

INDEPENDENT AUDIT REPORT

Chief Steve Hansen
Oak Park Heights Police Department
14168 Oak Park Blvd.
Oak Park Heights, MN 55082

Dear Chief Hansen:

An independent audit of the Oak Park Heights Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on December 11, 2025. The objective of the audit was to verify Oak Park Heights 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
- Body-worn Camera Policy

The Oak Park Heights Police Department is located in Washington County and is authorized for twelve (12) peace officers. The Oak Park Heights Police Department utilizes Motorola WatchGuard BWCs and WatchGuard Evidence Library software. BWC data is stored on a local file server. The audit covers the time period December 1, 2023, through January 15, 2026.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Oak Park Heights Police Department BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. The Oak Park Heights 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 that the data collected by BWC's are appropriately retained and destroyed in accordance with statutes.

The Oak Park Heights Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention periods in WatchGuard. At the conclusion of a BWC recording, a WatchGuard category type is assigned. Each category type has an associated retention period. Upon reaching the retention date, data is systematically deleted.

Event log reports consisting of all BWC data collected and deleted during the audit period were produced from WatchGuard. Records from the purged event log report were reviewed and the date the data was collected was verified against the delete date. Each of the records were deleted in accordance with the record retention schedule, and all BWC data was retained for at least the minimum ninety (90) days required by statute.

Active BWC data and audit logs are accessible in Evidence Library. The server log maintains a listing of active and deleted BWC data.

During the audit period, the Oak Park Heights Police Department received one request from data subjects to retain BWC data beyond the applicable retention period. Data requested had a permanent retention period.

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 an Oak Park Heights Police Department Information Disclosure Request form. During the audit period, the Oak Park Heights Police Department had received both requests to view and requests for copies of BWC video from data subjects. Data subjects who had not consented to the release of the data were redacted. Data requests are documented on an Excel spreadsheet, and Information Disclosure Request forms are maintained in a file.

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.

Oak Park Heights Police Department's BWC inventory consists of twelve (12) devices. Device inventory is maintained in the WatchGuard Evidence Library and a Word document.

The Oak Park Heights Police Department's BWC policy governs the use of BWCs by peace officers while in the performance of their duties. The policy requires officers to inspect their BWC to ensure it is in good working order and conduct a function test at the beginning of each shift. Officers noting a malfunction or damage to their BWC are required to report it to the BWC coordinator or on-duty supervisor as soon as practicable and obtain a functioning BWC if possible.

Peace officers were trained on the use of the BWC system and policies and procedures during 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 event log reports and confirmed that BWCs are being deployed and used by officers. A review of the total amount of BWC data collected per quarter shows that BWC data is being consistently collected.

The total amount of active data is accessible in the WatchGuard Evidence Library. The total amount of active and deleted data is available in event log reports.

The Oak Park Heights Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention in WatchGuard. BWC video is fully deleted upon reaching the scheduled deletion date. Meta data information is maintained on the server. BWC data is available upon request, and access may be requested by submission of an Information Disclosure Request 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 Oak Park Heights Police Department's BWC policy states that only department-issued BWCs should be used.

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.

The Chief of Police and Sergeants conduct reviews of BWC videos to ensure that BWC data is properly labeled and that BWCs are being utilized in compliance with policy.

Nonpublic BWC data is only available to persons whose work assignment reasonably requires access to the data. User access to BWC data is managed by the assignment of group roles and permissions in WatchGuard. Permissions are based on staff work assignments. Permissions are administered by the Chief of Police. Access to Evidence Library is password protected and requires dual authentication.

The BWC policy governs access to BWC data. Authorized personnel may access and view BWC data for legitimate department related purposes. Access to BWC data is captured in the audit log. The BWC policy states that any member who accesses or releases BWC media without authorization may be subject to discipline.

When BWC data is deleted, its contents cannot be determined. The Oak Park Heights Police Department has had no security breaches. A BCA CJIS security audit was conducted in June of 2023.

No discrepancies noted.

Audit Requirement: Sharing Among Agencies

Determine if non-public BWC data is shared with other law enforcement agencies, government entities, or federal agencies.

The Oak Park Heights Police Department's BWC policy allows for the sharing of BWC data with other law enforcement agencies and government entities only for legitimate, specified law enforcement purposes. Law enforcement agencies seeking access to BWC data are required to submit a written request. Sharing of data is documented in an Excel spreadsheet and copies of requests are maintained in a request folder.

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.

WatchGuard Evidence Library and the server event log reports document the date and time portable recording system data was collected and deleted. All BWC data collected during the audit period is classified as private or nonpublic data. The WatchGuard audit logs and an Excel spreadsheet document how the data are used and shared.

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.

Oak Park Heights Police Department's BWC data is stored on a local file server. The server is located in a secure area with limited access. The server is password protected. Access to the server is managed by the Chief of Police.

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 Oak Park Heights City Council approved the purchase of body-worn cameras their September 22, 2015, council meeting. The BWC system was purchased and implemented prior to the requirement of Minn. Statute § 626.8473, Subd. 2.

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 Oak Park Heights Police Department 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). The Oak Park Heights Police Department's BWC policy is posted on the agency's website.

No discrepancies noted.

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

Dated: February 17, 2026

Lynn Lembcke Consulting



Lynn Lembcke