

Minnesota Security Consortium – MNSec

Bringing Information Security to Local Minnesota Governments

Edina PD 2021 ALPR Audit

Executive Summary

Prepared for the

City of Edina Police Department

October 7, 2021



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Background:

Edina Police Department retained the Minnesota Security Consortium to audit its agency's use of their Automated License Plate Recognition (ALPR) system 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 Edina Police Department IT Staff provided their administrative access to the BOSS/PAGIS systems during the audit to review audit criteria. The Edina Police Department had their last ALPR Audit in 2019, as required by Statute. The Edina Police Department has ALPR systems on 9 Squad Cars and no stationary ALPR units at the time of the audit.

Department Policy & Procedures:

The Edina Police Department has an ALPR Policy in place entitled, "Policy Number 770.00: Automated License Plate Recognition System." They have been reviewing and keeping their policy current on a regular basis. A review of this policy found that Edina Police Department was compliant in this part of the statute.

Record Retention:

The Edina 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. Edina Police Department was found to be compliant with this part of the statute.

Data Security and Access Control:

The Edina 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 Edina 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. Edina Police Department was found to be compliant in this part of the statute.

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Data Classification:

Edina 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 Edina Police Department. Citizens can fill out the agency's online Public Data Request form or by filling out a similar form at the Police Front Desk. Edina 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 Edina Police Records 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, Edina 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 properly. Edina Police Department compiles monthly reports that contain the requirements of 13.824 Subd. 5. Sample reports from the past two months were reviewed during the audit process. These public logs of use are readily available through a proper records request through the Edina Police Department. The Edina Police Department was found to be compliant with this part of the statute.

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Notification to Bureau of Criminal Apprehension:

The Edina Police Department has made the required notification to the Bureau of Criminal Apprehension. This was validated on the BCA website. Edina Police Department was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

The Edina Police Department installed their ALPR system in 2013. They had their first ALPR Audit in June 2017, their second audit in 2019 and continue to plan for an independent audit every two years, in accordance to MN Statute 13.824. 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. The Edina Police Department was found to be compliant with this part of the statute.

Breach Notification:

The Edina 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. Edina Police Department was found to be compliant with this part of the statute

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Conclusion:

Based on the results of the Edina Police Department ALPR Audit conducted by Minnesota Security Consortium, we can 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 Edina Police Department also demonstrated that the security, public accountability and administration of the program is in compliance with MN Statute 13.824.

This Audit was conducted and attested to by:



Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium

Submitted to:

Edina 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