

Audit of Electronic Communication Devices For Bias

First Quarter 2022



CITY & COUNTY OF SAN FRANCISCO

Police Department

05.11.2022

Purpose

The Internal Affairs Division (IAD) has reviewed and submitted the audit results for the First Quarter, 2022.

The San Francisco Police Department's continues it's ongoing efforts to ensure organizational integrity regarding the potential for bias in Department-issued communication devices.

Purpose

Transparency: All members are aware the Department's electronic communication devices and systems are audited and they do not have an expectation of privacy.

The Department's policies concerning the use of communication devices and systems are documented in several written directives:

- Department General Order 10.08 – Use of Computers and Peripheral Equipment
- Department Bulletin 19-051 – SFPD Members' Expectation of Privacy – Use of Computers, Peripheral Equipment and Facilities
- Department Bulletin 20-070 – Department Email Policy & Procedures
- Internal Affairs Bureau Order 18-02

Purpose

It is important to note the audits are limited to devices the Department owns and/or issues to our members.

Off-Duty and external social media posts are not audited, however, because they are public facing, the Department has other means of receiving complaints (i.e., from the public or internally from other members) which are then investigated by the Internal Affairs Division.

Procedure

The audit process, due to system/tech limitations, does not read the context of the words, as a result, false-positive hits may be generated.

To validate the hit, the entire entry, e-mail message, or text that contains one of the words is thoroughly reviewed by IAD investigators to determine the context in which the term was used.

Those hits determined to be potentially biased are fully investigated, and all others (false-positive hits) are archived.

Procedure

IAD investigators conduct investigations into the context of hits determined to be potentially biased. If, during the course of this initial investigation, the IAD investigators determine the hit to be an indication of bias, a full Internal Affairs investigation is initiated after consultation with the Officer in Charge of IAD.

Other allegations of misconduct may also arise from an initial investigation into a potential bias hit, even if the hit is determined to be a false positive. IAD investigators would then conduct a full Internal Affairs investigation into any and all related allegations.

Procedure

There are three platforms which are monitored for potential racial and other biases using a word list developed by the Department's Chief Information Officer and Risk Management Office.

- **Level II (CLETS)**
 - Computer terminal entries
- **Department E-mail**
 - Messages sent and received via Department e-mail addresses
- **Text Messages**
 - Messages sent and received via Department-issued cellular phones

Level II: California Law Enforcement Telecommunications System (CLETS)

A program was established which searches all entries made into this system using an established word list. The audit process is passive in nature and runs continuously.

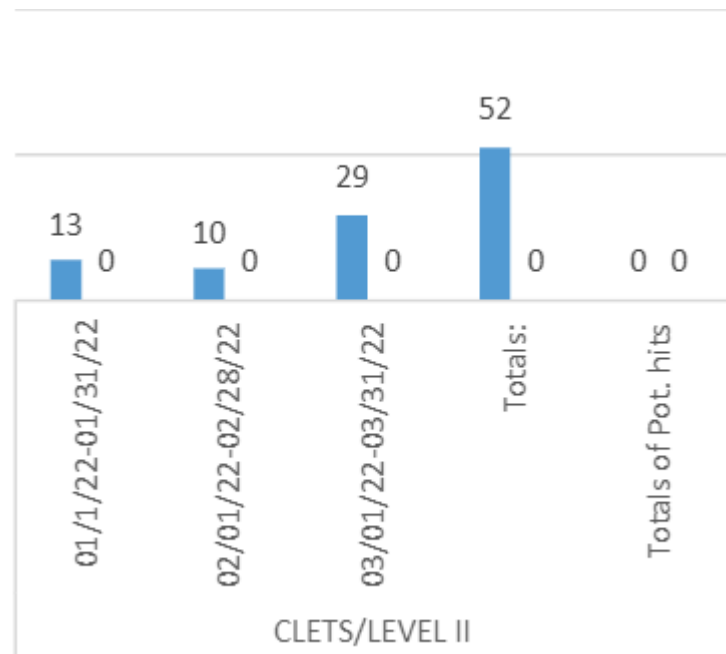
If a member uses one of the identified words, a “hit” is automatically generated and sent to IAD investigators via the Level II access portal.

Each hit is saved to a file. IAD investigators analyze every hit throughout the week and those determined to be potentially biased are investigated.

Level II: California Law Enforcement Telecommunications System (CLETS)

First Quarter Results

CLETS/LEVEL II	01/1/22-01/31/22	13
	02/01/22-02/28/22	10
	03/01/22-03/31/22	29
	Totals:	52
	Totals of Pot. hits	0



There were 52 hits returned and analyzed; **none** were determined to be potentially biased.

