CITY AUDITOR'S OFFICE

CITY OF ATLANTA

PERFORMANCE AUDIT:

Atlanta Police Department Body-Worn Cameras Follow-Up

August 7, 2025
Project No. 25.01

www.atlaudit.org

CITY OF ATLANTA

AMANDA NOBLE
City Auditor
anoble@atlantaga.gov

STEPHANIE JACKSON
Deputy City Auditor
sjackson@atlantaga.gov

CITY AUDITOR'S OFFICE
68 MITCHELL STREET SW, SUITE 12100
ATLANTA, GEORGIA 30303-0312
http://www.atlaudit.org
(404) 330-6452
FAX: (404) 658-6077

August 7, 2025

Honorable Mayor and Members of the City Council:

We conducted this audit as a follow-up to our 2018 performance audit of body-worn cameras, which made 16 recommendations intended to align policies with best practices, improve compliance with policies, and better monitor compliance. We reviewed the extent to which the prior recommendations were implemented, the underlying risks were mitigated, and whether the actions taken improved compliance. We found significant improvement in the body-worn camera program since the initial audit, specifically with activation, deactivation, and video capture. Our current recommendations address remaining risks, including clarifying guidance to improve video capture, strengthening video categorization, and improving supervisory oversight.

The Audit Committee has reviewed this report and is releasing it in accordance with Article 2, Chapter 6 of the City Charter. We sent a draft report to management on July 9, 2025, and received their response on July 28, 2025. We appreciate the courtesy and cooperation of Atlanta Police Department staff throughout the audit. The team for this project was Linden Kuhn and Duane Braithwaite.

Amanda Noble
City Auditor

Donald T. Penovi, CPA
Chair, Audit Committee

Table of Contents

Audit Objectives

Body-worn cameras enhance transparency and accountability for interactions between citizens and the police. Our 2018 performance audit of the program made 16 recommendations intended to align policies with best practices, improve compliance with policies, and better monitor compliance. This follow-up audit assesses the extent to which those recommendations were implemented and whether the actions taken improved compliance.

This report addresses the following objective:

1. Has compliance with the body-worn camera program's policies and procedures improved since 2018, and has the department implemented our prior audit recommendations?

Executive Summary

What We Found

Previous findings: In our 2018 Atlanta Police Department Body-Worn Cameras audit, we found that in the department's initial rollout of the cameras, officers weren't consistently turning the cameras on, and were delaying activation and prematurely deactivating the cameras. Only a third of dispatched calls were recorded, and some videos were deleted before the minimum 180-day retention period ended, either manually or because officers miscategorized the incident types. Supervisors were not regularly reviewing uploaded videos to confirm whether officers were properly using the cameras, and specific procedures for camera activation and deactivation were unclear.

Current findings: Since the last audit, we found significant improvement in the program, although some risks remain. Currently, cameras have been assigned to all units, and officers have recorded and uploaded videos for 88% of dispatched calls. The new camera technology has helped improve video capture by automatically activating cameras when officers unholster firearms or turn on the squad car's emergency lights and sirens. The lights and sirens also automatically activate cameras of all officers on the scene within a 30-foot radius. The department also disciplines officers who don't comply with camera procedures, and now retains videos for at least 5 years. Despite these improvements, we still identified instances where officers turned on cameras late and turned them off too soon, which could either be a mistake or an intentional effort to hide wrongdoing. Capturing complete videos of interactions with citizens helps provide police transparency and accountability and also helps build public trust. Procedures now require supervisors to review who accessed use of force videos to ensure the involved officer didn’t view footage before writing an incident report; however, overall access to videos needs to be more limited. Supervisory review of footage to ensure compliance can also be improved.

What We Recommended

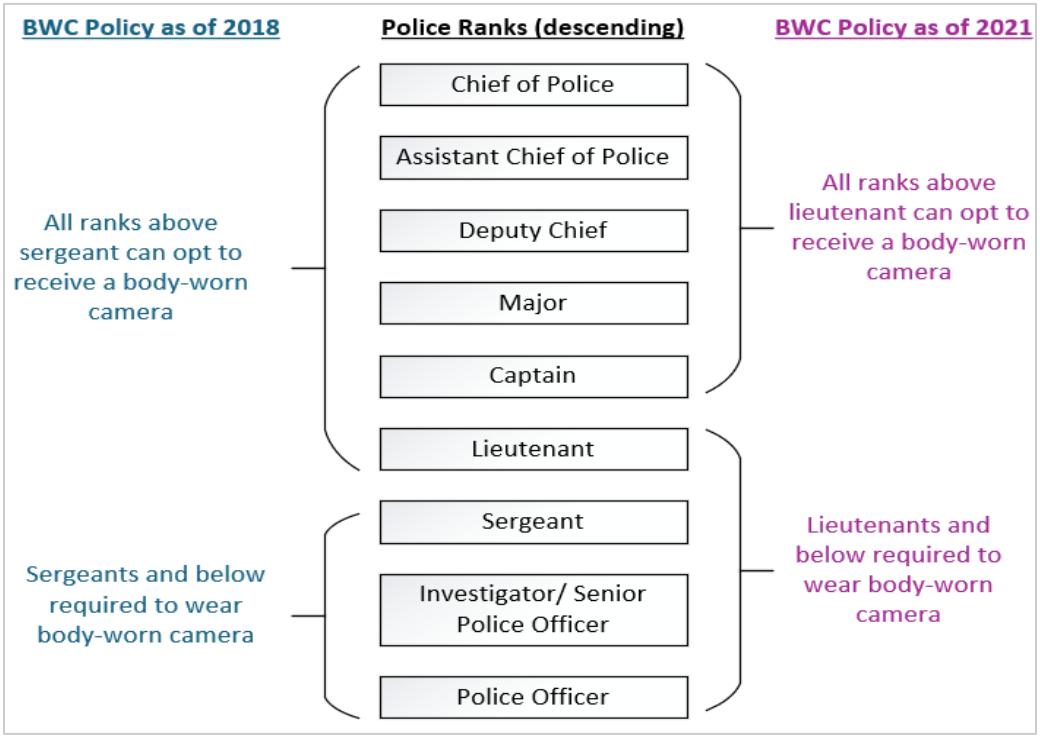
In this audit, we made five recommendations geared toward improving the completeness and tracking of supervisory review and using system tools to track compliance with camera activation and deactivation procedures. These should help to further improve camera compliance, protecting both officers and the public.

Background

Body-worn cameras are small devices that capture video footage of police officers' interactions with the public, promoting accountability and transparency. City Council authorized resolution 16-R-4096 in August 2016 for the Atlanta Police Department to procure body-worn cameras, and the department began issuing them to officers later that year. In 2018, the department provided the cameras to staff ranked sergeant and below in all six police zones and a few special police programs, with approximately 800 cameras assigned.

The department now requires staff ranked as lieutenants and below in all of its special programs and tactical units to use body-worn cameras. Staff who aren't required can elect to get a camera. As of March 2025, 1,826 department employees, both sworn and non-sworn, were assigned a body-worn camera. Police appear to have assigned cameras to all required, and some non-required, staff.

Exhibit 1: 1,826 Police Employees Wear Body-Worn Cameras



Source: Sworn APD Rank Structure from p. 2 of Police standard operating procedure 1010, "Mission and Organization," last updated December 28, 2020.

The city's camera provider is Axon; the city has a 10-year, $97.4 million contract with the vendor (through special procurement) that provides Police, Fire, and Corrections with a variety of cameras and other devices and related professional services. Evidence.com, Axon's cloud software, houses all body-worn camera videos, as well as some other evidence.

The Police department has a Body-Worn Camera Compliance Unit to manage Evidence.com, cameras, supervisory reviews, and other related items. This unit reports to the Office of Professional Standards, which handles internal affairs. The unit is split into two groups: logistics and compliance. The logistics team has four members who manage Evidence.com, inventory, and troubleshooting. The compliance team has two staff members who focus on monitoring supervisory review processes, conducting weekly video reviews, identifying uncategorized videos, and initiating camera-related disciplinary procedures.

Body-Worn Camera Features Have Improved

Axon has updated its camera technology and accessories since 2018. The current model used by Police is called the Axon Body 4. This camera has improved camera capture and increased battery life. It has a display screen that shows the battery indicator and a light that indicates when the camera is ready to record. The new camera also has livestreaming capability and two-way communications for real-time assistance. Exhibit 2 shows the differences between the previous model and the new camera features.

Axon also created two new accessories that auto-activate nearby body-worn and other cameras. If an officer unholsters a firearm, the signal sidearm holster sensor automatically activates recording on all cameras within a 30-foot radius. The fleet system turns recording on all cameras in the same radius if someone turns on the police vehicle's lights and sirens. The current camera model also uses another accessory, the flex point-of-view add-on camera, that connects to the body-worn camera and captures video and audio from additional angles. The Body 4 model includes a video recall feature, which can help recover some video from the previous 18 hours if an officer did not record an incident. Police also use several other Axon devices that are not covered in this audit, such as dashboard, interview, and drone cameras.

