

# Minnesota Security Consortium – MNSec

*Bringing Information Security to Local Minnesota Governments*

## Robbinsdale Police Department

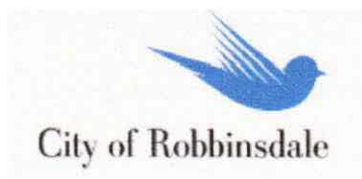
### 2020 ALPR Audit

#### Executive Summary

Prepared for the

Robbinsdale Police Department

March 16, 2020



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## **Background:**

Robbinsdale Police Department retained Minnesota Security Consortium in order to audit its agency's use of ALPR's against the requirements of MN Statute 13.824. The Minnesota Security Consortium does not operate or have access to their ALPR systems, therefore allowing it to audit the systems as an independent auditor. The City of Robbinsdale Police Department IT Staff provided their administrative access to the BOSS/PAGIS during the audit in order to review audit criteria. Robbinsdale Police Department had their last ALPR Audit in 2017, as required by Statute. Robbinsdale Police Department had ALPR systems on 2 Squad Cars during the audit period and with no stationary ALPR units at the time of the audit. However as of March 11, 2020, the Robbinsdale Police Department have terminated their ALPR program and have given the proper termination notice to the Minnesota BCA.

## **Department Policy & Procedures:**

Robbinsdale Police Department has an ALPR Policy in place entitled, "Section 228: Use of Automated License Plate Readers (ALPR's)." They had been keeping their policy updated and it contained all of the necessary policy statements. A review of this policy found that Robbinsdale Police Department was compliant in this part of the statute.

## **Record Retention:**

The Robbinsdale Police Department ALPR Boss administrative control panel was audited to ensure that each device setting was set for a retention period of no more than 60 days. Robbinsdale Police Department was found to be compliant with this part of the statute.

## **Data Security and Access Control:**

The Robbinsdale Police Department's ALPR system is protected by an Access Control system built into the BOSS backend server application. Users and groups were found to be current and appropriate for the intended use by the agency, allowing users only the minimum access that they need to perform their functions. User accounts and role based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrator is appointed by the Robbinsdale Police Department's Chief of Police. The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. Robbinsdale Police Department was found to be compliant in this part of the statute.

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## **Data Classification:**

Robbinsdale Police Department ALPR Data that has been collected is classified as private unless access is permitted by law. Public data requests of data collected on a license plate owner's vehicle is readily available through a proper records request via the Robbinsdale Police Department. Robbinsdale Police Department was found to be compliant with this part of the statute.

## **Sharing Among Law Enforcement Agencies:**

Appropriate sharing of ALPR data is conducted through inter-agency requests. The requests are made to the Robbinsdale Police Office Manager or other personnel as authorized by the Chief of Police. The requests are documented by agency name, requesting party and case number and documented into the BOSS search to create an audit trail. As a result of these findings, Robbinsdale Police Department was found to be compliant with this part of the statute.

## **Public Log of Use:**

The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users. These public logs of use are readily available through a proper records request through the Robbinsdale Police Department. Robbinsdale Police Department was found to be compliant with this part of the statute.

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## **Notification to Bureau of Criminal Apprehension:**

Robbinsdale Police Department made the required notification to the Bureau of Criminal Apprehension when it started its ALPR Program. This was validated on the BCA website. March 11, 2020, the Robbinsdale Police Department have terminated their ALPR program and have given the proper termination notice to the Minnesota BCA. The Robbinsdale Police Department was found to be compliant with this part of the statute.

## **Biennial Public Accountability Audit:**

Robbinsdale Police Department installed their ALPR system in 2013. They had their first ALPR Audit in September 2017, and even though they have terminated their ALPR program, wanted to have one last audit to comply with the Statute. Command and IT Staff were very cooperative throughout the entire audit process and understand the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of the Boss ALPR Systems. Robbinsdale Police Department was found to be compliant with this part of the statute.

## **Breach Notification:**

The Robbinsdale Police Department utilizes the City's Incident Response Policy which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. Robbinsdale Police Department was found to be compliant with this part of the statute



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## **Conclusion:**

Based on the results of the Robbinsdale Police Department ALPR Audit conducted by Minnesota Security Consortium, we are able to demonstrate that they are using the ALPR System as an effective law enforcement tool for the purpose of combating auto theft and other crimes linked to a vehicle license plates. The Robbinsdale Police Department also demonstrated that the security, public accountability and administration of the program is in compliance with MN Statue 13.824.

This Audit was conducted and attested to by:



Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium

Submitted to:

Robbinsdale Police Department Chief of Police

Minnesota Commissioner of Administration

Legislative Commission on Data Practices and Personal Data Privacy

Required Chairs of Legislative Committees

Minnesota Legislative Library