Surveillance Use Policy

DEJERO DOWNLINK TRANSMISSION SYSTEM
San Diego Police Department

PURPOSE

The Dejero Downlink Transmission System (DTS) is used for the following purpose:

1. To support first responders during critical incidents, special events, and large gatherings by transmitting real-time video to a command post or tactical teams from a remote location via a cellular data-based video transmission system.
2. For internal training purposes.
3. For use by the SDPD Media Services Unit for social media and outreach purposes.

USE

The Dejero DTS is primarily used by the SDPD UAS Unit.

The Dejero DTS is comprised of the following 3 components:

1. Dejero Engo (Video transmitter). The Engo takes video from a "video source" and transmits it via a cellular signal to a receiving server, the Dejero Waypoint.
2. Dejero Waypoint (Video receiver). The Waypoint receives video transmission from the Engo.
3. Dejero Cuepoint (Video Management System). The Cuepoint takes the received video from the Waypoint and creates a secured video access point that can be accessed via the internet.

None of the Dejero DTS equipment contain any cameras, or microphones, or directly collect any data on its own.

To use the Dejero DTS it must be connected to a "video source" like a video camera or the ground controller display of an Unmanned Aircraft System (UAS). The Dejero DTS, specifically the Engo, takes the live video feed from the "video source" and transmits it via a cellular signal to the Waypoint. The Waypoint is connected to the Cuepoint which creates an internet access point. SDPD personnel, who have access credentials can then access this live video via the internet.

The procedural use of the Dejero DTS is therefore based on the authorized use of the "video source" it is transmitting. The Dejero DTS is primarily used by the SDPD UAS Unit. Below is the SDPD UAS Unit policy use.

The UAS Unit is authorized to support the following types of operations:

1. Search and Rescue support for lost, missing, missing-at-risk, stranded persons, or suspects.
2. Provide aerial observation and imagery for safety and situational awareness in support of fire response, and disaster response.
3. Provide photo and video digital media recordings in support of crime scene evidence collection.
4. Provide aerial and remote camera observation and imagery during incidents involving barricaded suspects, hostage incidents, and high-risk tactical operations.
5. Provide aerial imagery and photo/video support for department training.
6. Provide enhanced safety overwatch during large gatherings and special events.
7. Any other missions deemed necessary by the Chief of Police.

The following rules and processes are required prior to each use of a UAS:

1. All requests for UAS support must be initiated by an incident commander in response to support a specific incident or event with a specific support objective.
2. A UAS supervisor must then evaluate the request and approve the UAS operation prior to deployment to support each individual incident. This UAS supervisor is specially trained to assess the request and determine if the UAS operation will comply with the SDPD's list of authorized uses for UAS. The UAS supervisor is also specially trained in the use of UAS as it relates to the protection of citizens' privacy, civil rights, and the preservation of citizens' First and Fourth Amendment rights.
3. If UAS deployment is approved by the UAS supervisor, notifications are made to the lieutenant who supervises the UAS Unit and to the Commander of the Operational Support Division.
4. Only authorized members of the UAS Unit shall use or be in possession of Department UAS equipment. All UAS members certified as UAS Pilots must obtain an FAA Remote Pilot's license and must complete the SDPD UAS Academy.

Department procedures associated with the use of UASs are:

- 8.23 – Use of Small Unmanned Aircraft System
- 1.57 – Military Equipment
- 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks

DATA COLLECTION

The Dejero Engo device of the Dejero DTS has the ability to make a video recording of the video data that is being transmitted through it from the original "video source."

The Dejero DTS is assigned to the SDPD UAS Unit. The Dejero Engo, nor any of the Dejero DTS do not automatically record video. For the Dejero Engo to make a recording of the "source video," the operator of the Dejero Engo, (UAS Unit personnel), would have to manually activate the record feature.

This recording feature of the Dejero Engo is not normally used. It is the general practice of the UAS Unit personnel to only use the live video transmission capability of the Dejero Engo and not to use the recording feature. Recording of evidence and law enforcement activity is normally recorded on the "source video" equipment, such as the actual video camera or UAS.

If the Dejero Engo recording feature was activated accidentally during a law enforcement event, the recorded video data would be deleted immediately.

In the rare case that the Dejero Engo recording feature was used intentionally during a law enforcement, event, the collected video would then be classified as collected Digital Media Evidence (DME). All Digital Media Evidence (DME) in the form of video evidence that is captured on the Dejero Engo would be impounded in one of two ways.

1. The DME is extracted from the Dejero Engo and placed onto a portable drive by UAS personnel. This portable drive is then physically impounded in the SDPD Property room and labeled as impounded property. The Dejero Engo is then wiped clean of data. A UAS supervisor is responsible to verify the DME was impounded properly, the chain of custody was documented, and the data on the Dejero Engo was wiped clean of DME.

2. Or, the DME is extracted from the Dejero Engo and uploaded directly into the SDPD evidence.com digital evidence repository. The data file on the Dejero Engo is then wiped clean of data. A UAS supervisor is responsible to verify the DME was impounded properly, the chain of custody was documented, and the data on the Dejero Engo was wiped clean of DME.