Exhibit 2: Axon's New Camera Offers More Features Than The 2018 Model

Source: Atlanta Police Department Body-Worn Cameras performance audit, p.3

Source: Created by auditors based on Axon Body 4 Quick Start Guide and Axon.com press photos

Officers are responsible for capturing, uploading, and categorizing video footage, as well as for maintaining videos for record retention purposes:

- **Capturing video**: Sworn employees who are in the field daily are required to power on cameras when their shifts start and leave them on until the end of shift. To record video of an incident, officers must double-tap the camera's event (recording) button unless the recording is auto-activated by someone in the vicinity unholstering a firearm or turning on emergency lights and sirens. Once an officer begins recording, the camera saves video (without audio) from the two minutes immediately prior. To end a recording, officers press and hold the recording button for three seconds. When the recording ends, the camera stays on and ready for the next recording.

- **Uploading footage**: Employees who are in the field are required to dock their cameras at the police precinct at the end of each shift, which charges the camera, downloads any updates, and uploads videos to Evidence.com, Axon's cloud storage system for videos and other police evidence. Staff who are not regularly assigned to the field must dock their cameras at least once a month.

- **Categorizing and retaining videos**: Once videos are in Evidence.com, officers must tag the video with one or more categories, such as "arrest" or "traffic enforcement." The categories determine how long the system retains the video and whether access to the video is restricted.

- **Supervisory compliance reviews**: Axon added a feature to Evidence.com in May 2024 that allows supervisors to create, input, and submit compliance reviews within the system to review whether employees are complying with body-worn camera procedures. Police also use an audit feature within the system that randomly samples subordinates' videos for supervisory review within a selected date range.

In 2024, Police Uploaded Over 750,000 Body-Worn Camera Videos Through October

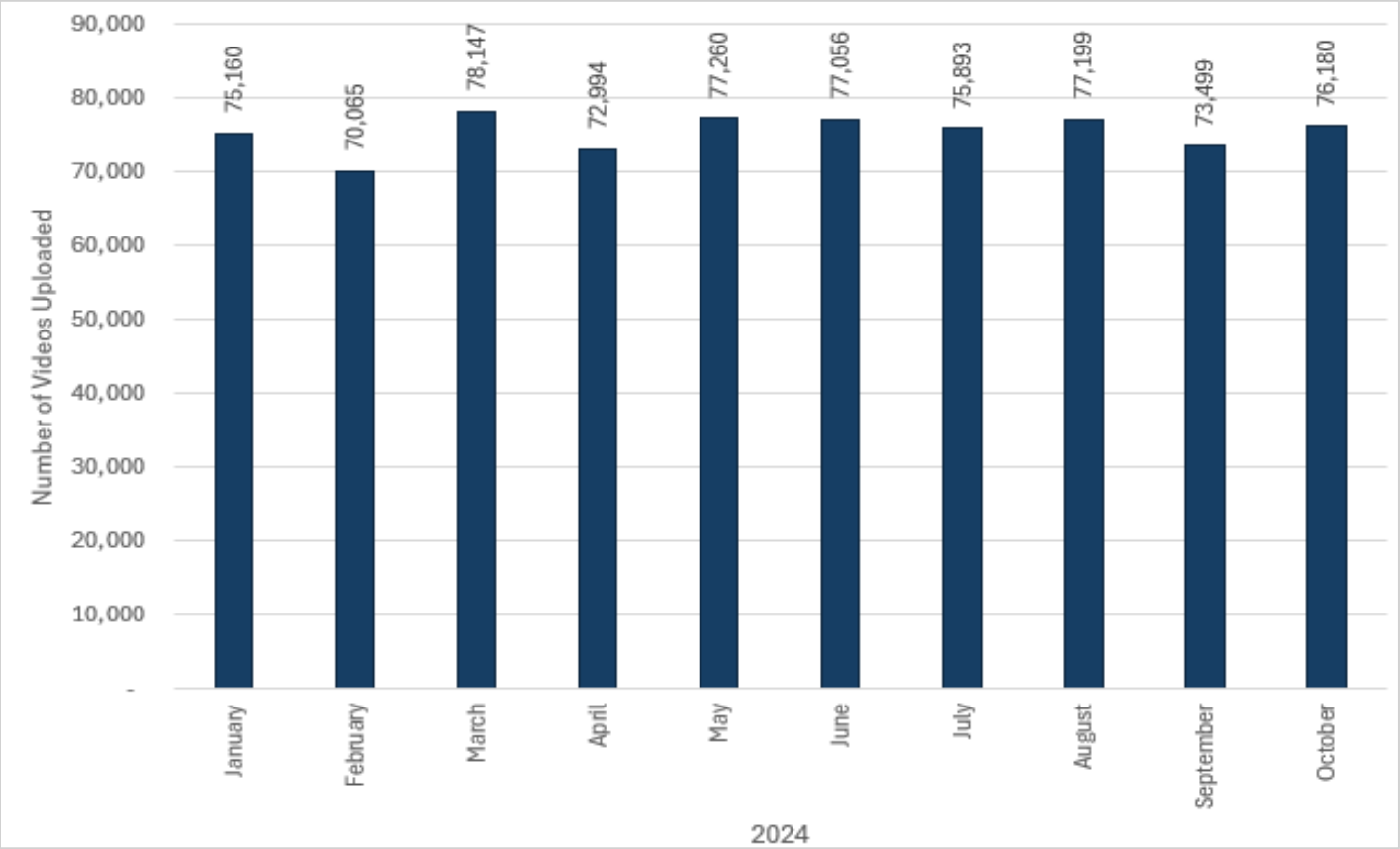
Body-worn camera users recorded and uploaded 753,453 videos from January 1, 2024 to October 31, 2024, creating between 70,000 and 78,000 recordings per month (see Exhibit 3). Officers categorized the videos by incident type, and in some cases using multiple categories.

The number of videos for the top five categories were:

1. Investigations (472,473)
2. Traffic enforcement (137,423)
3. Incident report (127,972)
4. General citizen contact (92,190)
5. Accidental–training (61,669)

Videos categorized as investigations made up the largest percentage of videos, at 63% of the total, followed by traffic enforcement at 18%, and incident reports at 17% of the total uploaded videos. Footage related to use of force incidents accounted for less than one percent of all videos.

Exhibit 3: Officers Created and Uploaded 753,453 Videos During January-October 2024



Source: Body-worn camera videos uploaded into Evidence.com, January 1, 2024, to October 31, 2024

The approximately 750,000 videos uploaded in this 10-month period illustrates the broader use of the cameras since 2018, when officers uploaded just under 500,000 videos in 18 months.

Supervisors Are Required to Assess Employees for Compliance with Camera Policy

Since 2018, Police have established two supervisory review processes to review and assess compliance with the camera program. Axon added a new feature in May 2024 which allows Police to digitize forms for both supervisory reviews in Evidence.com.

- **Weekly review**: Unit commanders fill out a form assessing five employees, selected randomly, for compliance over that week. The commanders review and document metrics such as whether an officer has any assigned calls missing video or uncategorized videos, the last date that the officer docked the camera, and whether the officer complied with the camera policy.

- **Biweekly review:** Department policy requires each section to complete a form once every two weeks reviewing ten random videos from subordinates. Supervisors use the randomized video audit feature in Evidence.com to select videos to be reviewed in order to asses whether officers began and ended recordings as required by policy.

Findings and Analyses

Objective 1: Has compliance with the body-worn camera program's policies and procedures improved since 2018, and has the department implemented prior audit recommendations?

In December 2018, our office released a performance audit of the program that assessed compliance with department policy and recommended metrics to monitor compliance. That audit reviewed activity from November 2016 to June 2018 and made 16 recommendations focused on improving policies, establishing review processes, and monitoring compliance. Police have implemented almost all recommendations as suggested or mitigated the risk that the recommendations were intended to address. Each of the prior recommendations and current implementation status are listed in Appendix C.

The Atlanta Police Department has made significant progress with its body-worn camera program since 2018, specifically in the areas of oversight and supervision, compliance with policies and procedures, and video record retention. However, areas in which the department could still improve include clarifying procedures and enforcing procedures more stringently.

Most Dispatched Calls Had Body-Worn Camera Video

On-duty officers receive calls for service from dispatchers in the E911 communications center and also initiate services based on citizen needs. Of the 740,194 dispatched and self-initiated calls from January through December 2024, that should have had corresponding video, Police captured body-worn camera video for 649,212 (88%) of calls. In 2018, we found that officers failed to capture most dispatched calls. Capturing video for calls strengthens investigations, improves police accountability, and increases public trust.

