This Policy defines the responsible data management processes and legally enforceable safeguards required by the Department to ensure transparency, oversight, and accountability measures. Department use of surveillance technology and information collected, retained, processed or shared by surveillance technology must be consistent with this Policy; must comply with all City, State, and Federal laws and regulations; and must protect all state and federal Constitutional guarantees.

**Specifications:** The software and/or firmware used to operate the surveillance technology must be up to date and maintained.

<b>Data Collection:</b>	Departments shall only collect data required to execute the authorized use cases. All data collected by the surveillance technology, including PII, shall be classified according to the City’s <a href="#">Data Classification Standard</a> .
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The surveillance technology collects some or all of the following data type(s):

<i>Data Type(s)</i>	<i>Format(s)</i>	<i>Classification</i>
Social media handles, profiles, and posts (which can include name, date of birth, age, location, marital and employment status)	HTML, JPG, PNG, GIF, MOV, MP3, MP4.	Level 1-3
Biometric information, insofar that it is captured by the social media platform, e.g., Facebook and Instagram.	HTML, JPG, PNG, GIF, MOV, MP3, MP4.	Level 3

**Access:** All parties requesting access must adhere to the following rules and processes:

- **Training:** All departments will train their staff with access to the social media monitoring technology on how to properly use the technology, which will include information from the manufacturer on how to use their technology as well as information about this surveillance technology policy and the authorized use cases.
- **Documented Guidelines:** All departments will create a written social media guideline document for the reference of their employees regarding appropriate and prohibited uses, information about the data lifecycle for the technology, and a discussion of how to avoid any applicable civil liberties concerns.

#### **A. Department employees**

Once collected, only certain roles and job titles are authorized to access and use data collected, retained, processed or shared by the surveillance technology.

Each department's authorized job titles and classifications will be listed in [Appendix A: Authorized Job Titles and Classification Numbers per Department](#).

#### **B. Members of the public**

Department will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and State civil procedure laws and rules.

Collected data that is classified as Level 1-Public data may be made available for public access or release via DataSF's [Open Data](#) portal. Open Data has a Public Domain Dedication and License, and makes no warranties on the information provided. Once public on Open Data, data can be freely shared, modified, and used for any purpose without any restrictions. Any damages resulting from use of public data are disclaimed.

Members of the public may also request access by submission of a request pursuant to San Francisco's [Sunshine Ordinance](#). No record shall be withheld from disclosure in its entirety unless all information contained in it is exempt from disclosure under express provisions of the California Public Records Act or some other statute.

**Training:**

To reduce the possibility that surveillance technology or its associated data will be misused or used contrary to its authorized use, all individuals requiring access must receive training on data security policies and procedures.

Department shall require all elected officials, employees, consultants, volunteers, and vendors working with the technology on its behalf to read and confirm that they understand all authorized and prohibited uses dictated by this policy. Department shall also require that all individuals requesting data or regularly requiring data access receive appropriate training before being granted access to systems containing PII.

More specifically, Department training will include:

All department staff with authorized access to the technology will receive training on how to use the social media monitoring technology, including information on data security best practices.

**Data Security:**

Surveillance technology data collected and retained by the Department shall be protected by the safeguards appropriate for its classification level(s) as defined by the National Institute of Standards and Technology (NIST) security framework 800-53, or equivalent requirements from other major cybersecurity framework selected by the department. Access to the surveillance technology will be restricted to only necessary department personnel and will be monitored by the department for misuse, either by city and county staff or by external malicious actors.

Department shall ensure compliance with these security standards through the following:

Only necessary department personnel will have access to the social media monitoring technology login information. Only software with encryption will be

used. No sensitive information or Personally Identifiable Information (“PII”) should be solicited through the social media monitoring technology by the department.

**Data Storage:** Departments included in this policy may store information in one or more of the following ways: Cloud Storage Provider, DT Data Center, Local Storage, and/or Software as a Service.

**Data Sharing:** Departments will endeavor to ensure that other agencies or departments that may receive data collected by the surveillance technology will act in conformity with this Policy.

For internal and externally shared data, shared data shall not be accessed, used, or processed by the recipient in a manner incompatible with the authorized use cases stated in this Policy.

Department shall ensure proper administrative, technical, and physical safeguards are in place before sharing data with other CCSF departments, outside government entities, and third-party providers or vendors. (*See Data Security*)

Department shall ensure all PII and restricted data is de-identified or adequately protected to ensure the identities of individual subjects are effectively safeguarded from entities that do not have authorized access under this policy.

Further, in sharing data, processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying an individual person, data concerning health or data concerning an individual person’s sex life or sexual orientation shall be prohibited.

Each department that believes another agency or department receives or may receive data collected from its use of surveillance technologies should consult with its assigned deputy city attorney regarding their legal obligations.

Before sharing data with any recipients, the Department will use the following procedure to ensure appropriate data protections are in place:

- Confirm the purpose of the data sharing aligns with the department’s mission.
- Consider alternative methods other than sharing data that can accomplish the same purpose.
- Redact names, scrub faces, and ensure all PII is removed in accordance with the department’s data policies.

- Review of all existing safeguards to ensure shared data does not increase the risk of potential civil rights and liberties impacts on residents.



- Evaluation of what data can be permissibly shared with members of the public should a request be made in accordance with the San Francisco's [Sunshine Ordinance](#).
- Ensure data will be shared in a cost-efficient manner and exported in a clean, machine-readable format.

For specific requirements governing internal and external data sharing for each Department, see [Appendix B: Internal and External Data Sharing](#).

**Data Retention:** Department may store and retain raw PII data only as long as necessary to accomplish a lawful and authorized purpose. Department data retention standards should align with how the department prepares its financial records and should be consistent with any relevant Federal Emergency Management Agency (FEMA) or California Office of Emergency Services (Cal OES) sections.

For specific requirements governing data retention periods see [Appendix C: Data Retention Period and Justification per Department](#).

**Data Disposal:** Upon completion of the data retention period, Department shall dispose of data in the following manner:

Any file that is downloaded from the social media monitoring software must be deleted in no longer than the maximum time allowed by the retention period. A department must check for these files on a regular basis and this process must be a part of the training that department employees authorized to use the surveillance technology are given.

All materials are deleted after the requisite retention period.

## COMPLIANCE

Departments are responsible for ensuring compliance with this policy within their own Department, and across third-party entities acting on their behalf. For the specific method each Department shall employ to ensure compliance and provide oversight over the surveillance technology's use, see [Appendix D: Compliance per Department](#).

## Sanctions for Violations

If any Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, the Department shall post a notice on their Department website that generally describes any corrective measure taken to address such allegation.

Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.8.

## EXCEPTIONS

Only in exigent circumstances or in circumstances where law enforcement requires surveillance technology data for investigatory or prosecutorial functions may data collected, retained or processed by the surveillance technology be shared with law enforcement.

## DEFINITIONS

Personally-Identifiable Information: Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Raw Data: Information collected by a surveillance technology that has not been processed and cleaned of all personal identifiable information. The distribution and use of raw data is tightly restricted.

Exigent Circumstances: An emergency involving imminent danger of death or serious physical injury to any person that requires the immediate use of Surveillance Technology or the information it provides.

