

**South St. Paul Police Department
Portable Recoding System Biennial Audit
Executive Summary
October 10, 2024**

At the request of the South St. Paul Police Department, LOGIS has conducted the biennial audit of the South St. Paul Police Department Portable Recording System pursuant to Minnesota Statute §13.825 Subd 9.

Minnesota Statute §13.825 data elements include:

- Data Classification
- Retention of Data
- Access by Data Subjects
- Inventory of Portable Recording System Technology
- Use of Agency-Issued Portable Recording Systems
- Authorization to Access Data
- Sharing Among Agencies
- Biennial Audit
- Notification to the BCA
- Portable Recoding System Vendor

After analysis of the statutory requirements and evaluation of South St. Paul Police Department's management and use of Portable Recording System (PRS) technology LOGIS has found the South St. Paul Police Department (SSPPD) has met the requirements for compliance with Minnesota Statute §13.825 based on the following findings:

Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
Item #1	§13.825 Subd 2	Data collected is classified per statute	<p>Reviewed SSPPD Policy 802, 803, 419.6 for data classification</p> <p>SSPPD Policy covers the process for classification of data when entered in the PRS</p> <p>Reviewed Axon PRS data classification configurations</p>	No discrepancies found.
Item #2	§13.825 Subd 3	Retention of data	<p>Reviewed SSPPD Policy 802.2, 802.3, 419.10</p> <p>Policy covers the process for retention of data based upon its classification</p> <p>Data is retrained for a minimum of 180 days unless otherwise classified by statute</p> <p>PRS is configured to retain data for specified periods based upon classification</p> <p>Reviewed PRS configuration for data retention settings</p>	No discrepancies found.

Item #3	§13.825 Subd 4	Access by data subjects	<p>Reviewed SSPPD Policy 802.4 thru 802.7, 803.5</p> <p>Policies cover the procedures for releasing data to subjects when request from the SSPPD Custodian of Records</p>	No discrepancies found.
Item #4	§13.825 Subd 5	Inventory of PRS technology	<p>Reviewed SSPPD Policy 419.4, 419.8, 419.10</p> <p>SSPPD maintains an inventory of 44 active cameras, each camera is assigned to a unique member of the SSPPD</p> <p>Procedures for using the PRS is provided thru the SSPPD Field Training Program – Step 1 – Task 20 Department Computers and Office Machines</p> <p>Reviewed PRS configuration for camera inventory and unique assignment to individuals</p>	No discrepancies found.



Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
Item #5	§13.825 Subd 6	Use of agency-issued devices	Reviewed SSPPD Policy 419.9 SSPPD has a specific policy prohibiting personal devices from being worn by members and used for agency purpose	No discrepancies found.
Item #6	§13.825 Subd 7	Authorization to access data	Reviewed SSPPD Policy 419.8 SSPPD policy prohibits access to data unless there is a specific need to know	No discrepancies found.
Item #7	§13.825 Subd 8	Sharing among agencies	Reviewed SSPPD Policy 803.3, 803.4, 803.5, 803.6 SSPPD Policies includes guidance and procedures for sharing data with other agencies	No discrepancies found.
Item #8	§13.825 Subd 9	Biennial audit	Reviewed SSPPD Policy 419.8 SSPPD Policy indicates that a biennial audit must be done pursuant to MN Statute §13.825	No discrepancies found.

Item #9	§13.825 Subd 10	Notification to the BCA	Reviewed SSPPD Policy 419.8 SSPPD Policy indicates that BCA notification must occur when new equipment is purchased that would expand the departments use of PRS	No discrepancies found.
Item #10	13.825 Subd 11	PRS vendor	SSPPD has implemented the Axon Body 4 operating system v1.2432	N/A

This executive summary is exclusively for the South St. Paul Police Department. The findings of the Portable Recoding Systems Audit are impartial and based on information and documentation provided by the South St. Paul Police Department and examined by LOGIS Information Security staff and management.

Local Government Information Systems (LOGIS) attested this audit on October 10, 2024:

Patrick Buie

Patrick Buie
LOGIS Information Security Specialist

Daniel Salmey

Daniel Salmey, Commander, City of South St. Paul Police Department

Respectfully submitted to the follow:

Daniel Salmey, City of South St. Paul, Police Commander
Legislative Commission on Data Practices
Legislative Law Library