E911 dispatchers receive calls from the public and then assign these to on-duty officers. Officers can also call into E911 for self-initiated calls, such as when an

officer issues a speeding ticket. We reviewed E911 dispatch records from the CAD (computer-aided dispatch) system and searched for videos on Evidence.com tagged with the same incident number. In the prior audit staff told us, about 80% of the E911 calls should have corresponding video footage—dispatched calls without matching videos may be calls that did not require police action, such as providing someone with directions. Since the previous audit, Police specified the dispatch call types that do not require video; these are primarily for officers driving by properties and attending events in an official, non-enforcement capacity. Dispatch also has a category for "extra jobs" so that Police know where officers are when working an outside job. We excluded dispatched calls that did not require police action, those for "extra jobs" only, and any dispatch calls that were not assigned to an officer. For 2024, there were 107,925 assignments for call types that do not require video, and 23,698 dispatch calls not assigned to an officer.

In our 2018 audit, we recommended that Police monitor and track the number and percentage of videos captured compared to the number of dispatched calls. As of 2024, the department partially monitors this metric through its weekly review process.

Officers Improved Camera Activation and Deactivation Since 2018

Since 2018, officers have significantly improved body-worn camera use. We reviewed a sample of 70 videos—a random sample of 20 videos created by zone officers from January to October 2024 and a judgmental sample of 50 videos from biweekly supervisor review forms completed between October 28 and December 29, 2024. The latter sample includes videos by both zone officers and other Police officers, such as tactical unit officers and investigators. We found that officers properly activated, or began recording video before arriving on scene, in 55 (79%) of videos. Officers properly deactivated, or ended the video after leaving the scene, in 57 (81%) of the 70 videos (see Exhibit 4).

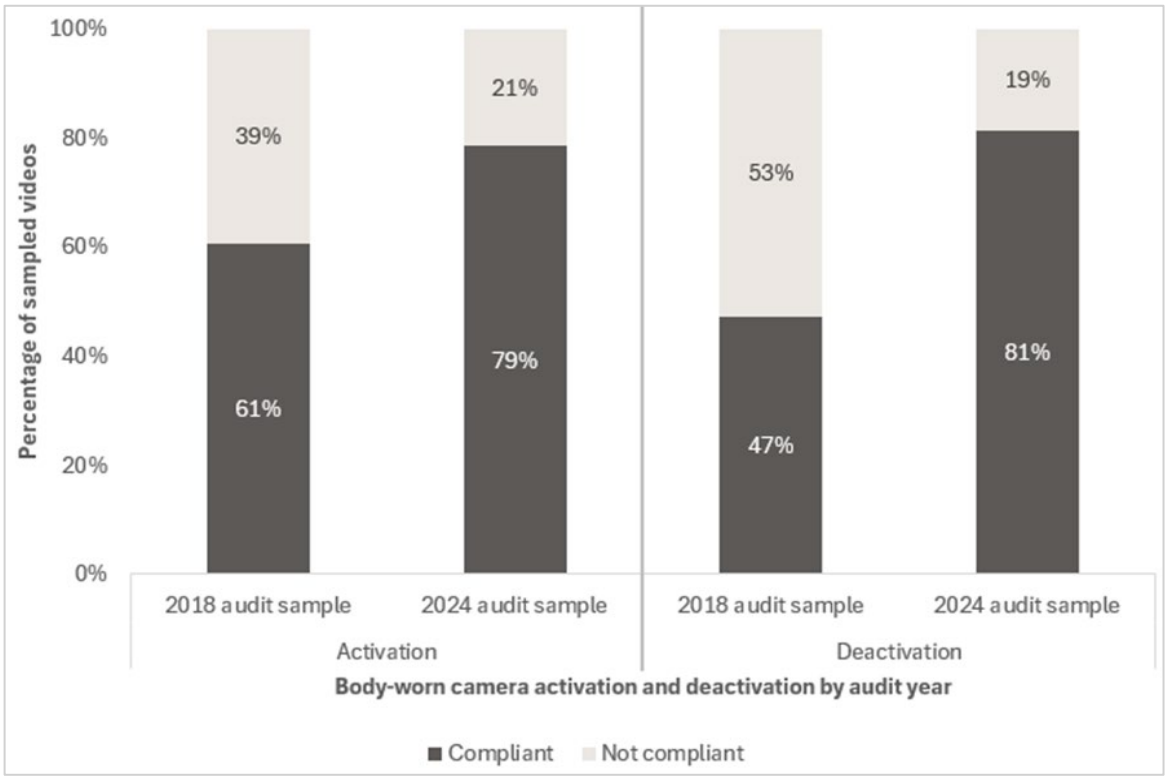
Officers Properly Activated and Deactivated Cameras in 79% of Sampled Videos

This represents an improvement from 2018, when we found that in a sample of 150 videos, officers activated their cameras according to policy in 61% of the videos and deactivated properly in 47% of videos. To capture the whole event,

officers need to begin recording (activate camera) once they arrive on scene and wait until they leave the scene to end the recording (deactivate camera).

In our 2018 audit, we recommended that Police monitor and track the number and percentage of supervisor-reviewed videos that complied with activation and deactivation procedures. The improvement in compliance with camera procedures can likely be attributed to a new supervisory review process. The department now requires zone supervisors to review 10 videos biweekly of their subordinates, which includes checking whether the officer activated and deactivated the camera according to procedures. Exhibit 4 shows performance in 2024 compared to 2018.

Exhibit 4: Camera Activation and Deactivation Improved Since 2018

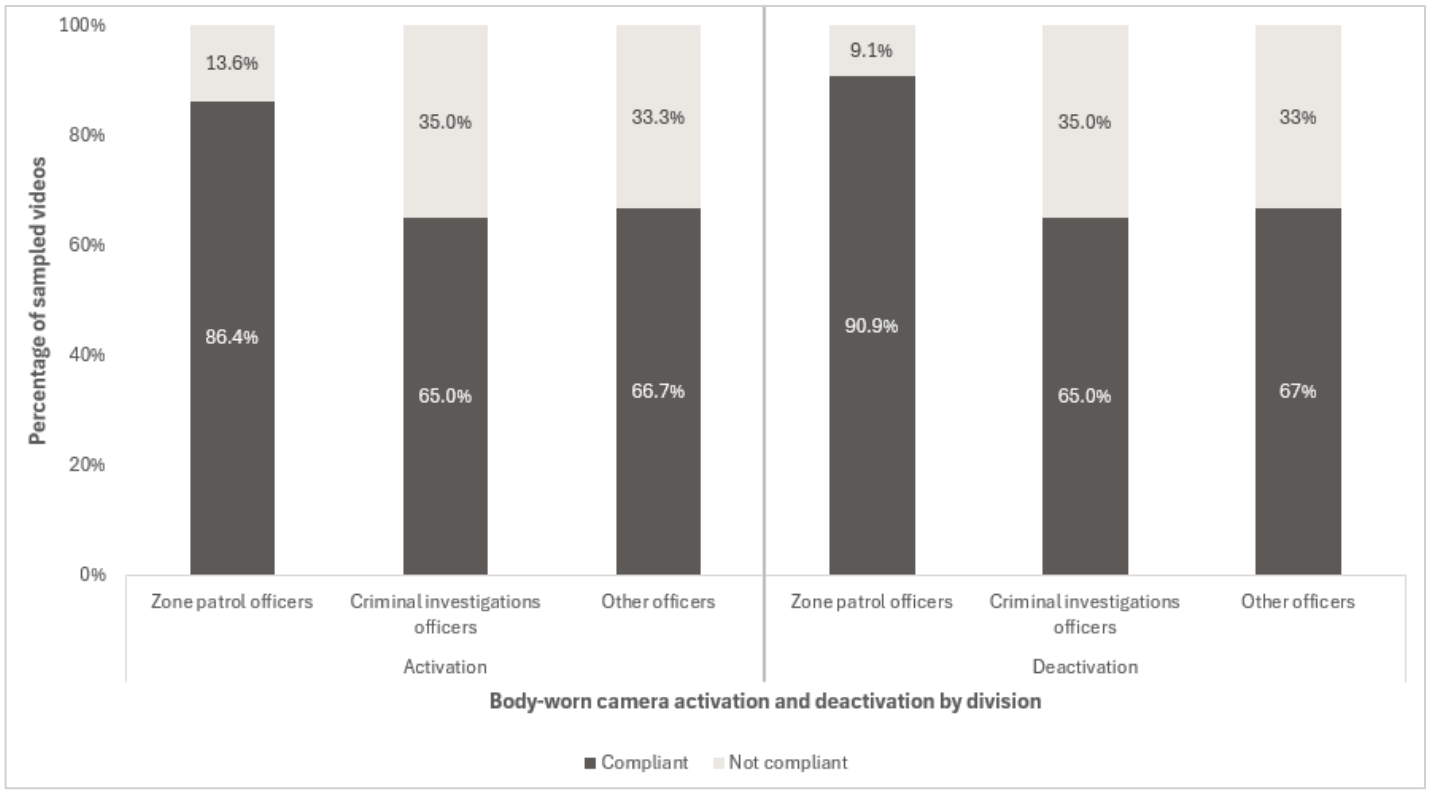


Sources: 2018 data: 2018 APD Body-Worn Cameras Audit, p. 13; 2024 data: auditor analysis of 70 sampled videos, 20 of which were randomly sampled from Evidence.com videos created by zone officers in 2024, and 50 of which were sampled from biweekly supervisor forms between October 28, 2024 and December 29, 2024.