## AUTHORIZATION

Section 19B.4 of the City's Administrative Code states, "It is the policy of the Board of Supervisors that it will approve a Surveillance Technology Policy ordinance only if it determines that the benefits the Surveillance Technology ordinance authorizes outweigh its costs, that the Surveillance Technology Policy ordinance will safeguard civil liberties and civil rights, and that the uses and deployments of the Surveillance Technology under the ordinance will not be based upon discriminatory or viewpoint-based factors or have a disparate impact on any community or Protected Class."

## QUESTIONS & CONCERNS

### Public Inquiries

Department shall acknowledge and respond to complaints and concerns in a timely and organized response, and in the following manner: All departments will provide a phone number, email address,

and/or comments box for members of the public to submit complaints, grievances or any other public inquiries.

For specific contact information for complaints, grievances, or any other public inquiries for each department, as well as information about how the Departments will ensure each question and complaint is responded to in a timely manner, see [Appendix E: Contact Information for Public Inquiry per Department](#).

**Inquiries from City and County of San Francisco Employees**

All questions regarding this policy should be directed to the employee's supervisor or director. Similarly, questions about other applicable laws governing the use of surveillance technology or the issues related to privacy should be directed to the employee's supervisor or director.

## APPENDICES

### Appendix A: Authorized Job Titles and Classification Numbers per Department

Department Name	Job Title Authorized to Access Surveillance Technology Data
<b>Airport</b>	<p><b>Marketing Communications Team:</b>            0941 Manager VI            0931 Manager III            0923 Manager II            9254 Communications Manager            1312 Public Information Officer</p> <p><b>Customer Service Team:</b>            0932 Manager IV            0922 Manager I            1842 Management Assistant</p> <p><b>SFO Museum:</b>            0932 Manager II            3541 Curator 1</p>
<b>Arts Commission</b>	<p>1314 Public Relations Manager/Director of Communications            1312 Public Information Officer            1842 Management Assistant            1840 Management Associate</p>
<b>Assessor Recorder</b>	1070 IT Director
<b>Asian Art Museum</b>	<p>Marketing Director            Senior Digital Producer            Digital Marketing Coordinator            Business and Data Systems Analyst</p> <p>Note: All job titles listed here are Asian Art Museum Foundation job titles, which do not have classification numbers:</p>
<b>City Administrator’s Office</b>	<p><b>311 Call Center:</b>            1324 Customer Service Agent            1326 Customer Service Supervisors            0933 Deputy Director or Call Center Manager            1822 Administrative Analyst            1053 Senior Business Analyst            1054 Principal Business Analyst</p> <p><b>Animal Care and Control:</b>            1310 Public Relations Assistant            3374 Volunteer / Outreach Coordinator</p> <p><b>Central Office:</b>            1823 Senior Communications and Legislative Analyst</p>

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	9251 Director of Legislation and Public Affairs 1822 Communications and Legislative Analyst <b>Office of Civic Engagement and Immigrant Affairs:</b> 1844 Senior Management Assistant / Senior Communications Specialist <b>Office of Transgender Initiatives:</b> 0932 Manager IV 1842 Management Assistant
<b>City Planning</b>	1827 Administrative Services Manager
<b>Controller</b>	0922 Communications & Engagement Manager
<b>Department of Building Inspection</b>	1452 Executive Secretary II
<b>Department of Children, Youth, and their Families</b>	9774 Communications staff 1840 Management Analyst Series
<b>Department of Early Childhood</b>	1823 Senior Administrative Analyst 9774 Senior Community Development Specialist
<b>Department of Emergency Management</b>	8600 Emergency Services series 0900 Manager series
<b>Department of Homelessness and Supportive Housing</b>	1312 Public Information Officer 1824 Principal Administrative Analyst 0953 Deputy Director III
<b>Department of Police Accountability</b>	0923 Manager II 1052 IS Business Analyst 8126 Senior Investigator 8124 Investigator
<b>Department of Public Health</b>	1312 Public Information Officer
<b>Department of Technology and SFGov/ SFGovTV</b>	0943 Manager III 1767 Media Programming Specialist 0941 Manager VI 0933 Manager V 9252 Communications Specialist
<b>Environment</b>	

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<b>Ethics Commission</b>	5638 Environmental Assistant 5642 Senior Environmental Specialist 5640 Environmental Specialist 1052 Web Experience and Strategy Coordinator
<b>Human Rights Commission</b>	1230 Instructional Designer 1823 Senior Administrative Analyst 1824 Principal Administrative Analyst
<b>Mayor's Office</b>	1312 Public Information Officer 2991 Coordinator, Human Rights Commission 0923 Manager II
<b>Municipal Transportation Agency</b>	1767 Media Programming Specialist 0886 Mayoral Staff VI
<b>Office of Economic and Workforce Development</b>	9172 Manager II 9177 Manager III 1822 Administrative Analyst 1314 Public Relations Officer 1312 Public Information Officer 1310 Public Relations Assistant 1052 IS Business Analyst
<b>Port</b>	1823 Senior Administrative Analyst 9910 Public Service Trainee (Marketing Design Assistant)
<b>Public Utilities Commission</b>	1312 Public Information Officer
<b>Recreation and Park Department</b>	1312 Public Information Officer 9252 Communications Specialist 3374 Volunteer/ Outreach Coordinator

**Appendix B: Internal and External Data Sharing**

The following departments do not share data either internally with city and county departments or externally with entities outside of the City and County of San Francisco:

- Arts Commission
- Asian Art Museum
- Assessor – Recorder Office
- City Administrator’s Office – 311
- City Administrator’s Office -- Animal Care & Control
- City Administrator’s Office – Central Office
- City Administrator’s Office – Office of Transgender Initiatives
- City Planning Department
- Controller’s Office
- Department of Building Inspection
- Department of Children, Youth, and their Families
- Department of Early Childhood
- Department of Emergency Management
- Department of Police Accountability
- Department of Public Health
- Department of Technology and SFGov/ SFGovTV
- Environment Department
- Ethics Commission
- Human Rights Commission
- Mayor’s Office
- Municipal Transportation Agency
- Office of Economic and Workforce Development
- Port of San Francisco
- Public Utilities Commission
- Recreation and Park Department

**Internal Data Sharing**

The table below reflects Departments that share data within the City and County of San Francisco and which recipients they share with. Data is shared on an as-needed basis, with no set frequency.

Department	Data Type	Data Recipient
<b>Airport</b>	Situational awareness information (name, organization, information shared via social media.)	City Attorney, Fire Department, Police Department

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<b>Department of Homelessness and Supportive Housing</b>	images, text, social media handles, website links	City Administrator's Office, Dept of Emergency Management, Dept of Public Health Dept of Public Works Human Services Agency, Mayor's Office Public Utilities Commission
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**External Data Sharing**

The Airport is the only Department that shares surveillance inventory data with entities that are external to the City and County of San Francisco except for the Airport.

The department shares the following data with recipients outside the City and County of San Francisco whenever an event/incident or potential threat occurs:

Data Type	Data Recipient
Situational awareness information (name, organization, information shared via social media.)	Law enforcement (e.g., FBI) and Airlines, Red Cross



**Appendix C: Data Retention Period and Justification per Department**

PII data shall not be kept in a form which permits identification of data subjects for any longer than is necessary for the purposes for which the personal data are processed.

