



10/05/2020

Mike Ceynowa
City of Duluth Police Department
2030 North Arlington Avenue
Duluth, MN 55811

Re: Body Worn Camera Audit

Dear Mr. Ceynowa,

FRSecure LLC was retained by the City of Duluth Police Department to conduct an audit of their Body Worn Camera (BWC) program. The purpose of the audit was to evaluate the operational processes and security controls used to manage the use of BWC's and storage of the recorded data and to validate that these controls and operational processes are in compliance with the 2019 Minnesota Statutes, sections 13.82, 13.825 and 626.8473 that apply to BWC's.

These efforts were led by a professional security practitioner that has over 20 years' experience performing audits and risk assessments.

The analysis was conducted using the 2017 Minnesota Statutes, sections 13.82, 13.825 and 626.8473. The results are detailed below:

1. Reviewed the policies in place to govern the use of BWC. No concerns were observed.
2. Performed a review of the audit trail that shows the date and time that all portable recording is collected. No concerns were observed.
3. Verified that audit records provide the details on individual recordings as well as a daily number of recordings obtained, and the overall total amount of space used to store the recordings. No concerns were observed.
4. Verified that recording data is appropriately classified according to section 418.7 of the Duluth Police Department Policy 418, Body Worn Cameras. Recordings are treated as private/nonpublic unless another more stringent classification applies (i.e. recording is involved in an investigation of a peace officer discharging his weapon or other situation as specified in section 418.7 of the Duluth Police Department Policy 418, Body Worn Cameras), or if the recordings have been authorized for public release (i.e. after the completion of an investigation that involve a peace officer discharging a weapon). Procedures are in place to apply the proper classification of recordings. No concerns were observed.
5. Verified that sunset dates are set on the recordings to automatically purge at 90 days except for the situations described in section 418.9 of the Duluth Police Department Policy 418, Body Worn Cameras where recordings must be retained for at least one year. In instances where recordings must be retained longer than 90 days, the department has procedures for updating the sunset date as appropriate. No concerns were observed.
6. The department does share the recordings for official purposes only. The Data Release Coordinator is responsible for approving release of recordings outside of the department. An audit trail is retained of all recordings that are released, who released the recording and what actions were taken to prepare the recording for release (i.e. redaction). No concerns were observed.



7. Performed a sample access review to verify that users of the BWC system are authorized and have the appropriate access (role) assigned. Reviewed sampling of the users and verified their employment and position with the City of Duluth Human Resources, Diane Schlossin. No inappropriate access was discovered.

We hereby attest to the fact that the City of Duluth Police Department has taken and currently maintains reasonable, appropriate, and effective operating procedures for the proper management of the BWC program and have implemented proper security measures to protect and dispose of the recordings in their possession in accordance with the 2017 Minnesota Statutes, sections 13.82, 13.825 and 626.8473.

Sincerely,

John Harmon
President
FRSecure, LLC