Activation and deactivation compliance was highest for zone officers, with 86% activation and 91% deactivation compliance for our sampled videos. Exhibit 5 compares activation and deactivation compliance from our sample by division. Zone patrol officers are dispatched for E911 calls, while criminal investigations and other officers are more likely to conduct interviews, arrests, or other follow-

up calls after the initial dispatch. The Criminal Investigations division includes fugitive, gang, robbery, and related units. The other offices included in our sample are the airport, license and permits, and motors units.

Exhibit 5: Zone Patrol Officers Properly Activated and Deactivated More Than Any Other Division Officers in Sampled 2024 Videos



Sources: auditor analysis of 70 sampled videos, 20 of which were randomly sampled from Evidence.com videos created by zone officers in 2024, and 50 of which were sampled from biweekly supervisor forms between October 28, 2024 and December 29, 2024.

Video coverage by all officers on scene also improved. In 2024, we found that 42 of 45 sampled videos (93%) that were for dispatch calls had video from all assigned officers, compared to 60% in 2018. We used dispatch data for our 2024 sample to compare footage from Evidence.com to the number of officers dispatched. Having video from each officer on scene ensures a complete and accurate picture of an incident and reduces the risk of a biased representation of events.

93% of Relevant Sampled Videos Had Footage From Each Assigned Officer

In our prior audit, we recommended that Police clarify its camera policy to state whether all officers responding to an incident must record video. The current policy doesn't explicitly require all officers on scene to capture video footage. Although Police did not change its policy as recommended, a number of changes may be contributing to the increase. If an officer unholsters a firearm, the signal sidearm holster sensor automatically activates recording on all cameras within a 30-foot radius. Also, the fleet system turns recording on all cameras in the same radius if someone turns on a police vehicle's lights and sirens. Along with the technology improvements, the department's new supervisory review processess may also be contributing to the increase in video footage among all officers responding to a call.

Clarifying Policy Could Further Improve Compliance

In 2021, Police updated its activation and deactivation policy. The current policy states that the body-worn camera is to be activated at the time the call is dispatched to an officer and the camera is to be deactivated after the officer contacts dispatch to conclude the incident. Police staff told us that despite the policy change, **if** officers activate their camera when arriving on scene and deactivate upon leaving, supervisors consider this to be compliant. This was the previous policy during our 2018 audit.

We used the more common supervisor criteria of activating before arriving on scene and deactivating upon leaving the scene for our test, rather than using the policy, partly because not all of the calls we reviewed were for dispatched calls. For the 50 of 70 sampled videos that came from supervisory review forms, we agreed with the supervisor's determination of activating before arriving on scene 66% of the time (33 of 50 videos) and of deactivating after leaving the scene 72% (36 of 50 videos) of the time. Having clear, agreed-upon criteria for assessing proper activation and deactivation improves video capture. Police staff told us the department is currently revising the camera policy and deciding which criteria to use for proper activation and deactivation.

The revised policy is unclear about when to start recording or ending video for cases other than the initial dispatch call, such as follow-up interviews or arrests. Half of the 50 sampled videos from the supervisory review forms were recordings after the initial dispatch call. Policy also specifies that it only covers sworn employees—there is no policy on camera usage for non-sworn employees, even though some are assigned cameras. Of the 50 sampled supervisory review videos, two were taken by non-sworn staff.

We found that officers appeared to not turn their cameras on at the beginning of their shift in 11 of the 70 (16%) total sampled videos. Some of these staff are not in the field daily but policy does not clearly address when non-field staff must turn on their cameras.

We recommend that the chief of police clarify proper activation and deactivation procedures and ensure supervisors enforce the procedures consistently. We also recommend that the police chief create guidance for camera activation and deactivation related to non-dispatched calls and non-sworn employees, as well as clarify when non-field staff must turn on cameras.

New Features Reduce Risk of Upload Delays

The department's procedures require users to upload video footage by the end of the shift. In 2018, we found that 74% of body-worn camera videos were uploaded to the system within one day of creation. Not uploading videos in a timely manner increases the potential risks that officers will not correctly categorize and label videos, that the camera could delete the video due to it being full, and that evidence is not available in a timely manner for investigations. In 2018, we recommended that Police monitor and track the number and percentage of videos uploaded to the system within one day.

As of 2024, Police did not track videos uploaded to the system within a day; however, camera upgrades and new features help reduce the potential risks of upload delays. Since the previous audit, Police purchased Axon's fleet system of in-vehicle cameras. The most recent fleet model automatically and simultaneously uploads body-worn camera videos to Evidence.com when the engine is turned on. Officers can now categorize videos on their cameras within 30 seconds of the video ending. Axon also increased the camera's storage space. Police also began tracking the last date officers docked their cameras using the weekly metrics supervisory review form.

Video Retention Period Extended to Five Years

Police significantly improved body-worn camera video retention and oversight since 2018 by extending the minimum video retention period from 180 days to five years. After uploading camera footage to Evidence.com, officers must manually add a category tag for the video, such as "arrest" or "use of force" to explain the incident type. This can be done using the website, mobile app, or on the body-worn camera's screen. Categories determine how long Police retain the video and whether there are any restrictions to access the footage.

Longer Retention Period Reduces Risk of Premature Deletion

In 2018, video retention varied from 180 days to indefinite, in accordance with the state's Open Records Act. Videos retained indefinitely include homicide/sex crimes, serious injuries/fatalities from traffic accidents, and evidence gathered by Crime Scene Unit personnel. In our 2018 audit we found that most videos were categorized, but some were miscategorized or missing case numbers. We recommended then that Police have the compliance unit review footage scheduled to be deleted for miscategorization, as well as clarify criteria for labeling and categorizing videos in standard operating procedures.

Police revised their procedures during the 2018 audit to change the minimum video retention period to a minimum of five years, which significantly reduces the risks associated with miscategorization. Although department policy doesn't require the Compliance Unit to review videos before deletion as recommended, the longer retention period reduces the risk of premature deletion if videos are miscategorized. Also, the supervisory review of videos may help to monitor uncategorized and miscategorized footage. By 2024, the Compliance Unit started running reports of uncategorized videos every other week. During the weekly supervisor reviews, supervisors recorded the number of categorized videos for the reviewed officers, and the biweekly video form had a column to mark whether the video was correctly categorized.

Video Categories Have Been Reduced, But Gaps Remain

The department reduced the number of video categories from 32 to 15 to increase efficiency and consistency and clarified some labeling guidance. From our sample of 70 videos, we identified 18 videos (26%) that had been miscategorized. If categorized differently, 2 of those 18 would be subject to a longer retention period and have additional access restrictions; both were categorized as "Incident Report" but should have been categorized as "Homicide-Sex Crimes" (see Exhibit 6). **We recommend that Police provide guidance on when to use categories that have longer retention periods.**

Exhibit 6: Policy Clearly Defines Some Categories but Not Others

CATEGORY	RETENTION	ADDITIONAL INFORMATION
Accidental - Training	5 Years	All accidental / training videos must have an APD case number associated with them.
Arrest	5 Years	All instances where the call for service or incident led to a physical arrest.
sUAS Video	5 Years	To ONLY be used by personnel authorized to operate unmanned aerial vehicles for the department; NOT meant to notate usage or incidents involving privately owned drones, i.e. report of unsafe drone operation by private citizens, noise or trespass complaints about privately owned drones, theft of privately owned drones, etc.
General Citizen Contact	5 Years	To include citizen encounters while not out on dispatched or self-initiated calls for service and not acting in a law enforcement capacity, i.e. flag downs for directions, citizens wanting to take pictures with an officer, etc.
Homicide-Sex Crimes	Indefinite	Accessible to authorized user roles only (admins, Command Staff, Homicide / SVU, OPS, Accident Investigations, Crime Scene Unit).
ID Technician	Indefinite	To be used ONLY by Crime Scene Unit personnel to categorize any photo or video evidence generated and uploaded by them; NOT to be used to categorize videos or photos by officers and investigators to notate that Crime Scene techs were called out to the scene. Accessible to authorized user roles only (admins, Command Staff, Homicide / SVU, OPS, Accident Investigations, Crime Scene Unit).
Incident Report	5 Years	To include incident and accident reports.
Investigations	5 Years	To include all dispatched and self-initiated calls for service, and also citizen encounters while acting in law enforcement capacity.
Pending Review	Indefinite	Not to be used.
Restricted	Indefinite	Accessible to authorized user roles only (admins, Command Staff, Homicide / SVU, Accident Investigations, OPS, Crime Scene Unit).
Serious Injury / Fatality Motor Vehicle Collision	Indefinite	To be used in all instances of serious injury or fatality stemming from traffic accidents. To be used by Accident Investigations Unit ONLY. Accessible to authorized user roles only (admins, Command Staff, Homicide / SVU, Accident Investigations, OPS, Crime Scene Unit).
Supervisor Request	5 Years	To be tagged with APD case number of original incident or to be tagged with its own case number if no originally dispatched incident exists.
CEW Firing Log - Test	5 Years	To be used only by Taser administrators when uploading these types of data files.
Traffic Enforcement	5 Years	To include traffic accidents, traffic stops, illegal parking, and vehicle safety checkpoints.
Use of Force	5 Years	To include all incidents of physical use of force, use of force with baton, OC or Taser, stop sticks or PIT maneuver, and forcible entry into dwelling, structure or vehicle.