Dejero Engo devices are only authorized to be in the possession of SDPD UAS Unit members who are responsible for their operation. The SDPD UAS Unit members assigned to the UAS Operation are also responsible to document the related collection of evidence and the chain of custody associated with impounding the evidence.

DATA ACCESS

Access to the live video via the internet is controlled by the UAS Unit members who are trained on the Dejero DTS system.

During a specific law enforcement incident, the UAS Unit member assigned to manage the Dejero DTS will generate a website Uniform Resource Locator (URL) or website address link. The UAS Unit member will then send this URL only to authorized SDPD incident commanders, tactical team leaders, or Command Post managers. This specific URL is required to access the live video stream being transmitted by the Dejero Engo. These URL access links have a pre-designated automatic termination time limit, (normally 24 hours). A new URL access link is created for every incident and old URL links will not work for future events, preventing unauthorized access even by members who had access to prior events.

The Dejero DTS transmits its cellular-based data via an encrypted system and cannot be accessed by anyone who has not been given the incident-specific URL by the UAS Unit staff member controlling the Dejero DTS.

In the rare cases that the Dejero Engo was used to create a video recording file, that video file would be impounded as DME by the UAS Unit staff. Access to that impounded DME would comply with existing Department Procedures.

Once the DME has been impounded physically or electronically, retention, access, possession, and copying of such evidence is controlled and regulated by SDPD Procedure 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks and SDPD Procedure 1.49 – AXON Body Worn Cameras.

Operation of the Dejero DTS and control of the live video URL links is the responsibility of specially trained UAS Unit personnel. Only sworn SDPD Police Officers may become part of the SDPD UAS Unit. All SDPD UAS personnel must be approved by the UAS Unit Sergeant, the Lieutenant who supervises the UAS Unit, and the Commanding Officer of the Operational Support Division. All SDPD UAS personnel receive specialized training on the proper handling, possession and impounding of DME recovered by UAS.

DATA PROTECTION

The Dejero DTS transmits its cellular-based data via an encrypted system and cannot be accessed by anyone who has not been given the incident-specific URL by the UAS Unit staff member controlling the Dejero DTS.

All DME retained on the Dejero Engo can only be accessed by authorized UAS Unit personnel until it is extracted and impounded per Department Procedures.

Once DME has been impounded physically or electronically, Data protection becomes the responsibility of the Property Unit or the evidence.com system and all such evidence is controlled and regulated by SDPD Procedure 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks and SDPD Procedure 1.49 – AXON Body Worn Cameras.

DATA RETENTION

Once DME has been impounded physically or electronically, evidence retention is the responsibility of the SDPD Property Unit or the evidence.com system and all such evidence is controlled and regulated by SDPD Procedure 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks and SDPD Procedure 1.49 – AXON Body Worn Cameras.

PUBLIC ACCESS

Dejero Engo collected DME can only be accessed by SDPD UAS Unit personnel prior to evidence impound. Once collected DME is impounded by UAS Personnel into the SDPD Property Room or evidence.com digital repository, access to this DME is controlled and regulated by SDPD Procedure 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks and SDPD Procedure 1.49 – AXON Body Worn Cameras.

THIRD PARTY DATA SHARING

UAS Unit personnel do not share collected DME with third-party vendors. All Dejero Engo collected DME is impounded either physically in the SDPD Property Room or digitally into evidence.com.

TRAINING

Only certain, specialized SDPD UAS Unit personnel are the only persons who are authorized to use or access any of the Dejero DTS equipment. The UAS Unit personnel who are authorized to use and manage that Dejero DTS must undergo specialized training on the proper use of the Dejero DTS and the generation and authorized sharing of the live video access URL link.

AUDITING AND OVERSIGHT

The UAS Supervisor has primary oversight and approves each UAS Operation, which includes the use of the Dejero DTS. This UAS Supervisor is responsible to ensure all actions by UAS Personnel comply with SDPD Department Procedures and the Surveillance Use Policy for each specific UAS operation that used the Dejero DTS.

The SDPD Sergeant in charge of the UAS Unit is an additional oversight and auditor of all Dejero DTS use and any related data collection, evidence impounding, and documentation by the UAS Pilots and support staff for all Dejero DTS-related activity. This UAS Unit Sergeant is responsible to ensure all actions by UAS Personnel comply with SDPD Department Procedures and the Surveillance Use Policy for every SDPD Procedure. The UAS Sergeant conducts monthly inspections and audits of all Dejero DTS activity.

Once UAS collected DME is impounded by UAS Personnel into the SDPD Property Room or evidence.com digital repository, access to this DME is controlled and regulated by SDPD Procedure 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks and SDPD Procedure 1.49 – AXON Body Worn Cameras.

MAINTENANCE

SDPD Dejero DTS equipment is inspected, and maintenance is performed on a monthly schedule to ensure the safe and functional operating condition of the equipment prior to use. This inspection also ensures the security and integrity of the surveillance technology and the information collected.

SDPD Dejero DTS equipment is additionally inspected prior to every activation to ensure it is in proper working condition.

All Dejero DTS maintenance and inspections are conducted by UAS personnel who receive specialized training on the equipment they are inspecting and maintaining.