

Body Worn Camera (BWC) Compliance Audit

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Office of the City Auditor

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INTRODUCTION

- Gainesville Police Department's (GPD's) Property and Evidence Unit is responsible for BWC equipment and recordings.
- BWC System Administrator governs the BWC system, assigns and tracks equipment, controls passwords, and acts as liaison with BWC representatives.
- BWC Evidence Custodian is responsible for copying, logging, redacting, disseminating, and disposing of recorded media in accordance with Florida statutes.

INTRODUCTION (CONT.)

- The BWC Records Custodian is responsible for receiving and processing public records requests.
- All BWC recordings are uploaded and stored in the GPD agency portal of www.evidence.com.
- Between January 1 and July 31, 2021 GPD members uploaded 72,214 BWC recordings.

OBJECTIVE

The objective of the engagement was to assess:

- GPD's compliance with Florida's Body Camera statutes,
- GPD's compliance with internal BWC policies and procedures, and
- The effectiveness of the GPD BWC supervisory review program.

SCOPE AND METHODOLOGY

- The scope of the engagement included a review of compliance with policies, statutes, and internal controls around GPD's BWC administration, operations, and maintenance activities.
- This audit was included in the City Auditor's 2021 Audit Plan.

SCOPE AND METHODOLOGY (CONT.)

In performing the audit, we:

- Assessed the adequacy and completeness of policies and procedures, and compliance with Florida body camera statutes.
- Reviewed BWC Supervisor oversight processes and compliance activities related to the distribution of BWC recordings.
- Assessed the adequacy and completeness of BWC reporting and monitoring.

SCOPE AND METHODOLOGY (CONT.)

- Reviewed operation, storage, maintenance, and security of BWC and recordings.
- Reviewed adequacy of user access controls related to Axon Evidence (evidence.com).
- Reviewed key roles and responsibilities related to BWC administration and operations for adequate separation of duties.

BACKGROUND

- Body worn cameras (BWC) are recording devices issued to all GPD sworn officers and police service technicians.
- The primary purpose of the BWC is to enhance officer safety and the safety of the public, while promoting accountability and transparency.
- GPD began using the cameras in 2018. The equipment was upgraded in September 2020 and training of all sworn officers and service technicians began in October 2020.

BACKGROUND (CONT.)

