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BCA

2026 Body Worn Camera (BWC) Audit

Executive Summary Report

Prepared for the Minnesota Bureau of Criminal Apprehension (BCA)

June 3, 2026



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Background:

The BCA retained the Minnesota Security Consortium (MNSec) to audit its agency's use of its 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 (MNSec) does not operate or have access to their BWC systems, therefore allowing it to audit the systems as an independent auditor. The BCA provided their administrative access to the AXON system during the audit to review audit criteria. Interviews and auditing of the AXON system were conducted with the BCA Command staff during the audit process.

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; and

"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 1/1/2024 to 12/31/2025.

BCA uses the cloud-based AXON video system for its BWC program. Their AXON system was treated as their only primary source of all BWC data and was the focus of this audit. All AXON BWC data videos had date and time stamps of when the data was collected. insert

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Required Public Hearing:

Pursuant to Minn. Stat. § 626.8473, Subd. 2, BCA allowed requested public comment regarding its new BWC Program at the Bureau of Criminal Apprehension. This request was publicly posted on their website in August of 2021, and screenshots were provided during our first audit.

To maintain ongoing transparency, the BCA also maintains a public blog of its BWC program at:

<https://dps.mn.gov/divisions/bca/data-and-reports/bca-reports>

Bureau of Criminal Apprehension was compliant with this aspect of the Statute, Minn. Stat. § 626.8473, Subd. 2.

Department BWC Policy:

The BCA has a BWC Policy in place entitled, "Body-Worn Cameras: INV-7037." Their Policy was reviewed to ensure that it contained the basic elements as outlined in Minn. Stat. § 13.825 and Minn. Stat. § 626.8473, Subd. 3. We recommend that all BWC policies be reviewed by the BCA's legal and compliancy departments, as this audit does not render a legal opinion on policy matters.

As required by statute, they have posted their policy on their public web site, and keep it updated on a regular basis:

<https://assets.dps.mn.gov/files/bca/BCA-Body-Worn-Cameras-policy.pdf>

Officer use of BWC Equipment:

The BCA "Body-Worn Cameras: INV-7037" policy requires that BCA Agents wear their BWC equipment and activate it during specific instances. The BCA sworn agents that use BWCs are typically using them in investigative and/or search warrant situations, in contrast to a 911-dispatched agency where BWCs are triggered by various types of Call for Service. The BCA uses a case file approach to collecting and retaining BWC data of their own and of BWC data from other agencies for their cases. These retention schedules and purging follow the unique processes of the BCA. During the audit the BCA attested that they follow the Minnesota Government Data Practices Act and other applicable State Laws in the retention decision making processes.

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Data Classification and Retention:

BCA treats BWC data as “public, non-public, or confidential” in accordance with the provisions of Stat. § 13.825 and other governing statutes.

At the time of the audit, there were no Court mandated BWC data disclosures reported during this audit period.

BCA set up its data classification and retention schedule for BWC videos in the administrative settings of the AXON console. All BWC data is 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 a peace officer, or when the event triggers a formal complaint against the peace officer, the BWC data is retained for a minimum of one year in accordance with Minn. Stat. §13.825, Subd. 3 (b). At the time of the audit, BCA had set that Retention Period to a minimum of one year under their classification category, “Until manually deleted.” Death or Officer Involved Shooting (OIS) incidents are kept indefinitely. All other BWC videos are retained for usually two years or more until the case is completely closed and the command staff purges the case file BWC Data.

In addition, all BWC footage related to the 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. No incidents related to the discharge of a firearm by a peace officer were reported during this audit period.

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

Access by Data Subjects:

BCA processes BWC data requests in accordance with the Minnesota Government Data Practices Act and Minn. Stat. § 13.825.

The public can access the BCA’s “Data Requests” PDF form online from their website:

<https://dps.mn.gov/divisions/bca/Pages/your-data-rights.aspx>

Approval is made by the BCA’s In-House counsel and are approved based on legal considerations, with redaction being done by a special redaction unit.

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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.”

The BCA Policy “Body-Worn Cameras: INV-7037,” Section A (4) states:

“Employees shall only use BWCs and BWC equipment authorized by the BCA.”

The BCA practices are compliant with this part of the Statute.

Authorization to Access Data:

The BCA allows its agents to review their own BWC data, unless it is a Critical Incident as defined by their INV-7010 Policy. Access is enforced using user accounts and roles/rights in the AXON system.

Approximately 20 mostly random sampled BWC videos were examined during the audit process. AXON has a robust audit trail for each video, showing its initial upload and subsequent access by authorized users. In all the BWC videos examined, the AXON access logs showed legitimate access by agent(s) and supervisors.

All views and access were consistent with BCA “Body-Worn Cameras: INV-7037” and Minn. Stat. § 13.825 Subd. 7, as authorized by the Superintendent of the BCA or its authorized command staff.

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Sharing Among Agencies:

BCA Case Agents are permitted to share case files with other law enforcement agencies during joint investigations in which there is a legitimate, specified law enforcement purpose, as required by Minn. Stat. § 13.825, Subd. 7. These types of joint investigations are documented by a formal BCA Case Number and justifications noted in their RMS system.

BCA was compliant with this aspect of the Statute.

Biennial Audits:

BCA has acknowledged that it intends to continue completing biennial audits of its BWC System, as required by Minn. Stat. § 13.825, Subd. 9. This is their second audit. This year's audit covered the audit period, 1/1/2024 to 12/31/2025.

BCA is compliant with this aspect of the Statute.

BWC System Vendors:

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

Because Evidence.com is a cloud-based solution, it is subject to the requirements of Minn. Stat. § 13.825, Subd. 11 (b), which requires AXON to follow the requirements of the FBI's CJIS Policy 5.x and subsequent versions. AXON has published a CJIS White paper outlining its responsibilities for CJIS compliance, and it also stated that it has filed the appropriate CJIS Security Addendum with the State of Minnesota. The BCA had confirmed that AXON had been approved by the BCA, and that its previous Security Addendum had expired and was recently being renewed.

<https://trust.axon.com/?itemUId=eefdeb50-486d-4a61-8b8a-6999da6c5cb9&source=click>

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Conclusion:

Based on the results of the BCA BWC Audit conducted by the Minnesota Security Consortium (MNSec), we were able to demonstrate that BCA is using the AXON 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 (MNSec)

Submitted to:

- Superintendent and Deputy Superintendent of the BCA
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Legislative members, as specified by Statute
- MN Legislative Library