These departments report that no data is retained:

- Arts Commission
- Assessor-Recorder Office
- City Administrator’s Office -- Animal Care & Control
- City Planning Department
- Department of Building Inspection
- Department of Early Childhood
- Department of Emergency Management
- Department of Public Health
- Ethics Commission
- Office of Economic and Workforce Development
- Port of San Francisco
- Public Utilities Commission

These departments retain data:

<b>Department</b>	<b>Retention Period</b>	<b>Retention Justification</b>
<b>Airport</b>	Per the Airport Record Retention and Destruction Policy, permanent records shall be retained indefinitely. Current and storage records will be retained for a minimum of two years.	Data is stored in Archive Social which maintains this public information.
<b>Asian Art Museum</b>	Aggregate data will be preserved for up to 5 years.	The department needs to do analysis of marketing and outreach across time.
<b>City Administrator’s Office</b>	<b>311 Call Center:</b> 5 years for all service request data	<b>311 Call Center:</b> The department routinely receive data requests from the City Attorney's office and members

		of the public for data going back within the last 4 years.
	<p><b>Central Office:</b></p> <p>Per the City Administrator's Office records retention and destruction policy, permanent records shall be retained indefinitely. Current and storage records will be retained for a minimum of 2 years.</p>	<p><b>Central Office:</b></p> <p>The department retains data to understand and assess public engagement with department services and programs, and effectiveness of external communications.</p>
	<p><b>Office of Civic Engagement and Immigrant Affairs:</b></p> <p>2 years</p>	<p><b>Office of Civic Engagement and Immigrant Affairs:</b></p> <p>As a division of the City Administrator's Office, OCEIA will follow the standard of record retention, categorizing all data from Surveillance Technologies under "General Business / Administrative Records, Miscellaneous, at records retention Level 2."</p>
	<p><b>Office of Transgender Initiatives:</b></p> <p>2 years</p>	<p><b>Office of Transgender Initiatives:</b></p> <p>Per the City Administrator's Office records retention policy, OTI's data retention standard for data collected by the surveillance technology would fall under category General Business / Administrative Records, Miscellaneous, at records retention level 2.</p>

<p><b>Controller’s Office</b></p>	<p>Any data needed to establish trends and inform performance measures shall be retained indefinitely</p>	<p>It is not necessary for the department to retain media monitoring data. Media monitoring data would serve as an additional marker to help us gauge interest in our work products and serve as a benchmark for the annual performance appraisal of the department's communication team. Records older than a couple of years would be considered stale/irrelevant for these purposes.</p>
<p><b>Department of Homelessness and Supportive Housing</b></p>	<p>General/ Administrative Correspondence, miscellaneous – 2 years           General/ Administrative: Statistical – 5 years</p>	<p>The department posts and performance reports are considered business data subject to Sunshine and public records laws and are retained according to those requirements.</p>
<p><b>Department of Police Accountability</b></p>	<p>Five years – all case information except for Sustained Improper Finding/ Officer shooting Cases</p>	<p>Where federal, state, or local law prescribes a definite period of time for retaining certain records, the department will retain the records for the period specified by law. Investigations that resulted in full referrals to outside agencies due to lack of jurisdiction will be retained for the minimum period specified by law. All other investigation files, with the exception of officer-involved shooting (OIS) and sustained cases, will be retained for the later of twenty years.</p>

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 Multiple Departments within the City and County of San Francisco

	Permanent - Sustained Improper Finding/ Officer Shooting Cases	All other investigation files, with the exception of officer-involved shooting (OIS) and sustained cases, will be retained for the later of twenty years, the end of City employment for all parties, or the period specified by law. Sustained cases and OIS cases will be retained permanently.
<b>Department of Technology and SFGov/ SFGovTV</b>	2 Years	Retention period for request of any public records was ratified on 11/15/2018 in accordance with applicable public records laws. The retention period information can be found on the Department of Technology's Index of Records website for the City and County of San Francisco.
<b>Environment Department</b>	Data that is needed to establish trends shall be kept for a period of up to 5 years, unless it is no longer needed to contextualize a trend. After 5 years, the data will be eliminated, and only aggregated information will be kept.	Data is collected to learn about the department's audience and how best to engage with them. The more data available, the better equipped the department is to ascertain trends, effectiveness, and more.
<b>Human Rights Commission</b>	The department's data retention standards follow the Current record retention standard. In accordance with record retention standards as outlined in HRC department's Index to Records, or two years (retained onsite).	In accordance with record retention standards as outlined in the department's Index to Records.

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<b>Mayor’s Office</b>	2 Years	Retention period for request of any public records was ratified on 11/15/2018 in accordance with applicable public records laws. The retention period information can be found on the Department of Technology’s Index of Records website for the City and County of San Francisco.
<b>Municipal Transportation Agency</b>	We selectively retain some of the data for analytical and tracking purposes. Sprout Social stores data up to two years, which we believe is reasonable.	The 2-year data retention period is within a typical range of industry standards, which are determined by factors such as data storage costs and the frequency of data access requests.
<b>Recreation and Park Department</b>	8 years	Numerical metrics serve as an annual benchmark for the performance of the department's communication team. Note that data is anonymized with no PII.

**Exceptions to Retention Period** - PII data collected by the surveillance technology may be retained beyond the standard retention period only in the following circumstance(s):

- **Airport:** For incident investigation and/or law enforcement event support purposes and Marketing.

Departments must establish appropriate safeguards for PII data stored for longer periods.

The following departments have no exceptions to the retention period:

- Asian Art Museum
- City Administrator’s Office – 311
- City Administrator’s Office – Central Office
- City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
- City Administrator’s Office – Office of Transgender Initiatives
- Controller’s Office

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- Department of Homelessness and Supportive Housing
- Department of Police Accountability
- Department of Technology and SFGov/ SFGovTV
- Environment Department
- Human Rights Commission
- Mayor's Office
- Municipal Transportation Agency
- Recreation and Park Department

## **Appendix D: Compliance per Department**

### ***Department Compliance***

Department shall oversee and enforce compliance with this Policy using the following methods:

- Airport
  - The department will conduct an annual review of this policy and best practices to ensure compliance and will require training for all authorized personnel.
  - In addition, the department will limit access to software and data to those who need to have access to perform their roles and responsibilities, as listed in Appendix A.
- Arts Commission
  - The department will conduct an annual review of technology policy and best practices to ensure compliance and will require training for all authorized personnel.
- Assessor – Recorder Office
  - The IT team will review any data and can be reached at [asrtechsupport@sfgov.org](mailto:asrtechsupport@sfgov.org).
- Asian Art Museum
  - The marketing department will coordinate with the IT department to ensure that use of this technology complies with the policy.
- City Administrator’s Office – 311
  - Department will have a core group of managers (Deputy Director, Call Center Manager, IT Manager) that will meet on any surveillance policy issues.
- City Administrator’s Office -- Animal Care & Control
  - Only approved staff have access to the social platform utilizing the technology (FB Business). New users must be approved and trained.
- City Administrator’s Office – Central Office
  - The department’s authorized personnel, as listed in Appendix A, are responsible for ensuring all uses of Critical Mention and its associated reports and data are in compliance with the Surveillance Technology Policy.
- City Administrator’s Office - Office of Civic Engagement and Immigrant Affairs
  - The department will have personnel dedicated to the oversight and compliance of the Surveillance Technology Policy
- City Administrator’s Office – Office of Transgender Initiatives
  - The Director and Manager of Communications will be responsible for monitoring the platform to ensure that staff do not violate OTI's social media policies.
- City Planning Department
  - Personnel from the Department’s communications and administration teams will be responsible for periodically monitor all social media platforms to ensure compliance with the citywide policy. These teams will train any new staff to the team who will be utilizing the social media tools prior to access.

