

# Minnesota Security Consortium - MNSec

*Bringing Information Security to Local Minnesota Governments*

## Oakdale Police Department 2025 Body-Worn Camera (BWC) Audit

### Executive Summary Report

Oakdale Police Department

May 15, 2025



# Minnesota Security Consortium - MNSec

*Bringing Information Security to Local Minnesota Governments*

## **Background:**

Oakdale Police Department retained Minnesota Security Consortium to audit its agency's use of Body-Worn Camera (BWC, see Definitions Section below) program against the requirements of Minn. Stat. § 13.825 and Minn. Stat. § 626.8473. The Minnesota Security Consortium does not operate or have access to their BWC systems, therefore allowing it to audit the systems as an independent auditor. The Oakdale Police Department provided their administrative access to the Motorola/WatchGuard system during the audit to review audit criteria. Interview and auditing of the Motorola/WatchGuard system was conducted with the Oakdale Police Department's Sergeant in charge of the BWC program and reports to the Chief of policy on this matter.

## **Definitions:**

For the purposes of this audit and report, the use of the term Body-Worn Camera (BWC) systems shall be the same as the State Statute definition of "Portable Recording Systems," as defined by Minn. Stat. § 13.825, Subd. 1 (b) as follows:

"portable recording system" means a device worn by a peace Officer that is capable of both video and audio recording of the Officer's activities and interactions with others or collecting digital multimedia evidence as part of an investigation

"portable recording system data" means audio or video data collected by a portable recording system.

"redact" means to blur video or distort audio so that the identity of the subject in a recording is obscured sufficiently to render the subject unidentifiable.

## **Audit Period and Scope:**

The Audit Period covered by this report covers the period 4/1/23 to 3/30/25.

The Oakdale Police Department uses the cloud-based Motorola/WatchGuard video system for its BWC program. Although their Motorola/WatchGuard system records in both in-squad cameras as well as BWC videos, the scope of the audit focused only on BWC video data.

# Minnesota Security Consortium - MNSec

*Bringing Information Security to Local Minnesota Governments*

## **Required Public Hearing:**

Pursuant to Minn. Stat. § 626.8473, Subd. 2, Oakdale Police Department allowed for public comment regarding its new BWC Program.

The City of Oakdale conducted a public survey about Body-Worn Cameras between September 26, 2023, and October 24, 2023. Community input was also possible at the Oakdale Body Worn Camera Program Open House on October 23, 2022. The notice of the meeting was published on the city's public website and social media ahead of time.

## **Policy**

Oakdale Police Department has a BWC Policy in place entitled, "Policy #423: Body-Worn Cameras." Their Policy was reviewed to ensure that it contained some of the new 2024 Minn. Stat. § 13.825 statutory required elements. They continue to review and update their policies on a regular basis, then publish the newest version to their web site:

<https://www.oakdalemn.gov/DocumentCenter/View/6608/Body-Worn-Camera-Policy-PDF>

## **Officer use of BWC Equipment**

Oakdale Police Department's "Policy #423: Body-Worn Cameras" requires that Officers wear their BWC equipment and activate it during specific instances.

Approximately 30 Random Samples of dispatch Calls for Service were compared to the Motorola/WatchGuard video library to determine if they had been recording videos during those calls in accordance with their policy. In all cases, each Patrol Officer appeared to be using their BWC appropriately and activating recordings as outlined in the policy section entitled, "Policy #423: Body-Worn Cameras."

# Minnesota Security Consortium - MNSec

*Bringing Information Security to Local Minnesota Governments*

## **Data Classification and Retention**

Oakdale Police Department treats BWC data as private unless it is permitted to be released in accordance with the provisions of Stat. § 13.825, Subd. 2.

At the time of the audit, there had been no Court mandated BWC data disclosures.

The Oakdale Police Department set up its data classification and retention schedule for BWC videos in the administrative settings of the Motorola/WatchGuard console. BWC Data is currently retained for a minimum of 90 Days, as required by Minn. Stat. §13.825, Subd. 3 (a).

When the BWC Data involves the use of force, discharge of a firearm by an Officer, or when the event triggers a formal complaint against the peace Officer, the BWC Data is retained for a minimum of 1 year in accordance with Minn. Stat. §13.825, Subd. 3 (b).

At the time of the audit, Oakdale Police Department has set that Retention Period for formal complaints to indefinite.

In addition, all BWC footage related to discharge of a firearm by a peace Officer in the course of duty as defined by Minn. Stat. § 626.8473, Subd. 2 (1), was reviewed during the audit, due to the sensitive nature of these events. There was one reported Discharge of Firearms incident during this audit period, and the audit of each officer revealed that they all used their BWC's appropriately. The retention period for these incidents were set to "Use of Force" and they are retained for 7 years.

For specific types of Calls for Service (CFS), The Oakdale Police Department Records Staff also reviews related BWC videos to ensure all related video have the same classification. Any modifications to the Classification are auditable in the Motorola/WatchGuard audit trail. Sampled BWC data was examined for Modifications to Classification tags. The Motorola/WatchGuard audit trail indicated who and when the re-classification was made.