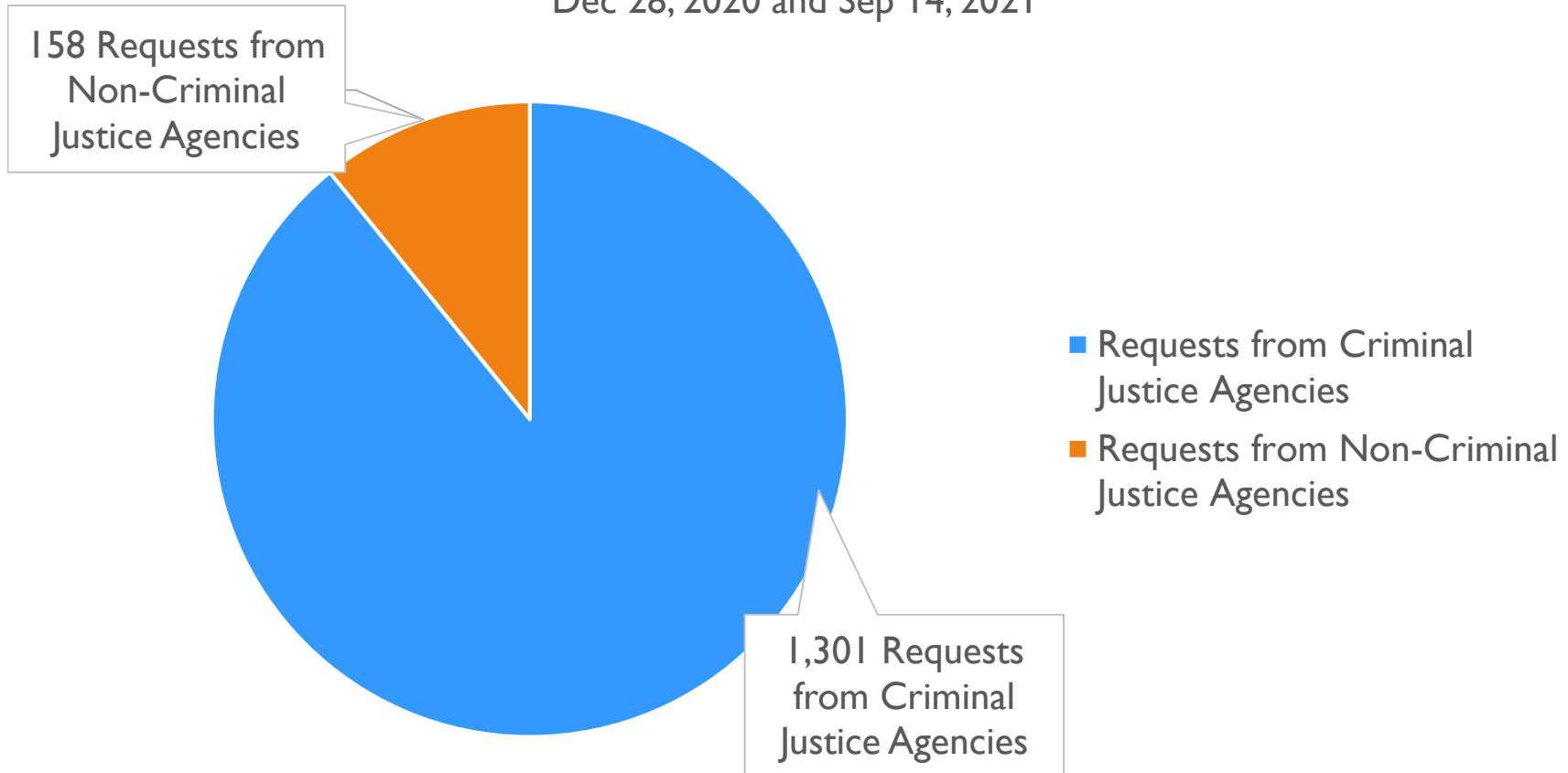
- Potential Impact: Study released by the University of Chicago Crime Lab states, “...the ratio of benefits to society from adoption of BWC to the costs is on the order of 5 to 1”.
- The Study also attributes the use of BWCs to an estimated 16.9% reduction in complaints against police and a 9.6% reduction in police use of force.
- Supervisor review of subordinate video for compliance with statutes and policy, is an important component of the GPD BWC oversight program.

BACKGROUND (CONT.)

- All video that includes response to resistance or a display of force, and two randomly selected videos per GPD member are selected for supervisor review every month.
- GPD Records Section coordinates requests for BWC video and forwards them to the BWC Evidence Custodian.
- Between December 2020 and September 2021, GPD processed 1,459 recording requests.

BWC Video Records Requests

1,459 Unique BWC Recording Requests between
Dec 28, 2020 and Sep 14, 2021





RESULTS AND CONCLUSIONS

GPD management has made significant progress in obtaining, implementing and monitoring usage of BWC. We identified three moderate risk opportunities for improvement:

- Issue #1 – Supervisor Review Not Monitored For Compliance.
- Issue #2 – Incomplete Documentation for Required BWC Training.
- Issue #3 – Insufficient Axon User Access Management Process.



ISSUE #1

Issue #1— Supervisor Review Not Monitored For Compliance

- Supervisory review Non-Operations Bureau member's BWC recordings were not being monitored for compliance with Florida Statute and GPD General Order 40.14.
- Audit has reviewed management's implementation plan for the new system and the proposed Supervisor Review process and determined the plan and proposed process would be adequate.

Management Action Plan:

- Management will continue moving forward with the established implementation plan and ensure review of recordings are conducted in accordance with Florida Statutes and GPD General Order.



ISSUE #2

Issue #2 – Incomplete Documentation for Required BWC Training

- Documentation was not available to evidence required training for two GPD members who had been issued BWCs and two supervisors who are assigned to review BWC recording.

Management Action Plan

- Management will ensure that training attendance is documented in the future. Additionally, management will verify completed training is appropriately documented through periodic quality control review of training documentation.



ISSUE #3

Issue #3 – Insufficient Axon User Access Management Process

- 13 of 1,248 Axon user access roles reviewed by audit had more access privileges than necessary to perform their duties and four of 300 active user accounts had not been properly deactivated.
- A Segregation of Duties best practice violation was identified. An Armorer user role had access privileges allowing them to reassign and delete their own BWC recordings.

Management Action Plan

- Management will coordinate with Enterprise IT Governance for best practices and perform standardized periodic user access reviews.