- Controller's Office
  - The department will have staff in the communications and administration teams ensure compliance with the citywide policy.
- Department of Building Inspection
  - The department will train authorized users of the technology on the policy and how to use the technology
- Department of Children, Youth, and their Families
  - The department's Racial Equity, Evaluation and Research team oversees and enforces compliance through training.
- Department of Early Childhood
  - Conduct annual review of STP with all employees responsible for overseeing department's social media communications and advertising.
- Department of Emergency Management
  - Through internal training.
- Department of Homelessness and Supportive Housing
  - Through training and established policies - outlining specific use cases.
- Department of Police Accountability
  - The department will have personnel responsible for oversight and compliance policies and procedures.
- Department of Public Health
  - Our social media policy is being updated with language prohibiting surveillance on all social media platforms.
- Department of Technology and SFGov/ SFGovTV
  - SFGovTV approved staff have access to the social platform utilizing the technology (Archive Social, META Business Suite). New users must be approved and trained, as well as periodically monitor all platforms to ensure compliance with citywide policy.
- Environment Department
  - The department's Policy and Outreach Team will oversee and enforce compliance with the Surveillance Technology Policy by reviewing the Policy with SFE staff on a regular basis.
- Ethics Commission
  - The department will grant specific staff access to social media monitoring tools.
- Human Rights Commission
  - Department staff will oversee and enforce compliance with the social media monitoring policy -- the primary staff member responsible for general oversight, compliance policies and procedures, and internal recordkeeping will be the 1312 - Public Information Officer.
- Mayor's Office



- SFGovTV approved staff have access to the social platform utilizing the technology (Archive Social, META Business Suite). New users must be approved and trained, as well as periodically monitor all platforms to ensure compliance with citywide policy.
- Municipal Transportation Agency
  - Through internal training of department staff.
- Office of Economic and Workforce Development
  - The department will have deliberate training and policies in place for any staff who is given permission and access to use surveillance technologies.
- Port of San Francisco
  - The Port does not download or retain any personally identifiable information from social media platforms. The Port's sole usage of these softwares is as content schedulers and to track rudimentary data on impressions and views.
- Public Utilities Commission
  - The department will have personnel responsible for oversight, compliance policies and procedures, and internal record keeping.
- Recreation and Park Department
  - The Chief Information Officer and Director of Policy and Public Affairs or designee will be responsible for enforcing the Surveillance Technology policy through recurring review to ensure data is used only for the approved use cases.

### **Interdepartmental, Intergovernmental & Non-Governmental Entity Compliance**

To ensure that entities receiving data collected by the surveillance technology comply with the Surveillance Technology Policy, Department shall:

- Airport
  - After management review of the data, consultation will also be done with Legal or follow a legally approved pre-defined process.
- Arts Commission
  - Department shall oversee and enforce compliance with this Policy using the following methods: Conduct an annual review of technology policy and practices to ensure compliance and require training for all authorized personnel.
- Assessor – Recorder Office
  - The department reports that it does not collect data.
- Asian Art Museum
  - Department shall oversee and enforce compliance with this Policy using the following methods: Conduct an annual review of technology policy and practices to ensure compliance and require training for all authorized personnel.
- City Administrator’s Office – 311

## Social Media Monitoring Software

### Multiple Departments within the City and County of San Francisco

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- The departments that we currently share data with are already part of this multi-departmental policy. For all other entities, the department will distribute the Surveillance Technology Policy (STP) and ensure compliance with periodic reviews of processes and procedures.
- City Administrator's Office -- Animal Care & Control
  - The department reports that it does not collect data.
- City Administrator's Office – Central Office
  - Communications staff will work with staff who oversee sunshine requests for the City Administrator's Central Office (admsunshinerequests@sfgov.org) to make any appropriate redactions or withholdings before sharing responsive documents with requesters.
- City Administrator's Office - Office of Civic Engagement and Immigrant Affairs
  - Ensure proper procedures, policies, and protocols are established; having dedicated personnel to ensure compliance.
- City Administrator's Office – Office of Transgender Initiatives
  - The Department will ensure proper administrative, technical, and physical safeguards are in place before sharing data with any entity (internal or external); in addition, the Department will ensure all PII and restricted data is de-identified or adequately protected in accordance with the Surveillance Technology Policy.
- City Planning Department
  - The department will not share data with any other entities.
- Controller's Office
  - This department will not share data with other entities.
- Department of Building Inspection
  - The department reports that it does not collect data.
- Department of Children, Youth, and their Families
  - The department will not share data with any entity if that data contains PII and is restricted by our data sharing agreements.
- Department of Early Childhood
  - Conduct annual review of STP with all contractors responsible for overseeing department's social media communications and advertising.
- Department of Emergency Management
  - The department does not share data outside of the department.
- Department of Homelessness and Supportive Housing
  - Ensure signature of email sharing data explicitly states this data is governed by our policy
- Department of Police Accountability

## Social Media Monitoring Software

### Multiple Departments within the City and County of San Francisco

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- The department complies with the CA Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and state civil procedure laws and rules.
- Department of Public Health
  - If we were ever to share data, we would ensure that the recipient comply with the STP.
- Department of Technology and SFGov/ SFGovTV
  - Department will ensure safeguards are in place before sharing data with any entity (internal or external), make sure proper procedures, policies, and protocols are established, and have dedicated personnel to ensure compliance.
- Environment Department
  - The departmental Policy and Outreach Teams will oversee and enforce compliance with the Surveillance Technology Policy by reviewing the Policy with SFE staff on a regular basis. SFE staff will inform external partners they work with about complying with the Surveillance Technology Policy.
- Ethics Commission
  - The department does not share data with other entities.
- Human Rights Commission
  - The department will comply with all applicable laws and ordinances with regard to collecting data for reporting, either internal or external. The department will ensure safeguards are in place before sharing data with any entity (internal or external), make sure proper procedures, policies, and protocols are established, and have dedicated personnel to ensure compliance.
- Mayor's Office
  - On behalf of the Mayor's Office, Department of Technology (particularly the SFGovTV division) will ensure safeguards are in place before sharing data with any entity (internal or external), make sure proper procedures, policies, and protocols are established, and have dedicated personnel to ensure compliance.
- Municipal Transportation Agency
  - The department does not share data with other entities.
- Office of Economic and Workforce Development
  - The department does not collect, receive or use any data that isn't already publicly available with social media software.
- Port of San Francisco
  - The department does not share data with internal or external entities.
- Public Utilities Commission
  - The Department will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, requirements of federal and state, etc.
- Recreation and Park Department

- The Chief Information Officer or designee will be responsible for enforcing the Surveillance Technology policy through recurring review of functionality and use.