Source: APD.SOP.3133 - Body Worn Cameras, p.11-12, last updated 3/24/2021

In our 2018 audit, we found that 60 videos were deleted before the scheduled date by non-administrator users, which posed potential risks of evidence tampering, inappropriate behavior, and liability. We also found that 80% of videos streamed were missing a note explaining why the user had accessed the video despite policy requiring a justification. In that audit, we recommended that Police conduct monthly user role and permissions reviews, track videos deleted before the retention schedule, and develop standard justifications for access to videos.

The department does not regularly review user permissions and its policy does not require staff to track videos deleted before scheduled, but it did adjust role permissions so that only administrators can delete videos. The compliance unit also established a process to update individual roles and permissions whenever Police issue a role change using a personnel order. Additionally, Police made some categories restricted, which further reduces the risk of inappropriately streaming videos.

Handling of Use of Force Videos Has Improved

Police policy defines use of force as "all incidents of physical use of force" or of "forcible entry into [a] dwelling, structure or vehicle." The policy adds that physical use of force can include using force with a baton or TASER. In 2018, departmental policy required supervisors to upload use of force incidents to ensure that officers involved don't view the video before writing up a report. Sworn employees who view their use of force footage before writing up their account of the incident could change their story.

Our previous audit found that while policy at the time required supervisors to upload any use of force videos, Evidence.com could not always distinguish which user was uploading video. When the system could identify whether a user was a supervisor, we found that only 27% of use of force videos were uploaded by supervisors. We also identified a control gap in Axon's software that allowed employees to watch a video on the mobile app without it being recorded in any audit trail. We recommended that Police update its policy. We also recommended that Police remove the requirement for supervisors to upload use of -force videos and instead require supervisors to review the involved officers' audit trails to ensure the involved officer has not accessed the video prior to writing the report.

Officers Can No Longer View Lethal Use of Force Videos

Axon has since configured the mobile app so that videos watched in the Axon app are part of the audit trail. Police updated its policy in line with the previous audit's recommendations to require supervisors to review the audit trail to ensure involved officers wrote the report before viewing the video. Employees are also now prohibited from watching any lethal use of force videos. The new policy specifies that supervisors are responsible for ensuring the use-of-force footage is uploaded rather than having to upload the footage directly.

System Tools Can Improve Effectiveness of Supervisory Reviews

Supervisors are charged with ensuring their subordinate officers comply with the department's body-worn camera policy, and the Compliance Unit provides the necessary oversight. Officer’s failure to comply could result in disciplinary action. In our 2018 audit we found that supervisors and Compliance Unit staff streamed only two percent and one percent of total videos, respectively. The

department lacked formal processes for supervisor and compliance reviews. We recommended then that Police establish a formal process for zone supervisors' periodic reviews, including the number and selection of videos, frequency, and required documentation.

Since 2018, Police created regular video review processes, including weekly and biweekly audits by supervisors to review and document officer compliance with body-worn camera policy. The department established two supervisory review processes: a weekly metrics form filled out by unit commanders and a bi-weekly video form completed by each section. The weekly metrics form documents whether officers have any dispatched calls missing camera footage, any uncategorized videos, or are not compliant with any part of the department's camera policy, as shown in Exhibit 7. We found about 70% of the required supervisory review forms were submitted in the periods we reviewed in 2024, with many incomplete or missing key checks.

Exhibit 7: Weekly Metrics Assess Whether Selected Officers Had Video for All Relevant Dispatch Calls

ATLANTA POLICE DEPARTMENT

Weekly Activation Audit of BWC Recording Data Supervisory Report

**** Report Due Monday at 0900 hours ****

Zone: [redacted]	Watch: [redacted]

Date Range of Audit	10/27/2024 to 11/02/2024
Cobra Week	44

(Date Range of Audit must coincide with COBRA Week #)

Sworn Employee Name (last, first)	Unique ID	Review Date	Number of Calls for Service	Number of Signal 89, 91, Code 4 Calls	Number of BWC Recordings	Number of BWC Recordings with Incident Numbers	Number of BWC Recordings with Proper Category	Last Date BWC was docked	In Compliance with APD.SOP.3133 Body Worn Cameras (Y/N)
[redacted]		10/27/2024	11	2	9	9	9	11/02/2024	Yes
		11/01/2024	19	8	11	11	11	11/03/2024	Yes
		10/30/2024	7	0	7	7	7	11/03/2024	Yes
		10/29/2024	12	2	10	10	10	11/03/2024	Yes
		10/28/2024	13	2	11	11	11	11/02/2024	Yes

Instructions: Weekly Audit of BWC's. Unit Commanders will need to audit five (5) sworn employees (officer/sergeant) each week. To conduct audit, the unit commander shall:

1. List the employees last and first name;
2. List the employees unique ID;
3. List the review date;
4. List the number of calls for service (from CAD);
5. List the combined number of signal 89, 91, and code 4 calls;
6. List the number of BWC recordings (from
7. List the number of BWC recordings with the correct incident number listed;
8. List the number of BWC recordings that were categorized properly;
10. List the date that the BWC was last docked;
11. Write yes or no to indicate if the employee is in compliance with APD.SOP.3133 Body Worn Camera policy.

Formula: Take the total number of calls for service minus the total combined number of 89, 91, and Code 4 calls. Subtract the number of 89, 91, and Code 4 from the total number of Calls for Service. This total should equal the number of BWC recordings.

Supervisor and Command sign-off:

[redacted]

Supervisor Auditor Sign-off (Title, Name, Unique ID)

Unit Commander Sign-off (Title, Name, Unique ID)

Source: Screenshot of sample weekly metrics form taken by auditors with identifying information redacted

In the biweekly video reviews, sections are required to review 10 body-worn camera videos from officers, as shown in Exhibit 8. Supervisors evaluate whether the officer began and ended video recording in compliance with department policy.

Exhibit 8: Supervisors Audited Activation and Deactivation Compliance in Biweekly Video Reviews

ATLANTA POLICE DEPARTMENT

Bi-Weekly Watch/Unit BWC Video Review

Date of Review: 11/12/2024 **Zone:** [redacted] **Watch:** [redacted]

Sworn Employee Name (last, first)	Unique ID	Comments (Performing deficiencies & recommended corrective action)	Review Date	Incident Number	BWC Recording from Start of Call?	BWC Recording from End of Call?	BWC Recording Remained on for Entire Call?	Number of BWC Recordings with Proper Category
[redacted]			11/01/2024	[redacted]	Yes	Yes	Yes	Yes
			10/29/2024		Yes	Yes	Yes	Yes
			11/06/2024		Yes	Yes	Yes	Yes
			11/06/2024		Yes	Yes	Yes	Yes
			11/06/2024		Yes	Yes	Yes	Yes
			11/06/2024		Yes	Yes	Yes	Yes
			11/06/2024		Yes	Yes	Yes	Yes
			11/07/2024		Yes	Yes	Yes	Yes
			11/07/2024		Yes	Yes	Yes	Yes
			11/07/2024		Yes	Yes	Yes	Yes

Supervisor and Command sign-off:

[redacted]

Supervisor Auditor Sign-off (Title, Name, Unique ID)

Unit Commander Sign-off (Title, Name, Unique ID)

Source: Screenshot of sample biweekly video review form taken by auditor with identifying information redacted

