

INDEPENDENT AUDIT REPORT

Brady Juell
Chief of Police
Savage Police Department
6000 McColl Dr.
Savage, MN 55378

Dear Chief Juell:

An independent audit of the Savage Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on April 22, 2025. The objective of the audit was to verify Savage Police Department's compliance with Minnesota Statutes §§13.825 and 626.8473.

Data elements the audit includes:

Minnesota Statute §13.825

- 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

Minnesota Statute §626.8473

- Public Comment
- Portable Recording System Policy

The Savage Police Department is located in Scott County, Minnesota and is authorized for thirty-eight (38) peace officers. Savage Police Department utilizes Axon body-worn cameras and Evidence.com cloud-based evidence management storage. The audit covers the time period March 28, 2023, through March 31, 2025.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Savage Police Department BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. Savage Police Department had no instances of the discharge of a firearm by a peace officer, use of force that resulted in substantial bodily harm, requests from data subjects for the data to be made accessible to the public, or court orders directing the agency to release the BWC data to the public.

No discrepancies noted.

Audit Requirement: Retention of Data

Determine if the data collected by BWC's are appropriately retained and destroyed in accordance with statutes.

The Savage Police Department utilizes the City of Savage Records Retention Schedule and agency-specified retention periods in Evidence.com. At the conclusion of a BWC recording, officers assign metadata, including an Evidence.com category, to the recording. Each category has an associated retention period. Upon reaching its retention date, evidence is systematically deleted. Deletion of the data is captured in the audit trail.

A report of all BWC data collected and deleted during the audit periods was produced from Evidence.com. Records from the Evidence Created Report were reviewed, and the date and time the data was created was verified against the deletion date. Each of the records were deleted or maintained in accordance with the record retention schedule. All records were maintained for at least the minimum ninety (90) days required by statute.

The Savage Police Department has received no requests from data subjects to retain BWC data beyond the applicable retention period.

Sergeants monitor BWC data for proper categorization to ensure BWC data are appropriately retained and destroyed.

No discrepancies noted.

Audit Requirement: Access by Data Subjects

Determine if individuals who are the subject of collected data have access to the data, and if the data subject requests a copy of the data, other individuals who do not consent to its release must be redacted.

BWC data is available to data subjects and access may be requested by submission of a Savage Police Department Data Request Form or through the City of Savage Online Public Data Request portal. During the audit period, the Savage Police Department had received no requests to view BWC data, but did receive and fulfill requests for copies of BWC data from data subjects. Data subjects who had not consented to the release of data were redacted. Requests are documented in the records managements system dissemination log.

No discrepancies noted.

Audit Requirement: Inventory of Portable Recording System Technology

Determine the total number of recording devices owned and maintained by the agency; a daily record of the total number of recording devices actually deployed and used by officers, the policies and procedures for use of portable recording systems by required by section 626.8473; and the total amount of recorded audio and video collected by the portable recording system and maintained by the agency, the agency's retention schedule for the data, the agency's procedures for destruction of the data, and that the data are available to the public.

Savage Police Department's BWC inventory consists of forty-three (43) devices. An inventory report produced from Evidence.com detailed the total number of recording devices owned and maintained by the agency. The inventory included the device model, serial number, device name, officer assigned to the device, date of last upload, device status, error status, firmware version, warranty date, date last docked, and camera state.

The Savage Police Department's BWC policy governs the use of portable recording systems by peace officers while in the performance of their duties. The policy requires officers to be equipped with a BWC and to ensure the recorder is in good working order prior to going into service. If the recorder is not in working order, or the officer becomes aware of a malfunction at any time, they are required to promptly report the failure to the supervisor and obtain a functioning device as soon as practicable.

Peace officers were trained on the use of Axon BWC's by Axon-trained trainers at the time of implementation. Newly hired officers are trained as part of their field training program.

Officers working on randomly selected dates, and randomly selected calls for service, were verified against the Evidence Created Report and confirmed that BWCs are being deployed and officers are wearing and activating their BWCs. A comparison between the total number of BWC videos created per quarter and total calls for service shows a consistent collection of BWC data.

Evidence.com queries and the Evidence Created Report detail the total amount of BWC data created, stored/maintained, and deleted.

The Savage Police Department utilizes the City of Savage Records Retention Schedule and agency specified retention in Evidence.com. BWC video is fully deleted from Evidence.com upon reaching its scheduled deletion date. Metadata and audit trails are maintained in Evidence.com after deletion of BWC audio and video. BWC data is available upon request, and access may be requested by submission of a Savage Police Department Body Worn Camera Video Release Form.

No discrepancies noted.

Audit Requirement: Use of Agency-Issued Portable Recording Systems

Determine if peace officers are only allowed to use portable recording systems issued and maintained by the officer's agency.