### **Oversight Personnel**

Department shall be assigned the following personnel to oversee Policy compliance by the Department and third-parties:

- Airport
  - 0955 – Deputy Director V (CDTO – Chief Digital Technology Officer)
- Arts Commission
  - Department shall oversee and enforce compliance with this Policy using the following methods: Conduct an annual review of technology policy and practices to ensure compliance and require training for all authorized personnel.
- Assessor – Recorder Office
  - 1070 – IT Director
- Asian Art Museum
  - IT Director – Asian Art Museum Foundation position
- City Administrator’s Office – 311
  - 0933 - Deputy Director
  - 1044 - IT Manager
  - 0933 - Call Center Manager
- City Administrator’s Office – Animal Care & Control
  - 3374 Volunteer / Outreach Coordinator (only applies to social media platforms)
- City Administrator’s Office – Central Office
  - 9251 – Director of Legislation and Public Affairs
- City Administrator’s Office – Office of Civic Engagement and Immigrant Affairs
  - 1844 – Senior Management Assistant / Senior Communications Specialist
- City Administrator’s Office – Office of Transgender Initiatives
  - 0932 - Manager IV (Director)
  - 1842 - Management Assistant (Manager of Communications)
- City Planning Department
  - 1827 – Administrative Services Manager
- Controller’s Office
  - 0922 – Communications & Engagement Manager
- Department of Building Inspection
  - 0923 Manager II
- Department of Children, Youth, and their Families
  - 1840 series data analysts assigned by the RED team supervisor

Social Media Monitoring Software  
Multiple Departments within the City and County of San Francisco

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- Department of Early Childhood
  - 0952 Deputy Director
  - 0923 Manager II
  - 1823 Senior Administrative Analyst
  - 9774 Senior Community Development Specialist
- Department of Emergency Management
  - 0922 - External Affairs Director
- Department of Homelessness and Supportive Housing
  - 0953 Deputy Director III
- Department of Police Accountability
  - 1052 – IS Business Analyst
  - 0923 – Manager II
- Department of Public Health
  - 1314 - Public Relations Officer
- Department of Technology and SFGov/ SFGovTV
  - 1767 - Media Programming Specialist
- Environment Department
  - 0922 - Manager I
  - 5640 - Environmental Spec
  - 1543 - Secretary, Comm on the Environment
  - 5638 - Environmental Assistant
  - 1823 - Senior Administrative Analyst
  - 1094 - IT Operations Support Admin IV
  - 5642 - Sr. Environmental Spec
  - 1052 - IS Business Analyst
  - 5638 - Environmental Assistant
- Ethics Commission
  - 1054 - Director of Technology Services
  - 1053 - Senior IS Analyst
  - 1052 - IS Business Analyst
- Human Rights Commission
  - 1312 - Public Information Officer
  - 2991 - Coordinator, Human Rights Commission
  - 0923 - Manager II
- Mayor's Office
  - 1767 - Media Programming Specialist
  - 0886 - Mayoral Staff VI
- Municipal Transportation Agency
  - 9177 - Manager III

- 9172 - Manager II
- Office of Economic and Workforce Development
  - 1823 - Senior Administrative Analyst
- Port of San Francisco
  - 1312 - Public Information Officer
- Public Utilities Commission
  - 9252 - Communications Specialist
- Recreation and Park Department
  - 0941 - Chief Information Officer or designee;
  - 0953 - Director of Policy and Public Affairs

**Sanctions for Violations** - Sanctions for violations of this Policy include the following:

- Airport
  - Follow the Airport's Data Breach rules.
- Arts Commission
  - If a Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, Department shall post a notice on the Department's website that generally describes any corrective measure taken to address such allegation.

Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.

- Assessor – Recorder Office
  - While we do not store PII data, if we did have a breach, IT would review policy with violator (1<sup>st</sup> breach), IT will escalate to HR (second breach) and IT will escalate to Assessor (third breach).
- Asian Art Museum
  - First Offence: IT Director will work with Department head of violator to review policy and remediate issues.; Second Offence: IT Director will escalate issue to HR.; Third Offence: IT Director will coordinate with HR to escalate to our Director.
- City Administrator's Office – 311
  - First offense: verbal conference, review the surveillance technology policy especially sanctions section, send copy via email; Second offense: written disciplinary action, review the surveillance technology policy especially sanctions section again; Third offense: removal of access to the social media software.
- City Administrator's Office – Animal Care & Control

- Staff working on the social media platform using this technology would be removed from their role as an admin if they misuse data collected through analytics.
- City Administrator's Office – Central Office
  - - First violation: Employee is required to sign that they have reviewed and understand the Surveillance Technology Policy.
  - Second violation: Employee is required to sign that they have reviewed and understand the Surveillance Technology Policy. Violation is sent to the employee's supervisor.
  - Third violation: Employee is required to sign that they have reviewed and understand the Surveillance Technology Policy. Violation is sent to the employee's supervisor and submitted to ADM Human Resources for inclusion in the employee's personnel file
- City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
  - Sanctions for policy violations will follow this process:
    - First Offense: Staff who use the platform inappropriately will receive initial guidance/counseling on appropriate use of technologies within the department.
    - Second Offense: Staff will have a meeting with their supervisor about the violation, and be put on probation for 3 months from using the technology/platform.
    - Third Offense: Staff will be prohibited from using the technology/platform.
- City Administrator's Office – Office of Transgender Initiatives
  - Sanctions for violations of this Policy include the following:
    - First Offense: Staff who use the platform inappropriately will receive initial counseling on appropriate use of social media within the organization.
    - Second Offense: Staff will be put on probation for 3 months from using the platform.
    - Third Offense: Staff will be prohibited from using the platform.
- City Planning Department
  - The personnel will notify the Department Information Security Officer and the Department's Human Resources Manager, and documenting the amount of offenses if a violation were to occur. The Department will follow its standard HR policy protocol depending on the amount of offenses.
- Controller's Office
  - The department will follow a series of progressive coaching in the case of a violation, to ensure staff fully understand and adhere to the policy.
- Department of Building Inspection
  - Sanctions for violations of this Policy include the following:
    - First Offense: Staff who use the platform inappropriately will receive initial counseling on appropriate use of social media within the organization.
    - Second Offense: Staff will be put on probation for 3 months from using the platform.
    - Third Offense: Staff will be prohibited from using the platform.

