



CITY OF ATLANTA
City Auditor's Office
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December 2018

Performance Audit:

APD Body-Worn Cameras

What We Found

The Atlanta Police Department's officers risk the potential loss of evidentiary data and public trust by failing to consistently use body-worn cameras to record interactions with the public. Officers assigned body-worn cameras captured video for 33% of officer-dispatched calls from November 2017 to May 2018.

Officers also delayed activation and prematurely deactivated the body-worn cameras for many incidents. In our random sample of 150 videos, 61% were activated and 47% were deactivated according to policy. Overall, we estimated that 30%-46% of videos complied with both activation and deactivation procedures.

Officers uploaded 74% of videos according to the department's procedures within one day of the date they were recorded. Officers also categorized almost all videos but could improve accuracy of categories assigned. In our sample, officers miscategorized 22 videos, including one that the department agreed should have been categorized as a use of force incident. Miscategorized videos may be deleted prematurely, which may not comply with state law.

Supervisors are responsible for ensuring that officers comply with camera policies; however, supervisors reviewed only 2% of all videos uploaded between November 2016 and May 2018. Departmental procedures do not specify a formal process regarding the number of videos to review or include criteria to ensure compliance with recording policies.

Compliance staff are not reviewing videos as required to monitor compliance with camera policies and ensure video footage is not prematurely deleted. The team reviewed less than 1% of videos prior to deletion between November 2016 and May 2018. We also identified 64 videos that were deleted by users who should not have been authorized to delete videos from the system.

Why We Did This Audit

We undertook this audit because body-worn cameras enhance the transparency and accountability of interactions between citizens and the police. The chief of police requested we conduct a performance audit to assess compliance with the department's body-worn camera policy and recommend metrics for monitoring program compliance.

What We Recommended

To ensure compliance with the department's body-worn camera policies and best practices, we recommend that the chief of police:

- clarify the policy regarding recording all incidents
- update policy to remove requirement that supervisors upload use-of-force incidents and to require supervisors review audit trails to ensure involved officer has not accessed the video
- clarify criteria for categorizing videos in the policy
- establish a formal process for zone supervisors' reviews
- conduct monthly reviews of user roles and permissions
- enforce policies requiring the compliance team to review deleted footage prior to deletion
- develop standard justifications for access to videos

To ensure accountability and transparency, we recommend the chief of police monitor and track the following performance metrics :

- videos captured compared to dispatched calls
- videos uploaded within one day
- uncategorized videos
- videos streamed by supervisors
- videos deleted before the retention schedule
- videos audited by the compliance team
- audited videos that complied with activation procedures
- audited videos that complied with deactivation procedures
- audited videos that were accurately categorized

For more information regarding this report, please use the "contact" link on our website at www.atlaudit.org

Management Responses to Audit Recommendations

Summary of Management Responses

Recommendation #1:	To ensure compliance with the department's body-worn policies and best practices, we recommend that the chief of police clarify the policy to state whether all officers responding to an incident must record body camera video.	
Response & Proposed Action:	The existing SOP does not provide the level of clarity required for a large organization. The SOP will be modified to eliminate those factors causing confusion.	Agree
Timeframe:	December 2018	
Recommendation #2:	To ensure compliance with the department's body-worn policies and best practices, we recommend that the chief of police update the policy to remove the requirement that supervisors upload videos of use-of-force incidents and to require supervisors to review the audit trail to ensure the involved officer has not accessed the video prior to writing the report.	
Response & Proposed Action:	Due to a more complete audit trail, the policy will be revised to remove the requirement that supervisors upload videos of use-of-force incidents. The policy will now require the immediate supervisor to review the audit trail for compliance by the involved officer with the policy not to access the video prior to completing the initial incident report.	Agree
Timeframe:	December 2018	
Recommendation #3:	To ensure compliance with the department's body-worn policies and best practices, we recommend that the chief of police clarify criteria for labeling and categorizing videos in standard operating procedures.	
Response & Proposed Action:	The SOP has too many coding options, which has caused confusion and diminished performance. Initially there were 32 coding options, this has been reduced to 19, and the goal is 10 options. This reduction of choices should provide the necessary adjustments to allow for greater efficiency and consistency.	Agree
Timeframe:	December 2018	
Recommendation #4:	To ensure compliance with the department's body-worn policies and best practices, we recommend that the chief of police establish a formal process for zone supervisors' periodic reviews, including the number and selection of videos, frequency, and required documentation.	
Response & Proposed Action:	Each Zone is going to be required to have their administrative sergeant audit 25 recordings every 2-weeks. They will be required to document the specific recordings examined, whether they were properly labeled, whether the officer met stated recording requirements, and whether the Zone's UAF footage corresponds to the number of UAF incidents captured in the 911 Center. The Audit Team will be responsible for managing compliance with this requirement.	Agree
Timeframe:	January 2019	

