

Winnebago Police Department 2025 Body Worn Camera (BWC) Audit

Executive Summary Report

Prepared for City of Winnebago

July 23, 2026



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Background:

Winnebago Police Department 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 Winnebago Police Department 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 Winnebago Chief of Police 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 9/1/22 to 12/31/25.

Winnebago Police Department uses the Axon video system for its BWC program. Although their Axon system records both in-squad video as well as BWC videos, the scope of the audit focused only on BWC video data. Their Axon systems were 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.

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Required Public Hearing:

Pursuant to Minn. Stat. § 626.8473, Subd. 2, the Winnebago Police Department allowed for public comment regarding its new BWC Program during the Winnebago City Council Meeting held on July 12, 2022. The appropriate City Council Agenda notification and Meeting Minutes were reviewed during the audit.

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

Department BWC Policy:

Winnebago Police Department has an updated BWC Policy in place entitled, "Policy 427: Body-Worn Cameras." Their Policy was reviewed to ensure that it contained the required elements as outlined in Minn. Stat. § 626.8473, Subd. 3. In addition, Winnebago Police Department posts a publicly available copy of this policy on its public website:

<https://www.cityofwinnebago.com/index.php/departments/public-safety>

Officer use of BWC Equipment:

Winnebago Police Department policy "Policy 427: Body-Worn Cameras" requires that Officers wear their BWC equipment and activate it during specific instances.

Random samples of Calls for Service were taken and compared against the Axon video library to determine if they had been recording videos during those calls in accordance with their policy. In addition, the audit logs were examined to audit appropriate handling of existing BWC videos. In all cases sampled, the patrol officers appeared to be using their BWC appropriately and activating recordings as outlined in the policy section 427.5 entitled, "Activation of BWC."

Winnebago Police Department was compliant with its use of Access Control.

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Data Classification and Retention:

Winnebago 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 this audit, no Court mandated BWC data disclosures had been made during the audit period.

Winnebago Police Department 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 1 year in accordance with Minn. Stat. §13.825, Subd. 3 (b). At the time of the audit, Winnebago Police Department has set that Retention Period to a minimum of 1 year or more (until manually deleted) under their classification category of "Pending Review" for these types of BWC videos. If the incident involves loss of life, the videos will be retained indefinitely.

In addition, on specific types of calls, the Winnebago Chief of Police in charge of the BWC program also reviews related BWC videos to ensure that all related videos have the appropriate classification. Any modifications to the classification are auditable in the Axon audit trail. Sampled BWC data was examined for modifications to the classification tags. The Axon audit trail indicated who and when the re-classification was made. Samples examined during the audit showed that virtually all BWC Data was tagged with the correct classification and Retention Period.

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

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Access by Data Subjects:

Winnebago Police Department currently processes BWC data requests through the front desk of City Hall and would make a request to the Chief of Police. The public may also call or email the police department and request any data they are entitled to under the Statute. This request is then reviewed by the Chief prior to being approved.

Winnebago Police Department stated they redact BWC data when released to Data Subjects.

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.”

Winnebago Police Department “Policy 427: Body-Worn Cameras, Section 427.4 (a)” states:

“Only department-issued BWCs should be used (Minn. Stat. § 13.825, Subd. 6).”

Winnebago Police Department was compliant with part of the Statute.

Authorization to Access Data:

Winnebago Police Department allows its officers to review their own BWC data. Access is enforced using user accounts and roles/rights in the Axon system. The user accounts and roles were reviewed to be accurate and appropriate during the audit process.

BWC data was sampled and audited across the audit period, focusing between September 2025 and December 25. Results of sampling the BWC data, and its related audit trail in the Axon system, showed that it was either not viewed at all, viewed by the officer who recorded the data, or by a police supervisor. In approximately 13 samples of higher risk calls for service, BWC video metadata was reviewed during the audit process by the auditor and the Chief. In all samples, the BWC videos were shown to be viewed by the appropriate staff.

All views and access were consistent with Winnebago Police Department “Policy 427: Body-Worn Cameras” and Minn. Stat. § 13.825 Subd. 7, as authorized by the Chief of Police.

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Sharing Among Agencies:

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

Winnebago Police Department processes BWC data requests by other Agencies via email which must contain a legitimate, specified law enforcement purpose, as required by Minn. Stat. § 13.825, Subd. 7. Approximately 50 of these requests were made during the audit period.

Winnebago Police Department was compliant with this aspect of the Statute.

Biennial Audits:

Winnebago Police Department's new Chief of Police recently discovered that there had not been a BWC Audit conducted since the agency had implemented their new system.

Winnebago Police Department was not previously compliant with this aspect of the Statute. However, their new Chief of Police acknowledged that they intend to complete future biennial audits of its BWC System every 24 months, as required by Minn. Stat. § 13.825, Subd. 9.

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:

https://axon-static-site.s3.us-west-1.amazonaws.com/images/axon-2/a120c9a7-739e-4a55-aba7-72ed75156064_security-white-paper.pdf

AXON's Evidence.com is also listed as an approved vendor with the BCA's CJIS Vendor Screening Program.

Winnebago Police Department was compliant with this aspect of the Statute.

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Conclusion:

Based on the results of the Winnebago Police Department BWC Audit conducted by the Minnesota Security Consortium (MNSec), we were able to demonstrate that Winnebago Police Department is using the Axon BWC System in accordance with all the requirements of Minn. Stat. § 13.825 and Minn. Stat. § 626.8473, except for the bi-annual audit requirement, which is now being corrected.

This Audit was conducted and attested to by:

Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium (MNSec)

Submitted to:

- Winnebago Police Department Chief of Police
- Winnebago City Council
- Legislative Commission on Data Practices
- Ranking and Minority leaders of the House and Senate Public Safety committees