- Department of Children, Youth, and their Families
  - First Offense: Staff who use the platform inappropriately will receive initial counseling on appropriate use of social media within the organization.  
Second Offense: Staff will be put on probation for 3 months from using the platform.  
Third Offense: Staff will be prohibited from using the platform.  
If the Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, Department shall post a notice on the Department's website that generally describes any corrective measure taken to address such allegation.  
Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.8.
- Department of Early Childhood
  - The sanctions would be progressive discipline and the step taken would be based on a case-by-case basis regarding the severity of the violation.
- Department of Emergency Management
  - The response from the department will vary depending on the severity of the infraction or violation.
- Department of Homelessness and Supportive Housing
  - First Offense: Staff who use the platform inappropriately will receive initial counseling on appropriate use of social media within the organization.  
Second Offense: Staff will be put on probation for 3 months from using the platform.  
Third Offense: Staff will be prohibited from using the platform.  
If the Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, Department shall post a notice on the Department's website that generally describes any corrective measure taken to address such allegation.  
Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.8.
- Department of Police Accountability
  - First Offense: Retraining and Verbal Warning  
  
Second Offense: Discipline up to Written reprimand and Retraining  
  
Third Offense: Access revoked and Discipline up to termination.  
  
Per City and County of San Francisco rules, the department would sanctions employees for violations/misconduct of the Surveillance Technology Policy via progressive and just cause discipline according to negotiated labor contracts and constitutional due process requirements.



- Department of Public Health
  - The Department shall oversee and enforce compliance with this Policy using the following methods:
    - The Public Relations Officer and Public Information Officer will be responsible for monitoring the platform to ensure that staff do not violate the DPH's social media policies.
    - Department shall be assigned the following personnel to oversee Policy compliance by the Department and third-parties:
      - 1314 - Public Relations Officer
  - Sanctions for violations of this Policy include the following:
    - First Offense: Staff who use the platform inappropriately will receive initial counseling on appropriate use of social media within the organization. The Communications team will also send periodic reminders to staff on best practices regarding appropriate use.
    - Second Offense: Staff will be put on probation for 3 months from using the platform.
    - Third Offense: Staff will be prohibited from using the platform.
  - If a Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, Department shall post a notice on the Department's website that generally describes any corrective measure taken to address such allegation.
  - Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.8.
- Department of Technology and SFGov/ SFGovTV
  - Per City and County of San Francisco rules, the department would sanction employees for violations/misconduct of the Surveillance Technology Policy via progressive and case-by-case basis regarding the severity of the violation.
- Environment Department
  - Per City and County of San Francisco rules, the department would sanction employees for violations/misconduct of the Surveillance Technology Policy via progressive and just cause discipline according to negotiated labor contracts and constitutional due process requirements.
- Ethics Commission
  - The sanctions would be progressive discipline and the step taken would be based on a case-by-case basis regarding the severity of the violation.
- Human Rights Commission

## Social Media Monitoring Software

### Multiple Departments within the City and County of San Francisco

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- The department would sanction employees for violations/misconduct of the Surveillance Technology Policy via progressive and case-by-case basis regarding the severity of the violation
- Mayor's Office
  - Per City and County of San Francisco rules, the department would sanction employees for violations/misconduct of the Surveillance Technology Policy via progressive and case-by-case basis regarding the severity of the violation.
- Municipal Transportation Agency
  - Standard disciplinary procedures would be followed according to the nature of the violation and the classification of the employee.
- Office of Economic and Workforce Development
  - The department will follow standard HR procedures based on the violating employee's role, classification, and type of infraction.
- Port of San Francisco
  - The Port would defer to COIT regarding any governance policies of technology usage.
- Public Utilities Commission
  - All sanctions for guidance will be in accordance with the SFPUC HRS performance management program.
- Recreation and Park Department
  - Violation of the policy will be subject to standard departmental policies, which may include disciplinary action up to and including termination.

If a Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, Department shall post a notice on the Department's website that generally describes any corrective measure taken to address such allegation.

Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.8.

## Appendix E: Contact Information for Public Inquiry per Department

The public can contact departments to submit complaints, concerns or questions in the following way:

- Airport
  - Complaints, concerns or questions can be submitted to:  
*Airport Guest Services* - [\*https://www.flysfo.com/contact-sfo\(Contact SFO\)\*](https://www.flysfo.com/contact-sfo(Contact SFO))  
*Airport public email, phone, or website* --[\*https://www.flysfo.com/contact-sfo or\*](https://www.flysfo.com/contact-sfo or)  
Complete our online contact form: [\*https://support.flysfo.com/hc/en-us/requests/new\*](https://support.flysfo.com/hc/en-us/requests/new)  
Call Customer Service: 800.435.9736 or 650.821.8211  
Email: [\*marcom@flysfo.com\*](mailto:marcom@flysfo.com)  
Or write:  
San Francisco International Airport  
Attn: Director of Marketing & Communications  
Social Media Monitoring Policy  
PO Box 8097  
San Francisco, CA 94128-8097  
[\*https://www.flysfo.com/about-sfo/airport-commission/addressing-the-commission\*](https://www.flysfo.com/about-sfo/airport-commission/addressing-the-commission)
- Arts Commission
  - All questions regarding this policy should be directed to the Director of Communications by emailing [\*art-info@sfgov.org\*](mailto:art-info@sfgov.org) or by calling 415-252-2266.
- Assessor – Recorder Office
  - Email to [\*ASRTechsupport@sfgov.org\*](mailto:ASRTechsupport@sfgov.org)
- Asian Art Museum
  - Online contact form at [\*https://asianartmuseum.wufoo.com/forms/contact-us/\*](https://asianartmuseum.wufoo.com/forms/contact-us/), by phone at 415.581.3500, or by email at [\*mediarelations@asianart.org\*](mailto:mediarelations@asianart.org) or in person contact at 200 Larkin Street
- City Administrator’s Office – 311
  - The public can contact us by calling 3-1-1 within San Francisco or 415-701-2311. There is also an online contact form at [\*https://sf311.org/services/feedback\*](https://sf311.org/services/feedback)
- City Administrator’s Office -- Animal Care & Control
  - They can send a written complaint to our general mailbox: [\*acc@sfgov.org\*](mailto:acc@sfgov.org)
- City Administrator’s Office – Central Office
  - Members of the public should submit comments or concerns to [\*city.administrator@sfgov.org\*](mailto:city.administrator@sfgov.org).
- City Administrator’s Office – Office of Civic Engagement and Immigrant Affairs
  - Email: [\*civic.engagement@sfgov.org\*](mailto:civic.engagement@sfgov.org)
  - Phone: 415-581-2360
- City Administrator’s Office – Office of Transgender Initiatives
  - Members of the public can register complaints, concerns, and submit questions in writing via OTI's general email inbox at [\*transcitysf@sfgov.org\*](mailto:transcitysf@sfgov.org). All questions and

concerns will be forwarded to the Manager of Communications and the OTI Director for appropriate and timely response.