Department E-mail

All e-mails sent and received (internally and externally) through the Department's server are audited using an established word list. The audit process is passive in nature.

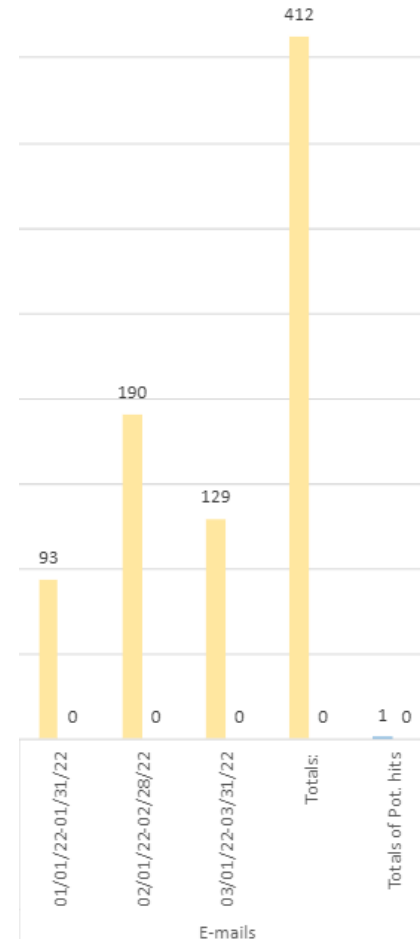
If an e-mail contains one of the identified words on the list, a "hit" is automatically generated and sent to IAD investigators via an e-mail address used for this audit process.

Each hit is saved and maintained on the server. IAD investigators analyze every hit and those determined to be potentially biased are investigated.

Department E-mail

First Quarter Results

E-mails	01/01/22-01/31/22	93
	02/01/22-02/28/22	190
	03/01/22-03/31/22	129
	Totals:	412
	Totals of Pot. hits	1



There were 412 hits returned and analyzed; **one (1)** was determined to be potentially biased.

Department E-mail

There was a large volume of false-positive e-mail hits for a word utilized in hyperlinks and embedded in Information Technology (IT)-related email signature lines.

There was one potentially biased e-mail hit which was investigated by IAD investigators. The IAD investigators conducted an initial investigation into the context of the hit and determined the hit was a false positive.

Text Messages via Department-Issued Cellular Phones

Audits of text messages sent and received (internally and externally) via each Department-issued cellular phone are conducted by IAD. Investigators are trained to conduct active audits using a program developed by cellular provider AT&T and the SFPD Information Technology Division.

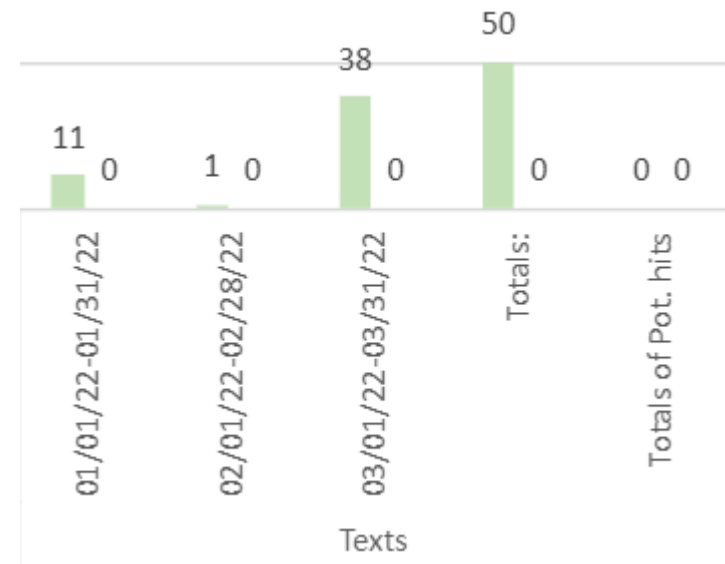
Every 30 days, a search is done of all texts using an established word list. Additional terms can be added and audited, as well.

All hits are saved by our service provider, AT&T. IAD investigators analyze every hit to determine the context in which the term was used. Those hits determined to be potentially biased are investigated.

Text Messages via Department-Issued Cellular Phones

First Quarter Results

Texts	01/01/22-01/31/22	11
	02/01/22-02/28/22	1
	03/01/22-03/31/22	38
	Totals:	50
	Totals of Pot. hits	0



There were 50 hits returned and analyzed; **none** were determined to be potentially biased.