Supervisors Did Not Complete 30% of Review Forms in 2024

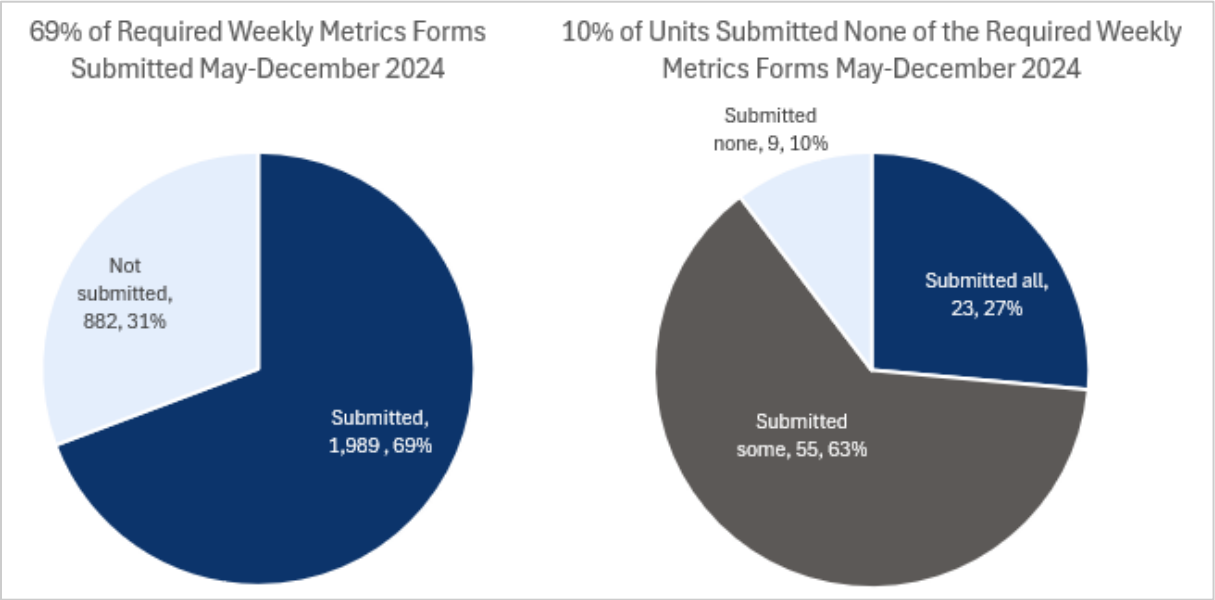
In May 2024, Police digitized the weekly metrics and biweekly video reviews so that supervisors completed these forms directly in Evidence.com. Axon did not have a report to show which forms had been submitted at the time but created one in May 2025. Compliance Unit staff used a spreadsheet to track form submissions but didn't include details from the forms, such as number of categorized videos. We also found errors and inconsistencies within the unit's manual tracking spreadsheet.

Using the May 2025 report, we found that supervisors submitted 69% of the required weekly metrics forms and 68% of the required biweekly video forms from May through December 2024. Compliance unit staff noted that the actual

numbers for 2024 submissions were higher but that some of the 2024 forms were completed in 2025. During our audit, Police also had to submit data related to its supervisory reviews to the Law Department as part of a consent order update from its 2010 *Calhoun vs. Pennington* litigation. Due to the new Axon report's limited metadata, we were unable to verify if any of the reports completed in 2025 were done for the previous year.

The weekly metrics form (Exhibit 7), tracks whether officers have videos for required dispatch calls, whether videos are categorized and labeled, and the last date the officer docked the camera. From May through December 2024, 23 of 87 units submitted all required weekly metrics reviews, as shown in Exhibit 9. Nine units did not submit any of the weekly metrics forms during this period.

Exhibit 9: Supervisors Missing 31% of 2024 Weekly Metrics Forms in May-December



Source: Audit team analysis of Evidence.com weekly metrics forms submitted from May through December 2024

We also reviewed 554 of 1,989 weekly metrics forms that Police made available to us, which were initially pulled for the Calhoun vs. Pennington consent order. In seven percent of the entries we reviewed, supervisors incorrectly marked officers as compliant who had calls missing footage, videos missing ID, uncategorized videos, or a last camera docked date over a month ago. Exhibit 10 shows an example of this. We identified several issues with the forms that made them less reliable, such as supervisors completing reviews in the middle of the audit period, blank fields, and supervisors reviewing their own entries. Another

issue is that supervisors enter the number of dispatch calls from sheets filled out by officers rather than checking dispatch data, which may be more accurate.

Exhibit 10: Supervisor Marked Officer Missing Videos as Compliant

ATLANTA POLICE DEPARTMENT

Weekly Activation Audit of BWC Recording Data Supervisory Report

**** Report Due Monday at 0900 hours ****

Zone: [redacted] Watch: [redacted]

Date Range of Audit	11/10/2024 to 11/16/2024
Cobra Week	46

(Date Range of Audit must coincide with COBRA Week #)

Sworn Employee Name (last, first)	Unique ID	Review Date	Number of Calls for Service	Number of Signal 89, 91, Code 4 Calls	Number of BWC Recordings	Number of BWC Recordings with Incident Numbers	Number of BWC Recordings with Proper Category	Last Date BWC was docked	In Compliance with APD.SOP.3133 Body Worn Cameras (Y/N)
[redacted]		11/10/2024	13	3	10	10	10	11/10/2024	Yes
		11/11/2024	9	4	5	5	5	11/12/2024	Yes
		11/12/2024	4	0	0	0	4	11/12/2024	Yes
		11/13/2024	10	2	8	8	8	11/13/2024	Yes
		11/14/2024	15	7	8	8	8	11/14/2024	Yes

Instructions: Weekly Audit of BWC's. Unit Commanders will need to audit five (5) sworn employees (officer/sergeant) each week. To conduct audit, the unit commander shall:

1. List the employees last and first name;
2. List the employees unique ID;
3. List the review date;
4. List the number of calls for service (from CAD);
5. List the combined number of signal 89, 91, and code 4 calls;
6. List the number of BWC recordings (from
7. List the number of BWC recordings with the correct incident number listed;
8. List the number of BWC recordings that were categorized properly;
10. List the date that the BWC was last docked;
11. Write yes or no to indicate if the employee is in compliance with APD.SOP.3133 Body Worn Camera policy.

Formula: Take the total number of calls for service minus the total combined number of 89, 91, and Code 4 calls. Subtract the number of 89, 91, and Code 4 from the total number of Calls for Service. This total should equal the number of BWC recordings.

Supervisor and Command sign-off:

[redacted]

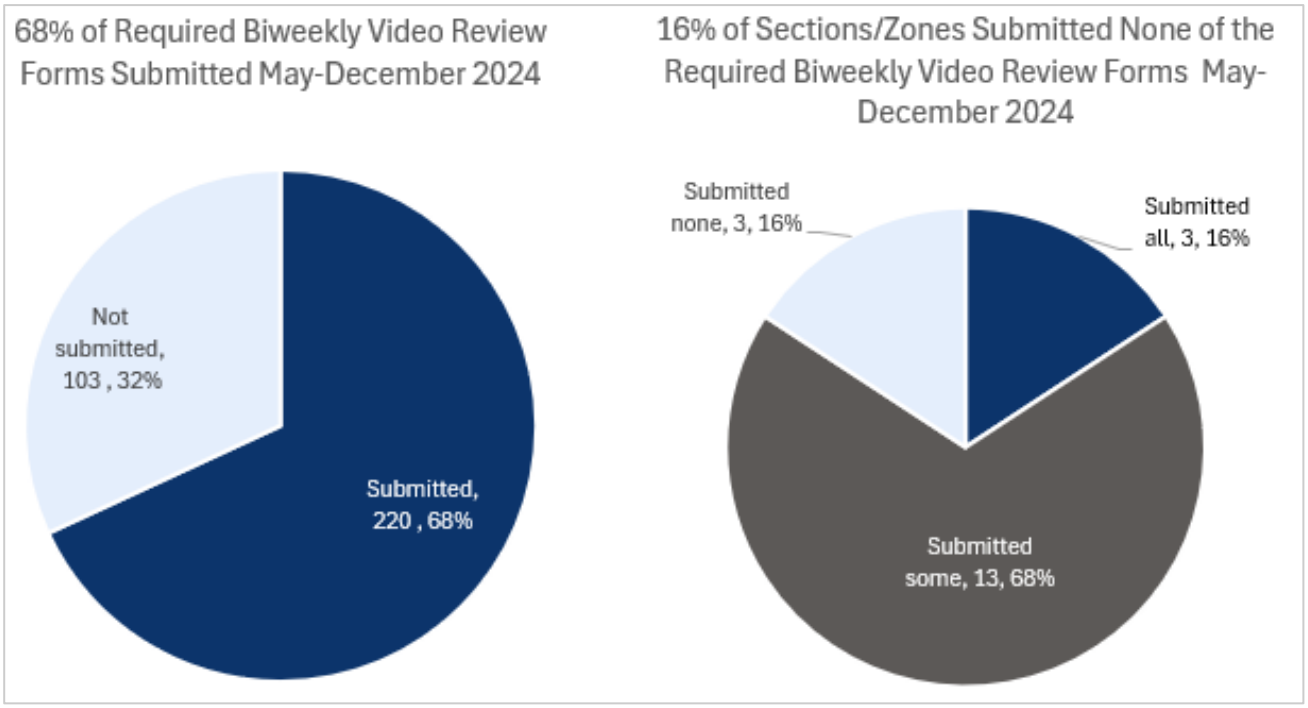
Supervisor Auditor Sign-off (Title, Name, Unique ID)

Unit Commander Sign-off (Title, Name, Unique ID)

Source: Screenshot of sample weekly metrics form taken by auditor with identifying information redacted

The biweekly video review form (see Exhibit 8) evaluates whether officers began and ended video recordings properly according to department policy. From May through December 2024, 3 of 19 sections submitted all required biweekly video forms, as shown in Exhibit 11. Another three sections did not submit any forms during this period.

