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Woodbury Public Safety Department 2021 ALPR Audit

Executive Summary

Prepared for City of Woodbury Department of Public Safety

November 10, 2021



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Background:

Woodbury Public Safety Department retained Minnesota Security Consortium in order to audit its agency's use of ALPR's against the requirements of MN Statute 13.824. Minnesota Security Consortium does not operate or have access to their ALPR systems, therefore allowing it to audit the systems as an independent auditor. Woodbury Public Safety Department had their last ALPR Audit in December of 2019, as required by Statute. Woodbury Public Safety Department had ALPR systems on up to 2 Squad Cars between December 2019 and June 2021, and no stationary ALPR units during this time period.

Department Policy & Procedures:

Woodbury Public Safety Department has an ALPR Policy in place entitled, "Policy 427: Automated License Plate Readers (ALPR)." They have been keeping their policy updated and have recently reviewed it. A review of this policy found that Woodbury Public Safety Department was compliant in this part of the statute.

Record Retention:

The Woodbury Public Safety Department ALPR Boss administrative control panel was no longer available at the time of the audit, however, the most recent reports in June 2021 showed no active hits or active reads, indicating they had purged. Previous inspection of the BOSS backend server affirmed that 60 day retention period was configured. In addition, sample read data was searched for during dates beyond 60 days. Woodbury Public Safety Department was found to be compliant with this part of the statute.

Data Security and Access Control:

The Woodbury Public Safety Department's ALPR system was protected by an Access Control system built into the BOSS backend server application. Members of the Woodbury Public Safety Department must undergo in-service training prior to being permitted to use the ALPR System. User accounts and role-based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrator is appointed by the Woodbury Public Safety Director/Police Chief.

A sampling of the most recent monthly Audits Reports was made to determine if the system is logging access by users properly. The Woodbury Public Safety Department was found to be compliant in this part of the statute.

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Data Classification:

Woodbury Public Safety Department ALPR Data that has been collected is classified as private unless access is permitted by law. Public data requests of data collected on a license plate owner's vehicle is readily available through a proper records request via the Woodbury Public Safety Department. Citizens can fill out the agency's Woodbury MN Public Info Center form or by filling out a similar form at the Public Safety Front Desk. Woodbury Public Safety Department was found to be compliant with this part of the statute.

Sharing Among Law Enforcement Agencies:

Appropriate sharing of ALPR data is conducted through inter-agency requests. Agencies can also fill out the online Woodbury MN Public Info Center form or by filling out a similar form at the Public Safety Front Desk or other personnel as authorized by the Public Safety Director/Police Chief. The requests are documented by agency name, requesting party and case number. As a result of these findings, Woodbury Public Safety Department was found to be compliant with this part of the statute.

Public Log of Use:

The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. Woodbury Public Safety Department compiles monthly reports that contain the requirements of 13.824 Subd. 5. Sample reports from the past two months were reviewed during the audit process. These public logs of use are readily available through a proper records request through the Woodbury Public Safety Department. Woodbury Public Safety Department was found to be compliant with this part of the statute.

Notification to Bureau of Criminal Apprehension:

Woodbury Public Safety Department has made the required original notification to the Bureau of Criminal Apprehension. Upon the termination of their mobile ALPR program in June 2021, they provided the BCA with their notice and their listing was removed front he BCA website. Woodbury Public Safety Department was found to be compliant with this part of the statute.

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Biennial Public Accountability Audit:

Woodbury Public Safety Department installed their ALPR system in 2015. They had their first ALPR Audit in September 2017 and continued to plan for an independent audit every two years, per MN Statute 13.824. Command and IT Staff were very cooperative throughout the entire audit process and understand the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of their ALPR Reports. Woodbury Public Safety Department was found to be compliant with this part of the statute.

Breach Notification:

The Woodbury Public Safety Department utilizes the City's Incident Response Policy which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. Woodbury Public Safety Department was found to be compliant with this part of the statute

Conclusion:

Based on the results of the Woodbury Public Safety Department ALPR Audit conducted by Minnesota Security Consortium, we can demonstrate that they were using the ALPR System as an effective law enforcement tool for the purpose of combating auto theft and other crimes linked to a vehicle license plates. The Woodbury Public Safety Department also demonstrated that their security, public accountability, and administration of the program followed MN Statute 13.824.

This Audit was conducted and attested to by:



Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium.

Submitted to:

- Woodbury Public Safety Director/Police Chief
- Minnesota Commissioner of Administration
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Chairs of Legislative Committees
- Minnesota Legislative Library