The Oakdale Police Department was compliant with its Classification and Retention requirements based on Statute, Minn. Stat. § 626.8473, Subd. 2. And Subd. 3.

# Minnesota Security Consortium - MNSec

*Bringing Information Security to Local Minnesota Governments*

## **Access by Data Subjects:**

Oakdale Police Department processes public BWC data requests, via their online "Police Reports:"

<https://ci.oakdale.mn.us/287/Police-Reports>

Citizens can also make a request for their privately classified BWC data by visiting front desk of the Police Department lobby, using the paper form "Data Request Form." This form can also be emailed into the Police Records Department at [policerecords@oakdalemn.gov](mailto:policerecords@oakdalemn.gov).

Oakdale Police Department Commanders stated they redact BWC Data, using Motorola's redaction software, when released to Data Subjects. They stated approximately 60 requests were made during the audit period.

The Oakdale Police Department was compliant with this aspect of the Statute.

## **Use of Agency-Issued BWC:**

Minn. Stat. § 13.825, Subd. 6 states that:

"While on duty, a peace officer may only use a portable recording system issued and maintained by the officer's agency in documenting the officer's activities."

Oakdale Police Department "Policy #423: Body-Worn Cameras," section "423.3 Member Responsibilities," states:

"Officers may use only department-issued BWCs in the performance of official duties for this agency or when otherwise performing authorized law enforcement services as an employee of this department."

The Oakdale Police Department was compliant with this aspect of the Statute.

# Minnesota Security Consortium - MNSec

*Bringing Information Security to Local Minnesota Governments*

## **Authorization to Access Data:**

The Oakdale Police Department allows its Officers to review non-public BWC data for legitimate, specified law enforcement purposes. Access is enforced using user accounts and roles/rights in the Motorola/WatchGuard system.

BWC Data was sampled and audited across the audit period. Results of sampling the BWC Data and its related audit trail in the Motorola/WatchGuard system, showed that it was either not viewed at all, viewed by the Officer who recorded the data, or by the Records Department.

All views and access were consistent with Oakdale Police Department "Policy #423: Body-Worn Cameras" and Minn. Stat. § 13.825 Subd. 7, as authorized by the Chief of Police.

## **Sharing Among Agencies:**

Oakdale Police Department treats BWC as private and may only share BWC data with other agencies when permitted by Minn. Stat. § 13.825, Subd. 8 and Subd. 7.

The request for BWC footage requires that they have a legitimate, specified law enforcement purpose, as required by Minn. Stat. § 13.825, Subd. 7.

Oakdale Police Department processes BWC data requests by other agencies and documents the case number. Agencies can make their request via email or the online Data Request Form.

The Oakdale Police Department was compliant with these aspects of the Statute.

# Minnesota Security Consortium - MNSec

*Bringing Information Security to Local Minnesota Governments*

## **Biennial Audits:**

Oakdale Police Department has acknowledged that it intends to continue completing biennial audits of its BWC System, as required by Minn. Stat. § 13.825, Subd. 9. This was their first audit by the Minnesota Security Consortium. The Oakdale Police Department is compliant with this aspect of the Statute.

## **BWC System Vendors:**

At the time of the audit, Motorola/WatchGuard was the primary vendor and system for their BWC program. BWC videos were recorded, classified, and stored in Motorola/WatchGuard cloud-based system, called CommandCentral Evidence.

Because CommandCentral Evidence is a cloud-based solution, it is subject to the requirements of Minn. Stat. § 13.825, Subd. 11 (b), which requires Motorola/WatchGuard to follow the requirements of the FBI's CJIS Policy 5.9.2 and subsequent versions.

At the time of this audit, this was the best documentation we could find for the vendor's compliancy:

[https://www.motorolasolutions.com/en\\_us/compliance.html](https://www.motorolasolutions.com/en_us/compliance.html)

<https://www.motorolasolutions.com/content/dam/msi/docs/products/command-center-software/emergency-call-handling/securing-public-safety-software-in-the-cloud-final-whitepaper.pdf>

Motorola / Watchguard was still not listed as an approved BCA Vendor for BWC data but is listed for RMS and LPR products. Minnesota BCA has indicated that Motorola is in the process of going through the vetting process. This does not mean that Motorola is not CJIS Compliant.

<https://dps.mn.gov/divisions/bca/bca-divisions/mnjis/Pages/bca-vendor-screening-program.aspx>

# Minnesota Security Consortium - MNSec

*Bringing Information Security to Local Minnesota Governments*

## Conclusion:

Based on the results of the Oakdale Police Department BWC Audit conducted by Minnesota Security Consortium, we can demonstrate that they are using the Motorola/WatchGuard BWC System in accordance with the requirements of Minn. Stat. § 13.825 and Minn. Stat. § 626.8473.

This Audit was conducted and attested to by:



---

Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium

Submitted to:

- Oakdale Chief of Police
- Oakdale City Council, via the Chief of Police
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Legislative members as specified by Statute