Exhibit 11: Police Lacking 32% of 2024 Biweekly Video Review Forms May-December



Source: Audit team analysis of Evidence.com biweekly video review form submissions

We sampled a two-month period from late October through December 2024 and reviewed all the biweekly video review forms. Evidence.com showed 220 forms total for 2024. Police provided us with 98 forms from Evidence.com to cover the sampled two-month period. Of the 98 sampled forms, 71% reviewed fewer than the required 10 videos, as shown in Exhibit 12. It is important for sections to include all 10 videos as these forms are a small sample of the total body-worn camera videos and help ensure officers are following department policy. We found several other issues with the biweekly video forms as well that made them less reliable, such as supervisors reviewing their own videos and only having one of two required reviewers.

We recommend that the chief of police acquire, if feasible, the capability to track supervisory review forms and dispatch metrics in Evidence.com to more effectively monitor review form compliance and department-wide metrics.

Exhibit 12: Supervisor Only Reviewed Five of Ten Required Videos

ATLANTA POLICE DEPARTMENT

Bi-Weekly Watch/Unit BWC Video Review

Date of Review: 12/08/2024 **Zone:** [redacted] **Watch:** [redacted]

Sworn Employee Name (last, first)	Unique ID	Comments (Performing deficiencies & recommended corrective action)	Review Date	Incident Number	BWC Recording from Start of Call?	BWC Recording from End of Call?	BWC Recording Remained on for Entire Call?	Number of BWC Recordings with Proper Category
[redacted]		No Concerns.	10/25/2024	[redacted]	Yes	Yes	Yes	Yes
		No Concerns.	12/02/2024		Yes	Yes	Yes	Yes
		No Concerns.	11/12/2024		Yes	Yes	Yes	Yes
		Accidental Recording.	11/25/2024		Yes	Yes	Yes	Yes
		No Concerns.	12/07/2024		Yes	Yes	Yes	Yes

Supervisor and Command sign-off:

[redacted]

Supervisor Auditor Sign-off (Title, Name, Unique ID) **Unit Commander Sign-off (Title, Name, Unique ID)**

Source: Screenshot of sample biweekly video review form taken by auditor with identifying information redacted

Compliance Team Reviews Are Not Documented

As of 2024, the Compliance Administrator told us that he conducted his weekly video review through Evidence.com. The system does not have any formal documentation of which videos were reviewed, although it is possible to find them by searching through users' audit trails. The Compliance Administrator said he uses the randomized video audit feature in Evidence.com to conduct these reviews. We also found that the supervisors' biweekly video review forms did not contain clear enough identification to see the exact video viewed, as officers may have multiple videos tagged with the same incident number.

We recommend that Police acquire, if feasible, the capability to integrate identifying information for randomized videos audited by supervisors and the compliance unit.

Recommendations

To improve video capture, the Chief of Police should:

1. clarify proper activation and deactivation for supervisor compliance determination and enforce this consistently
2. create guidance for camera activation and deactivation related to non-dispatched calls and non-sworn employees, as well as when non-field staff must turn on cameras

To strengthen video categorization and retention, the Chief of Police should:

3. provide guidance on when to use categories that have longer retention periods

To enhance oversight of the body-worn camera program, the Chief of Police should:

4. acquire, if feasible, the capability to track supervisory review forms and dispatch metrics in Evidence.com to more effectively monitor review form compliance and department-wide metrics
5. acquire, if feasible, the capability to integrate identifying information for randomized videos audited by supervisors and the compliance unit

Appendix A: Management's Response

Report Title: APD Body Worn Camera Follow Up		**Project No.** 25.01
Recommendation #1: We recommend that the chief of police clarify proper activation and deactivation procedures and ensure supervisors enforce the procedures consistently.		
Risk Category: Public Safety	**Recommendation Priority:** Medium	**Auditee Response:** Agree
Related Finding(s): • Officers did not properly activate cameras for 15 of 70 sampled videos (21%) or deactivate for 13 (19%) videos. However, most of these were for videos taken by special unit officers and guidance for special unit activation and deactivation is less clear. • For the 50 videos in this sample that were reviewed by supervisors, supervisors incorrectly marked 17 videos as correctly activated and 13 videos as correctly deactivated. • Police told us supervisors use different criteria for when cameras should be activated and deactivated than what is in policy.		
Proposed Action: **Sampled videos are being reviewed and this provides an opportunity to clarify any gaps in activation/deactivation policies and directives.**		
Name & Title of Business Owner: **Chief Darin Schierbaum**	**Current Status:** Started	**Estimated Implementation Date Month/Year):** **1.28.26**

Recommendation #2: We recommend that the police chief create guidance for camera activation and deactivation related to non-dispatched calls and non-sworn employees, as well as clarify when non-field staff must turn on cameras.		
Risk Category: Public Safety	**Recommendation Priority:** Low	**Auditee Response:** Agree
Related Finding(s): • Policy provides activation and deactivation guidance primarily for sworn officers who are in the field daily and answering dispatch calls. It is unclear about when to activate and deactivate cameras for follow-up work done by special units, such as interviews or arrests. 25 of our 70 sampled videos were recorded for follow-up work, including some employees who are not in the field daily. Two of the 70 videos were taken by non-sworn employees. • Policy lacks guidance on when staff who are not in the field daily should turn on their body-worn cameras. 11 of the 70 sampled videos appeared to not turn their camera on at the beginning of their shift.		
Proposed Action: **The Policy, Research, and Accredidation Unit is reviewing policy to address intstances that involve employees who have BWC's but are not assigned to Field Operations Division.**		
Name & Title of Business Owner: **Chief Darin Schierbaum**	**Current Status:** Started	**Estimated Implementation Date Month/Year):** **10.27.25**

Recommendation #3: We recommend that the chief of police provide guidance on when to use categories that have longer retention periods		
Risk Category: Information Systems	**Recommendation Priority:** Low	**Auditee Response:** Agree
Related Finding(s): • 18 of 70 sampled videos were miscategorized, 2 of which would be subject to a longer retention period and have additional access restrictions if properly categorized.		
Proposed Action: **A review of guidance on categories with longer retention periods will be conducted to determine if it needs updated to include new categories.**		
Name & Title of Business Owner: **Chief Darin Schierbaum**	**Current Status:** Not Started	**Estimated Implementation Date Month/Year):** **1.28.26**

Recommendation #4: We recommend that the chief of police acquire, if feasible, the capability to track supervisory review forms and dispatch metrics to more effectively monitor review form compliance and department-wide metrics.		
Risk Category: Public Safety	**Recommendation Priority:** Medium	**Auditee Response:** Agree
Related Finding(s): • Supervisors did not complete 31% of weekly and 32% of biweekly review forms in 2024. Despite digitizing forms in 2024, Axon did not create a form tracker for Police to use until 2025. Police used a spreadsheet to track form submission, and the tracker had errors and inconsistencies. • Police did not track review form metrics department-wide, which would improve monitoring and tracking to ensure officers are accurately capturing, uploading, and categorizing videos. • Supervisors used forms completed by officers to assess whether officers had videos for all relevant dispatch calls rather than information from dispatch.		
Proposed Action: **This action may require procurement actions outside the current contract, thus limiting the Department's ability to enact the recommendation.**		
Name & Title of Business Owner: **Chief Darin Schierbaum**	**Current Status:** Not Started	**Estimated Implementation Date Month/Year):** **11.25.25**

Recommendation #5: We recommended that the chief of police acquire, if feasible, the capability to integrate identifying information for randomized videos audited by supervisors and the compliance unit.		
Risk Category: Information Systems	**Recommendation Priority:** Low	**Auditee Response:** Agree
Related Finding(s): • The biweekly video review form lacked clear information to identify which specific video supervisors reviewed, which could create difficulties for the Compliance Unit to review and spot-check videos. • The Compliance Administrator's video reviews are not documented. Supervisors and the Compliance Administrator use a randomized video audit feature in Evidence.com to conduct reviews, which may be able to connect to existing review forms.		
Proposed Action: **This action may require procurement actions outside the current contract, thus limiting the Department's ability to enact the recommendation.**		
Name & Title of Business Owner: **Chief Darin Schierbaum**	**Current Status:** Not Started	**Estimated Implementation Date Month/Year): 11.25.25**

Appendix B: Scope and Methodology

We conducted this audit in accordance with generally accepted government auditing standards. Our audit included a review of footage, reports, and other information related to body-worn camera videos created from January through December 2024. In this review, we did not include footage from other Police cameras provided by Axon, such as Fleet or drone videos.

