

# Minnesota Security Consortium – MNSec

*Bringing Information Security to Local Minnesota Governments*

# Inver Grove Heights Police Department 2021 ALPR Audit

## Executive Summary

Prepared for City of Inver Grove Heights

December 21, 2021



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## **Background:**

Inver Grove Heights Police 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. Inver Grove Heights Police Department had their last ALPR Audit in December of 2019, as required by Statute. Inver Grove Heights Police Department had ALPR systems on up to 2 Squad Cars between December 2019 and May 2020, and no stationary ALPR units during this time period.

## **Department Policy & Procedures:**

Inver Grove Heights Police Department has an ALPR Policy in place entitled, "Policy 25: Automated License Plate Reader." They have been keeping their policy updated and have recently reviewed it in June of 2020. A review of this policy found that Inver Grove Heights Police Department was compliant in this part of the statute.

## **Record Retention:**

The Inver Grove Heights Police Department ALPR Boss administrative control panel was no longer available at the time of the audit, however, the most recent reports in July 2020 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. Inver Grove Heights Police Department was found to be compliant with this part of the statute.

## **Data Security and Access Control:**

The Inver Grove Heights Police Department's ALPR system was protected by an Access Control system built into the BOSS backend server application. Members of the Inver Grove Heights Police 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 Inver Grove Heights Police Department Chief of Police. The Inver Grove Heights Police Department was found to be compliant in this part of the statute.

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## **Data Classification:**

Inver Grove Heights Police 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 Inver Grove Heights Police Department. Citizens can fill out the agency's Request for Police Data form if they would like to request ALPR data that they are entitled to by statute. Inver Grove Heights Police 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. The requests are made to the Inver Grove Heights Police Department and approved by the ALPR Administrator or his/her designee, as authorized by the Chief of Police. The requests are documented by agency name, requesting party, reason, and case number. As a result of these findings, Inver Grove Heights Police 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. Inver Grove Heights Police Department compiles monthly reports that contain the requirements of 13.824 Subd. 5. Sample reports of several months of use were reviewed during the audit process. These public logs of use are readily available through a proper records request through the Inver Grove Heights Police Department. Inver Grove Heights Police Department was found to be compliant with this part of the statute.

## **Notification to Bureau of Criminal Apprehension:**

Inver Grove Heights Police Department has made the required original notification to the Bureau of Criminal Apprehension. Upon the termination of their mobile ALPR program in May 2020, they provided the BCA with their notice and their listing was removed from the BCA website. Inver Grove Heights Police Department was found to be compliant with this part of the statute.

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## **Biennial Public Accountability Audit:**

Inver Grove Heights Police Department installed their ALPR system in 2015. They had their first ALPR Audit in September 2017 and another one in 2019, 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. Inver Grove Heights Police Department was found to be compliant with this part of the statute.

## **Breach Notification:**

The Inver Grove Heights Police 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. Inver Grove Heights Police Department was found to be compliant with this part of the statute

## **Conclusion:**

Based on the results of the Inver Grove Heights Police 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 Inver Grove Heights Police 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:

- Inver Grove Heights Police Department Chief of Police
- Minnesota Commissioner of Administration
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Chairs of Legislative Committees
- Minnesota Legislative Library