- City Planning Department
  - Members of the public can submit complaints to the Department via email at [planningnews@sfgov.org](mailto:planningnews@sfgov.org) or by calling 628.652.7600.
- Controller's Office
  - Email: [controller@sfgov.org](mailto:controller@sfgov.org)
  - Submit public requests via NextRequest: <https://sanfrancisco.nextrequest.com/requests/new>
- Department of Building Inspection
  - Email [dbi.communications@sfgov.org](mailto:dbi.communications@sfgov.org).
- Department of Children, Youth, and their Families
  - The public can contact the department via the normal Sunshine Ordinance request process or contacting the Racial Equity, Evaluation and Research staff via email at [info@dcyf.org](mailto:info@dcyf.org) or by phone at 628-652-7100.
- Department of Early Childhood
  - Email [dec.publicrecords@sfgov.org](mailto:dec.publicrecords@sfgov.org).
- Department of Emergency Management
  - Members of the public can contact the department by email at [dem.communityaffairs@sfgov.org](mailto:dem.communityaffairs@sfgov.org).
- Department of Homelessness and Supportive Housing
  - The public can contact the department via email - [HSHExternalAffairs@sfgov.org](mailto:HSHExternalAffairs@sfgov.org) or by phone at 628-652-7700.
- Department of Police Accountability
  - The public can contact the department via email at [sfdpa@sfgov.org](mailto:sfdpa@sfgov.org).
- Department of Public Health
  - The Public Health department utilizes the city's customer service system, 311, for all complaints and inquiries. An inquiry can be made by phone by calling 3-1-1 or by going to <https://sf311.org/home>.
- Department of Technology and SFGov/ SFGovTV
  - Members of the public can register complaints, concerns, and submit questions in writing via SFGovTV's general email inbox at [sfgovtv@sfgov.org](mailto:sfgovtv@sfgov.org).
- Environment Department
  - Members of the public can register complaints or concerns, or submit questions about the deployment of the Surveillance Technology by contacting the Environment Department (emailing [environment@sfgov.org](mailto:environment@sfgov.org); calling 415.355.3700; or coming to the SFE office at 1155 Market St. 3rd Fl.)
- Ethics Commission

- The public can contact the Ethics Commission at [ethics.commission@sfgov.org](mailto:ethics.commission@sfgov.org) or 415-252-3100.
- Human Rights Commission
  - Members of the public who have questions, complaints, or concerns about the HRC's Surveillance Technology Policy should email the HRC via [hrc.info@sfgov.org](mailto:hrc.info@sfgov.org), or call 415-252-2500, to register their question, complaint, or concern.
- Mayor's Office
  - Members of the public can register complaints, concerns, and submit questions in writing via SFGovTV's general email inbox at [sfgovtv@sfgov.org](mailto:sfgovtv@sfgov.org).
- Municipal Transportation Agency
  - Phone: 3-1-1
  - Website link to comment box: <https://sf311.org/services/feedback> or <https://www.sfmta.com/getting-around/muni/muni-feedback>
- Office of Economic and Workforce Development
  - The public can email the department via [owwd@sfgov.org](mailto:owwd@sfgov.org).
- Port of San Francisco
  - The public can contact the department by email via [communications@sfport.com](mailto:communications@sfport.com).
- Public Utilities Commission
  - The public can contact the department by email via [socialanddigitalcommunications@sfgov.org](mailto:socialanddigitalcommunications@sfgov.org).
- Recreation and Park Department
  - Members of the public may register complaints or concerns or submit questions about the deployment of the Surveillance Technology via written correspondence to McLaren Lodge in Golden Gate Park, 501 Stanyan Street, San Francisco 94117; the department's main telephone line at 415-831-2700; or email at [rpdinfo@sfgov.org](mailto:rpdinfo@sfgov.org); or via 311.

This information details how the Departments will ensure each question and complaint is responded to in a timely manner:

- Airport
  - Department shall acknowledge and respond to complaints and concerns in a timely and organized response. Generally, this will be by the end of the next business day. To do so, Department shall follow its process where questions and complaints are tracked by Airport Guest Services and response are promptly responded to by the Director of Guest Experience and/or his staff.
  - Generally, by the end of the next business day.
- Arts Commission
  - Department shall acknowledge and respond to complaints and concerns in a timely and organized response, and in the following manner: For public records requests, agency will conduct a search for, compile and release any responsive records identified

related to inquiries and requested information. The Sunshine Ordinance requires departments to respond as soon as possible or within 10 calendar days from receipt of any records requests, as permitted by San Francisco Administrative Code § 67.21(b) and California Government Code § 6253(c).

- Assessor – Recorder Office
  - The department’s public service team handles all complaints.
- Asian Art Museum
  - The department’s response will be as soon as possible or within 10 days.
- City Administrator’s Office – 311
  - 311 Customer Service Reps as well as Admin Staff have existing processes to escalate any media/data requests to 311 management in the form of a service request. All requests are tracked within our CRM system. These existing processes will also include Social Media monitoring. A report containing all open requests is emailed to 311 management every 3 hours and we will respond within five business days.
- City Administrator’s Office -- Animal Care & Control
  - Our agency responds to all questions and complaints in a timely manner as most are animal-related and require prompt action. We have sufficient staff checking our general mailbox daily to ensure this.
- City Administrator’s Office – Central Office
  - Staff assigned to oversee the city.administrator@sfgov.org account will forward questions or complaints to the Director of Legislation and Public Affairs for timely response.
- City Administrator’s Office – Office of Civic Engagement and Immigrant Affairs
  - The department will have personnel dedicated to responding to the complaints received about the Surveillance Technology Policy.
- City Administrator’s Office – Office of Transgender Initiatives
  - Department will acknowledge and respond to complaints and concerns in a timely and organized manner, by monitoring social media portals regularly. Members of the public will receive a response within 72 business hours.
- City Planning Department
  - The Department has a standard 48-hour policy for all staff in responding to any inquiry it receives from members of the public. The personnel assigned to oversee the policy compliance will monitor and respond to any question or complaint following the Department’s response policy.
- Controller’s Office
  - Personnel regularly monitor the portals where these questions/complaints would be submitted.
- Department of Building Inspection

## Social Media Monitoring Software

### Multiple Departments within the City and County of San Francisco

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- 48 hours response policy
- Department of Children, Youth, and their Families
  - The department uses the Sunshine Ordinance process/timing for responding to requests. It is within 48 hours for normal business days, Monday through Friday.
- Department of Early Childhood
  - The department will monitor the email address provided daily.
- Department of Emergency Management
  - Monitoring messages will be assigned to a specific team and a response will be given within one to three business days.
- Department of Homelessness and Supportive Housing
  - All messages are responded to within 48 - 72 business hours.
- Department of Police Accountability
  - The email is monitored daily by Operations Director and members of the department's Legal Team.
- Department of Public Health
  - SF Public Health responds to 311 questions on a weekly basis.
- Department of Technology and SFGov/ SFGovTV
  - All messages are responded to within 48 to 72 business hours.
- Environment Department
  - The department will ensure each question and complaint is responded to in a timely manner by being routed to the department's policy team.
- Ethics Commission
  - Staff will track requests via support tickets.
- Human Rights Commission
  - The department will respond to each inquiry to the general email inbox or telephone line within two business days.
- Mayor's Office
  - All messages are responded to within 48 - 72 business hours.
- Municipal Transportation Agency
  - Such complaints will be reviewed and addressed through our existing 311 queues managed by our Customer Communications team.
- Office of Economic and Workforce Development
  - Administrative staff overseeing the inboxes will be asked to forward complaints to multiple staff, including the COO, Comms Director, and HR Director.
- Port of San Francisco
  - Complaints received will be logged and tracked to ensure a response is provided to any inquiries received.
- Public Utilities Commission

- We will respond within 5 business days to each question and complaint. This will be included in the compliance policy.
- Recreation and Park Department
  - Calls, emails, written correspondence and 311 requests regarding the surveillance technology policy are routed to the department's information technology division's HelpDesk and logged in the department's request management system. Once a request is logged, the information technology division will work with relevant parties to resolve the issue. Review of open/closed requests occurs with the department's Chief Information Officer on a weekly basis.