Our audit methods included:

- reviewing Police body-worn camera policy to assess changes and new requirements since the previous audit
- assessing city and state code to identify any updated requirements
- interviewing Police Body-Worn Camera Compliance unit staff and observing walkthroughs to understand department procedures, reporting processes, and control gaps
- analyzing E911 dispatch call data for January through December 2024 as compared to body-worn camera videos in Evidence.com to test video capture. We excluded dispatch calls related to call types not requiring direct police action, including driving by properties while owners were out of town, attending community meetings, and tracking where officers are when doing extra jobs. We also excluded dispatch calls that were not assigned to any officers
- evaluating which Evidence.com roles can delete, share, download, and edit videos to assess risk of evidence tampering or leaks
- reviewing a sample of 70 Body-Worn Camera videos to test whether officers began, ended, and categorized videos accurately, including:
    - a judgmental sample of 50 videos from biweekly video review forms submitted between October 28-December 29, 2024. We tested a manual tracking spreadsheet created by the auditee of biweekly video forms from 2024, which began in May 2024, and identified a period of about 30 consecutive days (three biweekly periods) that had the highest form submission rate. This was October 28-December 29, 2024. We received more videos than anticipated and randomly selected 50 videos from the forms, then also tested this group of videos for whether we agreed with supervisor determinations of accurate activation, deactivation, and categorization. These 50 videos were created by zone officers and other unit staff, such as Homicide.
    - a random sample of 20 videos from Evidence.com that were taken by zone officers from January to October 2024. We added these 20 videos to supplement our previous analysis to ensure that we also assessed videos not reviewed by supervisors. We limited these 20 videos to zone officers only

because zone officers are typically sent on dispatch calls, and departmental guidance for proper activation and deactivation focuses on dispatch calls.

- analyzing a random sample of 98 biweekly video review forms from October 28, 2024, through December 29, 2024, to identify whether supervisors completed the form as required
- interviewing staff from the Atlanta Citizen Review Board, the Atlanta Police Foundation, and City Councilmembers to assess stakeholder concerns
- reviewing a convenience sample of 554 weekly metrics forms from May through December 2024 that Police staff initially pulled for the *Calhoun vs. Pennington* consent order to assess whether supervisors completed the form as required, to identify how often supervisors found employees noncompliant on the sampled forms, and to evaluate if Police followed its process for checking for missing and uncategorized footage
- analyzing Evidence.com reports for weekly metrics and biweekly video review forms from May through December 2024 to test submission rates

Generally accepted government auditing standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C: Status of 2018 Recommendations

2018 Audit Recommendation	Related Finding	Status as of Dec. 2024
1. Clarify policy to state whether all officers responding to an incident must record body camera video	40% of sampled videos lacked footage from all officers on scene	**Mitigated.** Police did not explicitly add language in policy but corrected in practice so that 43 of 45 (93%) of relevant sampled videos had footage from each dispatched officer
2. Update 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	Policy required supervisors to upload use of force videos, but supervisors only uploaded 27% of these videos, and the system was unable to distinguish uploaders in some cases	**Implemented.** Police updated its policy to meet the prior audit's recommendation and closed a previous control gap with the audit trail
3. Clarify criteria for labeling and categorizing videos in standard operating procedures	10% of videos were missing a case number, and in a sample, officers miscategorized 22 videos. Although policy required categorization, it did not provide guidance	**Partially implemented.** Police streamlined categories and added guidance to policy, but guidance on when to use categories that have longer retention periods would improve compliance. 18 of 70 sampled videos were miscategorized, though only two would be subject to a longer retention period and have additional access restrictions if correctly categorized
4. Establish a formal process for zone supervisors' periodic reviews, including the number and selection of videos, frequency, and required documentation	Supervisors streamed 2% of videos, and some had no review process at all	**Implemented.** Police added two documented supervisory review processes to the policy. However, it could not easily track form submissions, and we found supervisors did not complete 30% of review forms in 2024. Axon created a limited report in 2025 to assist in tracking, but working with Axon to improve tracking would improve supervisory reviews
5. Conduct monthly reviews of user roles and permissions to determine if non-administrator users can delete videos	64 videos deleted by non-administrator users	**Mitigated.** Police did not conduct monthly reviews but had a process for updating roles and limited the ability to delete videos to administrators
6. Enforce policies requiring the compliance team to review all deleted footage	Compliance staff reviewed less than 1% of videos prior to deletion	**Mitigated.** Department policy did not require this review but extended the

2018 Audit Recommendation	Related Finding	Status as of Dec. 2024
prior to deletion for miscategorization		minimum video retention to five years, which reduced risk to an acceptable level
7. Develop standard justifications for accessed footage to ensure compliance with the policy	20% of the videos streamed included justification notes despite SOPs requiring a note. Of those that had justification notes, some were unclear.	**Mitigated.** Police added a requirement in policy for staff to leave a justification when accessing videos and made updates to role types, category restrictions, and permissions that help limit privileges to only those necessary
8. Monitor and track the number and percentage of videos captured compared to the number of dispatched calls, using the 80% threshold as a comparative benchmark	67% of officer-dispatched calls had no matching body-worn camera footage. Department staff said they would expect officers to have body-worn camera videos for at least 80% of dispatched calls.	**Partially implemented.** Weekly metrics forms captured some, but not all, of these metrics. 88% of officer-dispatched assignments had matching body-worn camera videos. Working with Axon to integrate dispatch metrics would improve monitoring
9. Monitor and track the number and percentage of videos uploaded to the system within one day	74% of videos were uploaded within one day of creation, which SOPs required	**Partially implemented.** New technology in Police vehicles uploaded body-worn camera videos during recording and the current camera model has increased storage space, which reduces potential risks. Weekly metrics forms also captured the last date officers docked their cameras, but working with Axon to capture department-wide metrics would better track this
10. Monitor and track the number and percentage of uncategorized videos	Found 1,780 uncategorized videos of 491,753 videos, which is less than 0.4%, but categorization impacts retention	**Implemented.** Compliance staff tracked uncategorized videos biweekly
11. Monitor and track the number and percentage of videos streamed by supervisors	Supervisors streamed only 2% of all videos	**Partially implemented.** Police captured some of this information on biweekly video review forms, but the forms were not clear about the specific video viewed. Better identification and monitoring the metrics department-wide would better monitor this
12. Monitor and track the number and percentage of videos deleted before the retention schedule	Compliance staff reviewed less than 1% of videos prior to deletion	**Mitigated.** Department policy did not require staff to track this but reduced risk to an acceptable level by extending minimum video retention to five years and limiting deletion privileges to administrators. 30 of 57 roles could edit, share, or download any videos, however; streamlining and limiting these privileges would further reduce potential risks

2018 Audit Recommendation	Related Finding	Status as of Dec. 2024
13. Monitor and track the number and percentage of videos audited by the compliance team	Compliance staff not reviewing videos as required	**Partially implemented.** The Compliance unit reviews the two supervisory review forms, but this does not always include video reviews. The Compliance Administrator said he also conducted a weekly review of videos but did not document these. Working with Axon to integrate documentation of video audits would eliminate the need to separately document this review
14. Monitor and track the number and percentage of audited videos that complied with activation procedures	61% of sampled videos complied with activation policy	**Implemented.** Supervisors reviewed compliance via biweekly video forms and, in a sample, properly activated cameras 79% of the time compared to 61% in a 2018 sample. We reviewed 50 of these 70 sampled videos' biweekly review forms and disagreed with supervisor determination of proper activation for 17 of 50 videos (33%). Also, officers appeared to not turn their cameras on at the beginning of their shift as required for 11 of the 70 videos. Police could improve monitoring with clearer guidance on activation and powering on the camera in different situations and department-wide tracking of metrics
15. Monitor and track the number and percentage of audited videos that complied with deactivation procedures	47% of sampled videos complied with deactivation policy	**Implemented.** Supervisors reviewed compliance via biweekly video forms, and, in a sample, properly deactivated cameras 81% of the time compared to 47% in a 2018 sample. We reviewed 50 of these 70 sampled videos' biweekly review forms and disagreed with supervisor determination of proper deactivation for 14 of 50 videos (28%). Police could improve this with clearer guidance on deactivation in different situations and department-wide tracking of metrics
16. Monitor and track the number and percentage of audited videos categorized accurately	Categorized almost all videos but sample found 22 miscategorized videos, including one that should have been categorized as "use of force"	**Implemented.** Supervisors reviewed categorization via biweekly video forms, but Police could improve accuracy with clearer guidance on categorization and department-wide tracking of metrics

Source: Developed by auditors based on previous audit recommendations and current assessment of implementation status