



May 4, 2022

Representative Jamie Becker-Finn, Chair  
Legislative Coordinating Commission Subcommittee on Data Practices  
559 State Office Building  
St. Paul, MN 55155

Senator Andrew Mathews, Vice-Chair  
95 University Avenue W.  
Minnesota Senate Bldg., Room 2105  
St. Paul, MN 55155

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Legislative Commission on Data Practices  
72 State Office Building  
100 Rev Dr Martin Luther King Jr Blvd  
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Please find enclosed the Independent Biennial Audit of the City of Brooklyn Center Police Department Portable Recording System (Body-Worn Cameras). The audit was completed on 6 April 2022 and covered 1 July 2019 to 6 April 2022.

Respectfully,

A handwritten signature in black ink, appearing to read "Tony Gruenig". The signature is fluid and cursive, with a large loop at the end.

Tony Gruenig  
Interim Chief of Police  
Brooklyn Center Police Department  
City of Brooklyn Center  
6645 Humboldt Av N  
Brooklyn Center MN

Enclosure: 2022 BWC Audit Report – Brooklyn Center Police Department



3 May 2022

Tony Gruenig  
Interim Chief of Police  
Brooklyn Center Police Department  
City of Brooklyn Center  
6645 Humboldt Av N  
Brooklyn Center MN 55430

At the request of the Brooklyn Center Police Department (BCPD), True Blue Services conducted the biennial audit of the police department's use of the Portable Recording System (Body-Worn Camera System (BWCs).) This was conducted on April 6, 2022. The purpose of this audit was to verify if the Brooklyn Center Police Department is in compliance with the following Minnesota State Statute sections relating to Body-Worn Cameras.

Minnesota §13.825 – Portable Recording Systems

Minnesota §626.8473 – Portable Recording Systems Adoption; Written Policy Required

#### Overview:

This analysis and audit were conducted using the current Minnesota State Statutes as reference. The data reviewed was from 1 July 2019 to 6 April 2022.

As of 6 April 2022, the Brooklyn Center Police Department was authorized 49 sworn police officers who are authorized and directed to use their department issued BWCs according to policy.

Brooklyn Center Police utilize the *Panasonic Arbitrator* system. This system handles both the police department's body-worn cameras and the dashboard mounted in-squad recorders. This audit, per Minnesota statute, only analyzes the body-worn cameras, policies, and practices.

True Blue Services does not own, operate, or have any access to any *Panasonic Arbitrator* system, thereby fulfilling the required independence of this audit. The Brooklyn Center Command Staff, Support Services Division, and with the support of the Information Technology Department, provided access to the *Panasonic Arbitrator* system to allow independent review of the data and complete this audit.

The results of this analysis and audit are detailed below.

MN Statute Requirement	Audit Objective	Audit Procedure	Audit Result
§13.825 Subd. 2	Verify Data Collected is Classified	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Mobile Video Records Policy 423.7.1 - Classification of MVR Data</u>, and <u>Policy 423.9.1 - Copies of Recorded Media</u>.</li> <li>2) Reviewed BCPD Policy 805 – Protected Information.</li> <li>3) BCPD provided screen print of group rules which restricts who can access data.</li> <li>4) 30 Random videos were reviewed for proper classification, retention/ destruction, timestamp, use compliance, and authorized access.</li> <li>5) BCPD had an incident during the audit period triggering Minn. Stat. §13.825 Subdivision 2(1) – Data that Document Discharge of a Firearm by a Peace Officer.... are Public. The required mobile video data was classified as Public and was posted on the internet.</li> <li>6) Interviewed BCPD staff responsible for <i>Panasonic Arbitrator</i> system administration.</li> </ol>	Verified compliant
§13.825 Subd. 3	Verify Retention of Data	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Policy 423.7 – Retention of MVR Data</u> covering the process for retention of data based upon its classification.</li> <li>2) Data is retained for a minimum of 180 Days unless otherwise classified by statute or BCPD policy.</li> <li>3) <i>Panasonic Arbitrator</i> is configured to retain data for specified periods based upon its categorization.</li> <li>4) BCPD provided screen print of <i>Panasonic Arbitrator</i> data categorization and retention schedule.</li> <li>5) Interviewed BCPD staff responsible for <i>Panasonic Arbitrator</i> system administration.</li> </ol>	Verified compliant
§13.825 Subd. 4	Verify Access by Data Subjects	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Policy 423.9.2 Access to Recordings</u>, <u>Policy 423.9.1 Copies of Recorded Media</u>, and <u>Policy 804.2 – Public Requests for Records</u>.</li> <li>2) BCPD has an online Data Request Portal where subjects can request BWC video.</li> <li>3) Interviewed BCPD staff responsible for <i>Panasonic Arbitrator</i> system administration.</li> </ol>	Verified compliant
§13.825 Subd. 5	Verify Inventory of <i>Panasonic Arbitrator</i> Technology	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Policy 423.11 – MVR Administrator Responsibilities</u>.</li> <li>2) BCPD maintains an inventory of 48 cameras which includes two spares. Cameras are assigned a unique serial number and each officer is assigned their own BWC.</li> <li>3) BCPD provided documentation of the total number of devices and device assignments.</li> <li>4) BCPD provided screen capture showing daily log of deployed devices.</li> <li>5) BCPD has <u>Policy 423 Mobile Video Recorders</u>.</li> <li>6) BCPD provided screen print of the total amount of data space used to store the recordings.</li> </ol>	Verified compliant