# Committee on Information Technology

Office of the City Administrator

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To: Members of the Board of Supervisors

From: Jillian Johnson, Director, Committee of Information Technology

Date: October 4, 2023

Subject: Multidepartmental Surveillance Technology Policy for Social Media Monitoring Software

In compliance with Section 19B of the City and County of San Francisco's Administrative Code, the Committee of Information Technology, a division of the City Administrator's Office, is pleased to submit the attached Surveillance Technology Policy for Social Media Monitoring Software to the Board of Supervisors for their review and approval, on behalf of the following departments:

- Airport
- Arts Commission
- Assessor – Recorder Office
- Asian Art Museum
- City Administrator's Office – 311
- City Administrator's Office – Animal Care & Control
- City Administrator's Office – Central Office
- City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
- City Administrator's Office – Office of Transgender Initiatives
- City Planning Department
- Controller's Office
- Department of Building Inspection
- Department of Children, Youth, and Families
- Department of Early Childhood
- Department of Emergency Management
- Department of Homelessness and Supportive Housing
- Department of Police Accountability
- Department of Public Health
- Department of Technology and SFGov/ SFGovTV
- Environment Department
- Ethics Commission
- Human Rights Commission
- Mayor's Office
- Municipal Transportation Agency
- Office of Economic and Workforce Development
- Port of San Francisco
- Public Utilities Commission, and
- Recreation and Park Department.

## **Background**

To engage the public in discussion on the role of government surveillance, the Committee on Information Technology (COIT) and its subcommittee the Privacy and Surveillance Advisory Board (PSAB) held 2 public meetings for Social Media Monitoring Software during June 2023 to review and approve the policy. All details of these discussions are available online at [sf.gov/coit](https://sf.gov/coit).

After these meetings, the Committee on Information Technology staff made non-substantive corrections at the request of the Environment Department. These edits include adding three additional job titles to the authorized job titles and personnel cost tables (both found in the Appendix A sections of the Policy and Impact Report) and correcting the floor number in the address for the department in Appendix E in the Policy.

This memo provides details on the review process for the Surveillance Technology Policy, and additional information on COIT's recommendation of approval.

## **Recommendation**

COIT recommends approval of Social Media Monitoring Software Surveillance for the departments and specific uses listed in the attached policy:

- Airport
- Arts Commission
- Assessor – Recorder Office
- Asian Art Museum
- City Administrator's Office – 311
- City Administrator's Office – Animal Care & Control
- City Administrator's Office – Central Office
- City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
- City Administrator's Office – Office of Transgender Initiatives
- City Planning Department
- Controller's Office
- Department of Building Inspection
- Department of Children, Youth, and Families
- Department of Early Childhood
- Department of Emergency Management
- Department of Homelessness and Supportive Housing
- Department of Police Accountability
- Department of Public Health
- Department of Technology and SFGov/ SFGovTV
- Environment Department
- Ethics Commission
- Human Rights Commission
- Mayor's Office
- Municipal Transportation Agency
- Office of Economic and Workforce Development
- Port of San Francisco
- Public Utilities Commission, and

- Recreation and Park Department

Please feel free to contact Jillian Johnson, Director of the Committee on Information Technology (COIT) at [Jillian.Johnson@sfgov.org](mailto:Jillian.Johnson@sfgov.org) with any questions.

## Social Media Monitoring Software

Departments	Authorized Uses
<ul style="list-style-type: none"> <li>• Airport</li> <li>• Arts Commission</li> <li>• Assessor – Recorder Office</li> <li>• Asian Art Museum</li> <li>• City Administrator’s Office – 311</li> <li>• City Administrator’s Office – Animal Care &amp; Control</li> <li>• City Administrator’s Office – Central Office</li> <li>• City Administrator’s Office – Office of Civic Engagement and Immigrant Affairs</li> <li>• City Administrator’s Office – Office of Transgender Initiatives</li> <li>• City Planning Department</li> <li>• Controller’s Office</li> <li>• Department of Building Inspection</li> <li>• Department of Children, Youth, and Families</li> <li>• Department of Early Childhood</li> <li>• Department of Emergency Management</li> <li>• Department of Homelessness and Supportive Housing</li> <li>• Department of Police Accountability</li> <li>• Department of Public Health</li> <li>• Department of Technology and SFGov/ SFGovTV</li> <li>• Environment Department</li> <li>• Ethics Commission</li> <li>• Human Rights Commission</li> <li>• Mayor’s Office</li> <li>• Municipal Transportation Agency</li> <li>• Office of Economic and Workforce Development</li> <li>• Port of San Francisco</li> <li>• Public Utilities Commission</li> <li>• Recreation and Park Department</li> </ul>	<ol style="list-style-type: none"> <li>1. Publish the Department’s content on social media.</li> <li>2. Communicate with social media users about Department news and share information on services offered through various social media channels.</li> <li>3. Analyze data gathered from social media sources and print media to assess the effectiveness of outreach and optimize messaging to the public to achieve the Department’s communications objectives.</li> </ol>

Social Media Monitoring Software Public Meeting Dates

<b>Date</b>	<b>Meeting</b>
June 8, 2023	Privacy and Surveillance Advisory Board (PSAB)
June 15, 2023	Committee on Information Technology (COIT)

COIT recommends approval of the Multidepartmental Social Media Monitoring Policy.

BOARD of SUPERVISORS



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## MEMORANDUM

TO: All City Department Heads via Tom Paulino, Mayor's Office  
Linda Gerull, Executive Director, Department of Technology

FROM: Victor Young, Assistant Clerk

A handwritten signature in cursive script that reads "Victor Young".

DATE: November 7, 2023

SUBJECT: LEGISLATION INTRODUCED

The Board of Supervisors' Rules Committee received the following proposed legislation:

### **File No. 231109**

**Ordinance approving Surveillance Technology Policy governing the use of social media monitoring software for the following City departments: Airport; Arts Commission; Assessor - Recorder Office; Asian Art Museum; City Administrator's Office - 311; City Administrator's Office - Animal Care & Control; City Administrator's Office - Central Office; City Administrator's Office - Office of Civic Engagement and Immigrant Affairs; City Administrator's Office - Office of Transgender Initiatives; City Planning Department; Controller's Office; Department of Building Inspection; Department of Children, Youth, and Their Families; Department of Early Childhood; Department of Emergency Management; Department of Homelessness and Supportive Housing; Department of Police Accountability; Department of Public Health; Department of Technology and SFGov/SFGovTV; Environment Department; Ethics Commission; Human Rights Commission; Mayor's Office; Municipal Transportation Agency; Office of Economic and Workforce Development; Port of San Francisco; Public Utilities Commission; and Recreation and Park Department.**

If you have comments or reports to be included with the file, please forward them to me at the Board of Supervisors, City Hall, Room 244, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102 or by email at: [victor.young@sfgov.org](mailto:victor.young@sfgov.org).

cc. Karen Hong Yee, Dept. Of Technology  
Andres Power, Mayor's Office