Safety with Respect

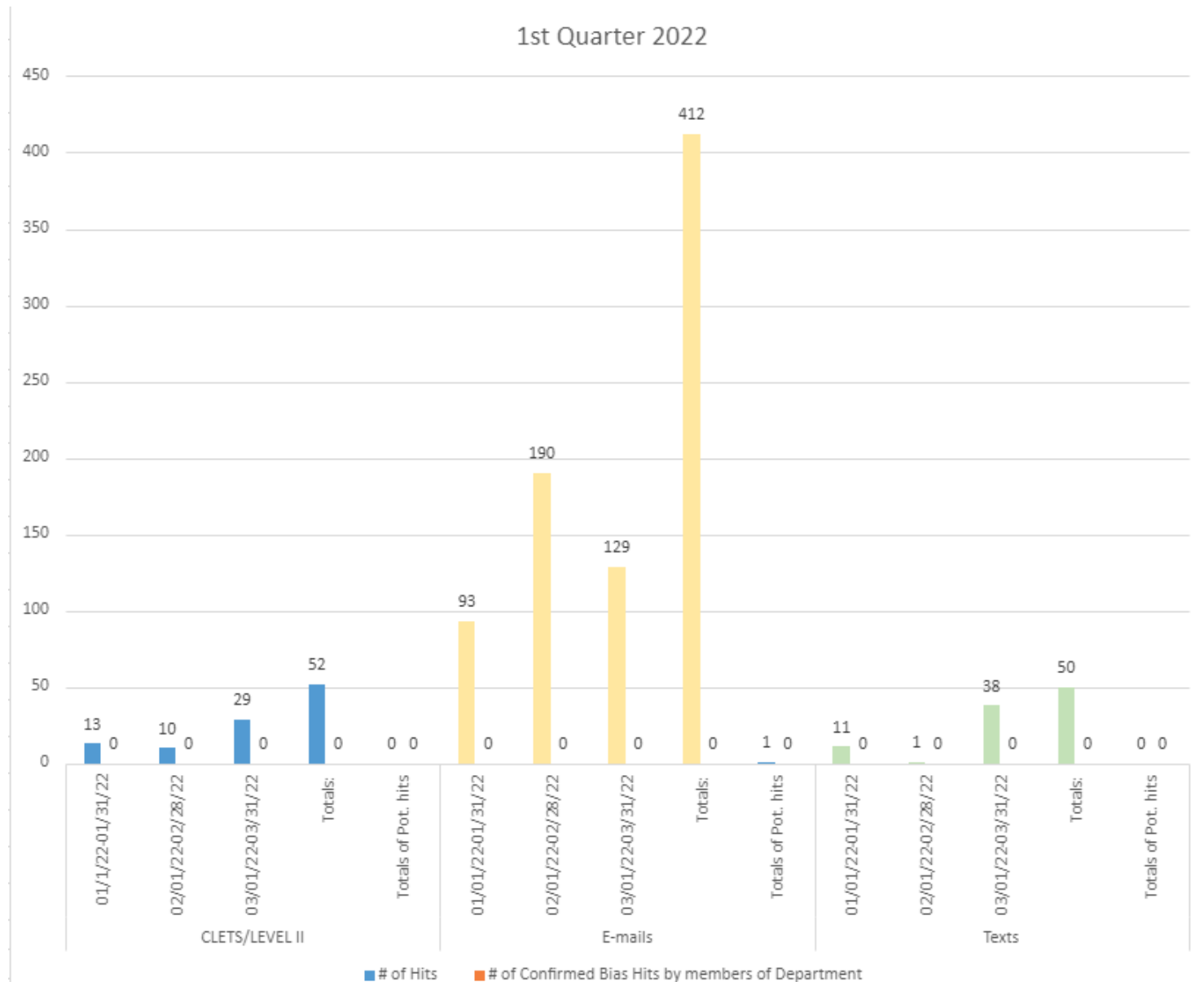
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Audit Results 1st Quarter (January-March 2022)			
Type	Date	# of Hits	# of Confirmed Bias Hits by members of Department
CLETS/LEVEL II	01/1/22-01/31/22	13	0
	02/01/22-02/28/22	10	0
	03/01/22-03/31/22	29	0
	Totals:	52	0
	Totals of Pot. hits	0	0
E-mails	01/01/22-01/31/22	93	0
	02/01/22-02/28/22	190	0
	03/01/22-03/31/22	129	0
	Totals:	412	0
	Totals of Pot. hits	1	0
Texts	01/01/22-01/31/22	11	0
	02/01/22-02/28/22	1	0
	03/01/22-03/31/22	38	0
	Totals:	50	0
	Totals of Pot. hits	0	0

All hits are evaluated by members of IAD for context to determine if they are related to bias.

Safety with Respect

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POLICE DEPARTMENT