Recommendation #5:	To ensure compliance with the department's body-worn policies and best practices, we recommend that the chief of police conduct monthly reviews of user roles and permissions to determine if non-administrator users can delete videos.	
Response & Proposed Action:	The department recognizes the need to regularly update access controls in the Evidence.com platform. There are personnel that depart, and others who change roles within our agency. Those that depart must be removed from Evidence.com access, and those who change roles need to have access appropriate to their assigned position. Tracking access also allows the BWC Team to track the status of BWCs no longer assigned and enables the team to put them back into circulation. The updating of access controls within Evidence.com will occur regularly, at least monthly.	Agree
Timeframe:	December 2019	
Recommendation #6:	To ensure compliance with the department's body-worn policies and best practices, we recommend that the chief of police enforce policies requiring the compliance team to review all deleted footage prior to deletion for miscategorization.	
Response & Proposed Action:	The retention period was modified, and all videos are saved for 5-years. Additionally, there are only 2 individuals with the authority to delete videos, and their accounts will be cross-checked by supervisory personnel. This policy amendment was made during the audit.	Partially Agree
Timeframe:	Complete	
Recommendation #7:	To ensure compliance with the department's body-worn policies and best practices, we recommend that the chief of police develop standard justifications for accessed footage to ensure compliance with the policy.	
Response & Proposed Action:	<p>The requirement to provide a specific reason for viewing a video is not an essential metric. The "notes box" is only available in Evidence.com after the video is uploaded, you are unable to add notes as to why you viewed a video in the Axon View App or in Axon Sync on the MDT, so it is not trackable across the range of viewing options.</p> <p>We are requiring that administrative sergeants and supervisors review BWC video to ensure the BWCs are activated and deactivated in accordance with policy, and not interrupted during recording. The supervisors will also audit to ensure the BWC is used according to policy. Only the officer assigned the BWC, his immediate supervisor(s), and the administrative sergeant can access the individual officer's BWC in Evidence.com. The requirement to label why a video is accessed only in Evidence.com, and not in the other viewing options makes this metric impossible to accurately track and enforce. The SOP will be amended accordingly.</p>	Agree
Timeframe:	January 2019	

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| Recommendations
#8–16: | To ensure accountability and transparency, we recommend the chief of police monitor and track the following performance metrics for the number and percentage of:
8. videos captured compared to the number of dispatched calls, using the 80% threshold as a comparative benchmark
9. videos uploaded to the system within one day
10. uncategorized videos
11. videos streamed by supervisors
12. videos deleted before the retention schedule
13. videos audited by the compliance team
14. audited videos that complied with activation procedures
15. audited videos that complied with deactivation procedures
16. audited videos categorized accurately |
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Response & Proposed Action:	Metrics must be developed that allow for improved performance. The Zone audits will encompass much of the above-referenced, while a final audit checklist is still being identified.	Agree
Timeframe:	January 2019	