The Savage Police Department's BWC policy states that Officers are prohibited from using personally owned recording devices while on-duty without the express consent of the Patrol Sergeant.

No discrepancies noted.

Audit Requirement: Authorization to Access Data

Determine if the agency complies with sections 13.05, Subd. 5, and 13.055 in the operation of portable recording systems and in maintaining portable recording system data.

Sergeants conduct random reviews of BWC data to ensure videos are properly classified and that BWCs are being used in compliance with policy.

User access to BWC data is managed by the assignment of roles and permissions in Evidence.com. Permissions are based on staff work assignments. Roles and Permissions are administered by a Sergeant. Access to Evidence.com is password protected and requires dual authentication.

The agency's BWC policy governs access to BWC data. Agency personnel are authorized to access BWC data pursuant to lawful process and in accordance with policy, statute, and the Minnesota Data Practices Act. Access to BWC data is captured in the audit trail. The BWC policy states that any member who accesses or releases recordings without authorization may be subject to discipline.

When BWC data is deleted, its contents cannot be determined. The Savage Police Department has had no security breaches. A BCA CJIS Security audit was in process at the time of this audit.

No discrepancies noted.

Audit Requirement: Sharing Among Agencies

Determine if nonpublic BWC data shared with other law enforcement agencies, government entities, or federal agencies is in accordance with statute.

The Savage Police Department's BWC and Records Maintenance and Release policies govern the sharing of nonpublic BWC data. BWC data may be shared pursuant to lawful process and in accordance with policy, statute, and the Minnesota Data Practices Act. Law enforcement agencies seeking access to BWC data are required to submit a written request. Written requests are maintained in the case file and the release of data is documented in the records management system dissemination log. Sharing of data is captured in the audit trail. An Evidence.com Sharing Audit Report provides documentation of data shared electronically through Evidence.com.

No discrepancies noted.

Audit Requirement: Biennial Audit

Determine if the agency maintains records showing the date and time the portable recording system data were collected, the applicable classification of the data, how the data are used, and whether data are destroyed as required.

Evidence.com and the Evidence Created Report document the date and time portable recording system data were collected and deleted. All BWC data for the audit period is classified as private or nonpublic data. The Evidence.com audit trail and the records management system dissemination log document how the data are used. The audit trail is maintained in Evidence.com after deletion of video.

No discrepancies noted.

Audit Requirement: Portable Recording System Vendor

Determine if portable recording system data stored in the cloud, is stored in accordance with security requirements of the United States Federal Bureau of Investigation Criminal Justice Information Services Division Security Policy 5.4 or its successor version.

An Axon CJIS Compliance White paper outlines the specific security policies and practices for Evidence.com and how they are compliant with the CJIS Security Policy. Axon has signed the CJIS Security Addendum in all states and has performed statewide CJIS-related vendor requirements in Minnesota. Axon has incorporated the CJIS Security Addendum by reference into the Axon Master Services and Purchase Agreement. Axon maintains signed CJIS Security Addendum certification pages for Axon personnel. Authorized Axon personnel are required to complete Level 4 CJIS Security Training upon assignment and biennially thereafter.

No discrepancies noted.

Audit Requirement: Public Comment

Determine if the law enforcement agency provided an opportunity for public comment before it purchased or implemented a portable recording system and if the governing body with jurisdiction over the budget of the law enforcement agency provided an opportunity for public comment at a regularly scheduled meeting.

The Savage Police Department solicited public comment prior to purchase and implementation of the body worn camera program. Public comment was solicited through social media, the local newspaper, and an open meeting at the City of Savage Council Chambers on July 18, 2018. The Savage City Council adopted a resolution at their August 20, 2018, Council meeting to adopt the BWC policy.

No discrepancies noted.

Audit Requirement: Body-worn Camera Policy

Determine if a written policy governing the use of portable recording systems has been established and is enforced.

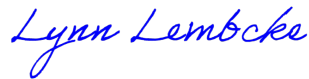
The Savage Police Department has established and enforces a BWC policy. The policy was compared to the requirements of Minn. Stat. § 626.8473. The policy includes all minimum requirements of Minn. Stat. § 626.8473, Subd. 3(b) with the exception of Subd. 3(b) (3), (4) and (5). Policy was updated to include all minimum requirements prior to the completion and submission of the final BWC report. The BWC policy is posted on the agency's website.

Discrepancy noted.

This report was prepared exclusively for the City of Savage and Savage Police Department by Lynn Lembcke Consulting. The findings in this report are impartial and based on information and documentation provided and examined.

Dated: July 13, 2025

Lynn Lembcke Consulting



Lynn Lembcke