MN Statute Requirement	Audit Objective	Audit Procedure	Audit Results
§13.825 Subd. 6	Verify Use of Agency-Issued Devices	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD MVR Policy 423.3 - Officer Responsibilities</u>, and <u>Policy 423.5 Use of Recorders</u>.</li> <li>2) Interviewed BCPD staff responsible for <i>Panasonic Arbitrator</i> system administration.</li> </ol>	Verified compliant
§13.825 Subd. 7	Verify Authorization to Access Data	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD BWC Policy 423.9.2 – Access to Recordings</u>.</li> <li>2) Reviewed <u>BCPD BWC Policy 423.1(e) – MVR Administrator Responsibilities</u>.</li> <li>3) BCPD provide screen print of authorized users and their applicable roles.</li> <li>4) Interviewed BCPD staff responsible for <i>Panasonic Arbitrator</i> system administration.</li> </ol>	Verified compliant
§13.825 Subd. 8	Verify Sharing among Agencies	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Policy 423.9,1 – Copies of Recorded Media</u>.</li> <li>2) Interviewed BCPD staff responsible for <i>Panasonic Arbitrator</i> system administration.</li> </ol>	Verified compliant
§13.825 Subd. 9	Verify Biennial Audit	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Policy 423.11(f) - MVR Administrator Responsibilities</u>.</li> <li>2) A copy for the prior audit was provided.</li> </ol>	Verified compliant
§13.825 Subd. 10	Verify Notification to the Bureau of Criminal Apprehension	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Policy 423.11(g) – MVR Administrator Responsibilities</u>.</li> <li>2) The Brooklyn Center Police Department has had no reported security breaches.</li> </ol>	Verified compliant
§13.825 Subd. 11	Verify Portable Recording System vendor	<ol style="list-style-type: none"> <li>1) Data is stored on a local server and is backed-up daily. <i>Panasonic Arbitrator</i> system is housed on a local City of Brooklyn Center server. No third-party storage or access occurred during the audit period.</li> <li>2) No new vendors have been engaged to trigger reporting under this requirement.</li> <li>3) Interviewed BCPD staff responsible for <i>Panasonic Arbitrator</i> system administration.</li> </ol>	Verified compliant
§13.825 Subd. 12	Verify Penalties for Violation	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Policy 423.14 – Accountability</u>.</li> </ol>	Verified compliant
§626.8473	Verify Portable Recording Systems Adoption; Written Policy Required	<ol style="list-style-type: none"> <li>1) Reviewed <u>BCPD Police 423 – Mobile Video Recorders</u>.</li> <li>2) Interviewed BCPD staff responsible for <i>Panasonic Arbitrator</i> system administration.</li> </ol>	Verified compliant

I hereby attest to the fact that the City of Brooklyn Center Police Department has taken and currently maintains reasonable, appropriate, and effective operating procedures, policies, and management resulting in statutory compliance of the Brooklyn Center Portable Recording System (Body-Worn Camera).

The Department has implemented proper security measures to share, protect and dispose of the recordings in their possession in accordance with current Minnesota State Statutes –

§13.825 – Portable Recording Systems

§626.8473 – Portable Recording Systems Adoption; Written Policy Required

This report was prepared exclusively for the City of Brooklyn Center and the Brooklyn Center Police Department by True Blue Services, LLC. The findings in this report are impartial and based on information and documentation provided by the city and examined by this examiner.

This audit was conducted by and attested to by:



Corinne Becker  
Owner  
True Blue Services, LLC