



# Surveillance Impact Report

Web Filtering Software  
Juvenile Probation

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 Web Filtering Software (hereinafter referred to as "surveillance technology").

## PURPOSE OF THE TECHNOLOGY

The Department's mission is to serve the needs of youth and families who are brought to our attention with care and compassion; to identify and respond to the individual risks and needs presented by each youth; to engage fiscally sound and culturally competent strategies that promote the best interests of the youth; to provide victims with opportunities for restoration; to identify and utilize the least restrictive interventions and placements that do not compromise public safety; to hold youth accountable for their actions while providing them with opportunities and assisting them to develop new skills and competencies; and contribute to the overall quality of life for the citizens of San Francisco within the sound framework of public safety as outlined in the Welfare & Institutions Code.

The surveillance technology supports the Department's mission and provides important operational value in the following ways:

The web filtering tool enables the Department to protect the safety of young people housed in Juvenile Hall, who are under our care, by preventing access to content that may be harmful in the interest of public safety and the residents' well-being

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

### Authorized Use(s):

- To monitor young people's use of the internet so that only content that is appropriate to their academic/vocational coursework is viewed.*
- To configure and apply web filters across devices used to enforce safe web searches.*
- To ensure that firewalls are not bypassed or hacked for unintended use of the department's network.*

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

The web filtering tool will be deployed only in the Secure Commitment Track Residential Units.

## Description of Technology

### Surveillance Oversight Review Dates

PSAB Review: 10/5/2023, 2/22/2024

COIT Review: TBD (list all dates at COIT, and write "Recommended: MM/DD/202X" for rec date)

Board of Supervisors Approval: TBD

This is a product description of the technology:

GoGuardian allows for the application of a web filter across all users and operating system or browser - regardless of device type - all from one interface. It provides an interface to manage device assignments, track repair inventory, and generate analytics reports. It also allows the configuration of filtering policies across an entire group, in order to enforce web searches relating to the young persons' academic studies.

This is a description of how the technology works:

The technology allows for the application of a web filter across all users, operating systems, and browsers - regardless of device type. It provides one interface to manage device assignments, track repair inventory, and generate analytics reports. It also allows the configuration of filtering policies across an entire group, in order to uniformly enforce web searches relating to the young persons' academic studies.

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

Data collected or processed by the surveillance technology will not be handled or stored by an outside provider or third-party vendor on an ongoing basis. The Department will remain the sole Custodian of Record.

### **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:

|                                     | <b>Benefit</b> | <b>Description</b>  |
|-------------------------------------|----------------|---|
| <input checked="" type="checkbox"/> | Education      | The tool filters out content that is not conducive to completing their online academic coursework. The tool also enables filtering out content that may be harmful in the interest of public safety and the young peoples' well-being, including, |

- o Social media, internet games, YouTube, chat rooms, instant messengers, Snapchat, blog websites, as well as anything depicting violence or nudity;
- o Messages or data that contain inappropriate, defamatory, discriminatory, obscene, pornographic, harassing or illegal material, and engaging in activity that may harass, threaten, or abuse others.

Community Development

Health

Environment

Criminal Justice

Jobs

Housing

Public Safety

## **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:

The Department considers the *Loss of Autonomy* as a potential civil rights/liberties impact associated with the use of the web-filtering software for the following reason:

The young persons, whose web-activity will be monitored on a random basis, will not have control over what websites they visit other than those that are relevant to their academic/vocational coursework or that are safe and appropriate for viewing. Similarly, they will not be able to control the monitoring and viewing by Department staff of the websites visited.

The Juvenile Probation Department utilizes the web filtering tool only to fulfill our regulatory mandates as per Titles 15 and 24 to protect the wellbeing of young people in our care and establish protocols for communication with individuals outside the facility. All other uses are expressly prohibited.

The administrative safeguards are that Staff Training shall be conducted by Department IT Staff to reduce the possibility that the program is used contrary to its authorized use.

All authorized individuals requiring access will receive training on security policies and procedures prior to using the technology (e.g., small group meetings, 1-on-1s).

The technical safeguards are that only authorized & trained staff shall have access to the web filtering tool.

### C. Fiscal Analysis of Costs and Benefits

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

| Benefit                             | Description   |
|-------------------------------------|---|
| <input type="checkbox"/>            | Financial Savings   |
| <input type="checkbox"/>            | Time Savings  |
| <input type="checkbox"/>            | Staff Safety  |
| <input type="checkbox"/>            | Data Quality  |
| <input checked="" type="checkbox"/> | Other<br>The tool filters out content that is not conducive to completing online academic or vocational coursework. The tool also enables filtering out content that may be harmful in the interest of public safety and the young peoples' well-being. |

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

|  |   |                      |
|--|---|----------------------|
| Number of Budgeted FTE (new & existing) & Classification | System Administration & Staff Training -<br>· 1093 - IT Operations Support Admin II<br>· 1053 - Sr. IT Business Analyst<br>Application Managers:<br>· 8580 - Director of Facilities<br>· 8578 - Assistant Director of Facilities<br>· 8318 - Counselor 2<br>· 8320/8562 - Counselor<br>· 8322 - Sr. Counselor |                      |
|  | <b>Annual Cost</b>  | <b>One-Time Cost</b> |
| Total Salary & Fringe                                    | \$0.00  | \$0.00               |
| Software   | \$2,002.00  | \$1,500.00           |

|                       |            |            |
|-----------------------|------------|------------|
| Hardware/Equipment    | \$0.00     | \$0.00     |
| Professional Services | \$0.00     | \$0.00     |
| Training              | \$0.00     | \$500.00   |
| Other                 | \$0.00     | \$0.00     |
| Total Cost            | \$2,002.00 | \$2,001.00 |

The Department funds its use and maintenance of the surveillance technology through:

General Fund.

### 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: Marin County Probation Department also uses the technology for the same purpose in their adult education program and the San Francisco Juvenile Probation Department sought their experiences and insight with implementing the tool with their juvenile population. Additionally, the Oakland Unified School District also uses it on all laptops distributed by the district.

The effectiveness of the surveillance technology while used by other government entities is determined to be the following: The technology allows young people’s free use of the Internet without the access of web-content that is unsafe. The technology has allowed other jurisdictions – both in juvenile justice and education settings - to operate their programs while ensuring that appropriate web-content is available to young people.

The Juvenile Probation Department utilizes the GoGuardian web filtering tool only to fulfill our regulatory mandates as per Titles 15 and 24 to protect the wellbeing of young people in our care and establish protocols for communication with individuals outside the facility.