

Executive Summary

Objectives - Two audit objectives were identified for the biennial audit of the Body Worn Camera.

1. Assess the Minneapolis Park Police use of BWC to determine it's compliance with Minnesota statute 13.825.
2. Review, examine, and assess Park Police policies and procedures for the operation of BWC to determine if there are any potential for improvement to support compliance efforts and operation.

Scope

Wildcard has conducted a biennial audit of the Minneapolis Park Police Department use of Body Worn Cameras (BWC). The objective of this engagement is to audit compliance with BWC laws and regulations, and review relevant policies, procedures and security controls, as required by the State of Minnesota Statute 13.825. The audit was an independent review of the Park Police's implementation of BWC technology and processes to determine how data is currently classified, used, and destroyed. Wildcard also verified that the system access was appropriate.

The audit was conducted by evaluating the use of the system via observing relevant artifacts, conducting interviews with personnel, and examining the system. Our observations ranged from January 1, 2018 to December 31, 2019. We have determined that Park Police's operation of BWC technology is in compliance with Minnesota Statute 13.825 and all associated relevant statutes.

Wildcard worked with Park Police to determine that:

- Park Police BWC policy includes provisions for all mandated elements
- Data is appropriately classified
- Data is properly maintained and destroyed
- Public Data is properly sanitized
- Access to data is limited

Introduction

The audit objectives, scope and methodology are described in Appendix A.

BWC Audit

The audit of Park Police use of BWC covers the period of January 1, 2018 to December 31, 2019. Wildcard collected artifacts and conducted interviews with BWC operators to determine its compliance with Minnesota statute 13.825. The BWC is defined as a device worn by a peace officer that is capable of both video and audio recording of the officer's activities and interactions with others or collecting digital multimedia evidence as part of an investigation.

General observation – Park Police has put in place formal policies and procedures to operate the BWC system in compliance with Minnesota Statutes. Officers are formally trained in the handling and use of BWC and relevant data. Park Police has written policies in place, properly classify data, appropriately sanitize publicly released data, restricted system access, applied appropriate automated data retention controls, and adhere to statutory requirements.

Policy

Observation – The Park Police has an established policy that addresses the mandates associated with Minnesota Statute 13.825. The policy is defined in Special Order 2019-11 Body Worn Camera (BWC) Policy Update and last updated on October 24, 2019.

Analysis – After reviewing the policy and comparing its contents to the mandates in Minnesota statute 13.825, all of the requirements for BWC use and personnel are addressed.

Recommendation – None

Data Classification

Observation – Data collected by BWC automatically has the designation of nonpublic. In order for data to be released to the public a request must be made, and content reviewed by BWC coordinator to redact any sensitive data.

Analysis - Wildcard examined the process for sharing data with other agencies and releasing data to the public. The Park Police controls that are in place meet requirements of keeping data collected by BWC

from public consumption. Shortly after each recorded activity, BWC data is assigned a category which automatically defines its retention characteristics. Park Police has also put in place supervisory review processes to evaluate if data is classified correctly. This review process reduces risk that data will be purged from the system inadvertently.

Recommendation – None

Data Maintenance and Destruction

Observation – BWC data is stored in a system that limits access to data and automatically manages retention. Data has a retention period that ranges from a minimum of 1 year and up to 7 years. Park Police has implemented a Quality Assurance program that mandates supervisors review submitted BWC data to validate that data has been properly categorized and has the appropriate retention settings assigned to them.

Analysis - Wildcard reviewed policies and examined BWC data. Based on the data examined there was no evidence that any data was categorized in a higher risk area. A high risk category would be one that has data deleted earlier than intended retention schedule. The regular supervisory review process adequately detected any category deviations.

Recommendation – None

Public Data Request Handling and Redaction

Observation – MPPD receives requests via email to release BWC data to the public. Requests from outside agencies are typically received via email. The data management office processes these requests by validating that the individual making the request is authorized to receive the data. The BWC Coordinator then reviews the footage and obfuscates any audio and video that should not be released to the public due to lack of consent or sensitivity of footage. Once the initial footage has been scrubbed it is reviewed for quality control. After a quality control check the footage is released.

Analysis - Wildcard conducted interviews with MPPD personnel. We collected examples of data requests to understand how requests are received and processed. The BWC software is able to obfuscate both video and audio and create a new file that preserves the initial copy. That new file is then shared with the requester.

Recommendation – None

Data Access and Security

Observation – Access to the BWC portal is granted by written permission from the Park Police Chief. Park Police has a written access control policy, and written documentation authorizing all users that have access and specifying the purpose of the access. There are roles based access controls in place that limit access to data by the job function assigned to each individual.

There are no current technological controls within the Park Police to detect if a breach has occurred within the BWC portal. To compensate, the BWC coordinator conducts a review of when personnel are logged into the system. Logs are checked several times a week to determine when officers are last active. If there is odd activity the video feed is evaluated. The incident response policy is defined in the BWC policy

Analysis - The roles defined with the portal are fine tuned and restrictive. The number of administrators within the system has been limited to specialized personnel. There is a restrictive process in place that limits who has access to the BWC portal and data.

Recommendation - None

BWC Use

Observation – Park Police personnel are only authorized to use Park Police issued equipment for recording. In the event of equipment failure, supervisors advise their officers to report the issue to supervisors and the BWC coordinator. The BWC coordinator is responsible for servicing the units, replacing units, and putting units into rotation for officer use. In the event that the BWC coordinator is not available, a spare unit is assigned to the officer.

Analysis - Wildcard interviewed BWC users and administrators and determined that Park Police personnel have been trained to not use any equipment other than issued equipment. Park Police personnel handle malfunctioning equipment by coordinating with BWC coordinator or their supervisor.

Recommendation - None

BWC Procurement

Observation – The Park Police has a procurement process in place that integrates the requirements associated with Statute. There have not been any major procurements by the Park Police that fall within the audit period.

Recommendation - None

Appendix A: Methodology

Audit Objectives

Two audit objectives were identified for the biennial audit of the Body Worn Camera (BWC).

1. Assess the Minneapolis Park Police (Park Police) use of BWC to determine it's compliance with Minnesota statute 13.825.
2. Review, examine, and assess Park Police policies and procedures for the operation of BWC to determine if there are any potential for improvement to support compliance efforts and operation.

This audit is a biennial audit mandated by state law. Our findings are that Minneapolis Park Police Department operates in compliance with state statutes. To ensure a wide coverage for compliance assurance, interviews were conducted with BWC administrators, system logs and settings were evaluated, policy was reviewed, and training materials were assessed.

The methodology used during the audit has been refined using well known frameworks integrating:

- American Institute of Certified Public Accountant (AICPA)
- Information Systems Audit and Control Association (ISACA)
- Control Objectives of Information Technology (COBIT)
- Infrastructure Library for Information Technology (ITIL)

The audit was conducted in three distinct phases:

1. During the Planning phase criteria were developed to support the audit objectives and an audit program was produced to identify the information that will be collected during the audit execution phase.
2. During the Execution phase artifacts were collected to evaluate relevant information (interviews, document reading, and log/system evaluation) on the BWC operational functions.
3. During the Reporting phase, information analysis is finalized. Findings are presented in a draft report and presented to stakeholders for evaluation. Stakeholders have the opportunity to review findings and provide a rebuttal. We then finalize the report and structure working paper files.

Appendix B: Interview List

In the execution of this audit, Wildcard interviewed the following:

- 1 Administrator
- 3 Supervisors
- 10 Patrol Officers