



Surveillance Use Policy

Bomb Squad Robots
San Diego Fire-Rescue Department

PURPOSE

The use of robots is standard operating procedures for all public safety bomb squads. The Federal Bureau of Investigation (FBI) provides the accreditation of all public safety bomb squads. Part of the accreditation process is the verification that all bomb squads have the minimum equipment required to respond to a known or suspected improvised explosive device (IED). At least one general service bomb squad robot is a required piece of every bomb squad's inventory. The inability to use robots would jeopardize the City of San Diego's accreditation and unnecessarily put our bomb technicians in harm's way.

The purpose of the technology is to enhance SDFD Bomb Squad's ability to perform tasks in potentially hazardous areas remotely, limiting personnel's exposure to danger and injury.

USE

One of, if not the most valuable, tools that the Bomb Squad utilizes are robots. Robots give Bomb Squad technicians the ability to visually inspect and perform "render safe procedures" (RSP) from a remote location ensuring their safety. An RSP is a process in which an IED is disabled from exploding as it was intended to.

All of SDFD's robots have the below common features:

1. They are all equipped with cameras to provide the technician with the ability to inspect suspicious items and gain situational awareness regarding the layout of a hazardous environment. At this point in time, the land robots do not have the capability to record still images, but this could change in the future.
2. They all have the ability to operate wirelessly through an encrypted radio system with the exception of the underwater remotely operated vehicle (ROV).

Some robots have an additional camera sensor that can take photographs and video in the Forward Looking Infrared (FLIR) spectrum, perform diagnostics, and perform render safe procedures.

Most of SDFD's robots do not have the ability to capture still images or record video. All video feeds are streamed live to the operator's console. For robots that have the capability to capture or record imagery, SDFD strictly adheres to the data collection policies referenced below:

- SDFD Operations Manual, Standard Instruction 02, Section 46.3 – Unmanned Aircraft System (UAS) Data Collection

DATA COLLECTION

If a robot is capable of capturing or recording imagery, the bomb technician will make the determination when to manually capture or record imagery. The only images that the bomb technician generally would collect and retain would be images of IED. The areas surrounding the IED are typically evacuated by the time the robot is utilized. Unless the IED is attached to a person, the bomb squad robot is not capturing images of people and would not likely collect any personally identifiable information (PII).



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DATA ACCESS

All bomb technicians are trained in how to collect and manage robot imagery. Bomb technicians are the only personnel that have access to robot data. Bomb technicians are responsible for manually downloading imagery after the completion of each incident and either securing or deleting the imagery in accordance with department policy. Certified bomb squad technicians are all classified employees, and their rankings range from firefighter through captain.

DATA PROTECTION

Any imagery that is retained is securely stored on a City of San Diego computer, which requires a password to access. Any access provided to robot imagery will be managed by Bomb Squad personnel.

DATA RETENTION

During a Bomb Squad incident, the bomb technician can manually activate the video recording capability of the robot. This captured video is regarded as Digital Media Evidence (DME). It is treated as evidence throughout the remainder of the operation until the DME is properly impounded and documented by the bomb technician(s) assigned to the operation.

Data recorded with robots will be retained in accordance with the following:

A. DME Retention and Management

- a. The manner in which the DME is stored by the robot as it is being captured will dictate how the evidence will be secured. If the evidence is stored on a removable device, that device shall be secured at the completion of each mission by the bomb squad technician that obtained the evidence. The technician will document the date, time, location, and incident numbers or other mission identifiers and the bomb squad technicians involved in mission. This evidence shall be handled in accordance with agency evidence procedures.
- b. If the DME is stored on the system hard drive, which is the case for the the ROV, it shall be handled in accordance with accepted forensic standards for DME without the need to remove the actual storage device.
- c. As with all evidence, unauthorized personnel shall not edit, alter, erase, duplicate, copy, share, or otherwise distribute DME.
- d. All access to DME must be specifically authorized by SDFD policy and in accordance with proper evidence handling procedures. The chain of custody documentation for the DME allows for necessary auditing to ensure that only authorized users are accessing the data for legitimate purposes.
- e. SDFD may provide DME to outside agencies, i.e., the District Attorney's Office and United States Attorney's Office. SDFD is only responsible for the retention and management of DME in its possession and cannot control the use, retention and management of DME lawfully in the possession of a third party.



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PUBLIC ACCESS

The public has no access to SDFD robot data. Robot collected DME can only be accessed by SDFD bomb technicians and is managed by SDFD policy and procedure.

Nothing in this policy restricts the City's ability to comply with state and federal law regarding disclosure of public records.

THIRD PARTY DATA SHARING

The only data capable of being shared as of now is images captured by the underwater ROV. This data could be shared with local law enforcement agencies, the FBI or Federal Bureau of Alcohol, Tobacco, Firearms and Explosives, among other authorized agencies, in accordance with local, state, and federal law and SDFD policy and procedure.

TRAINING

By congressional mandate, the FBI is responsible for the training and accreditation of all public safety bomb squads in the United States. In the early 1970's, the FBI established the Hazardous Devices School, or HDS, in Huntsville, Alabama. HDS is responsible for the initial certification of all public safety bomb technicians and requires recertification on a three-year interval. There are approximately 465 public safety bomb squads in the United States with approximately 3,000 certified technicians. For the City of San Diego, the Fire Department provides this service citywide with 13 certified technicians.

Bomb technician training involves training with a variety of equipment and tactics with the goal of preventing known or suspected improvised explosive devices, or IED's, from functioning as they were designed, which is to injure people and damage property. It takes approximately 18 months of in-house training to prepare bomb technician candidates to attend the Hazardous Devices School's certification course. The certification course is an intense six-week course at HDS.

During all operations, bomb technicians are trained to make every effort only to capture visual imagery consistent with the mission objectives and to protect the privacy of nearby uninvolved citizens and their property.

AUDITING AND OVERSIGHT

The Bomb Squad Commander is the primary oversight of the Bomb Squad program and the use of robots. Any complaints about the use of the robots will be investigated in compliance with SDFD policy.

MAINTENANCE

The SDFD Bomb Squad conducts all required maintenance and inspections on all robots in accordance with manufacturer recommendations.