

**TWO HARBORS POLICE DEPARTMENT
BODY-WORN CAMERA POLICY**

POLICY #D-18

I. PURPOSE

The purpose of this policy is to establish uniform guidelines, which the peace officers and civilian staff of the Two Harbors Police Department shall follow for the use, management, access, retention, handling of evidence, degaussing storage, and retrieval of audio-video media recorded by a body worn camera (BWC) system.

II. POLICY

It is the policy of the Two Harbors Police Department to use mobile video recording (Body Worn Camera) technology to document law enforcement interaction and contact with the public, in the course of their official duties.

III. DEFINITIONS

- A. Body Worn Camera (BWC)** – A device worn by a peace officer that is capable of recording both video and audio footage of the peace officer’s activities and interactions with others or collecting multimedia evidence as part of an investigation as provided in Minnesota Statute 13.285.
- B. Peace Officer** – A person licensed in the State of Minnesota and employed with the Two Harbors Police Department who performs law enforcement related duties.
- C. Activate** – Any process that causes the BWC system to transmit or store audio-visual signals.
- D. MGDPA** – The Minnesota Government Data Practices Act, Minnesota Chapter 13.
- E. PODPA** – The Peace Officer Discipline Procedures Act, Minnesota statute 626.89.
- F. Property & Evidence Technician** – A person employed with the Two Harbors Police Department certified or trained in receiving and storing evidence and property, maintaining property inventory reports with proper “chain of custody” notations and all actions and functions associated with property or evidence.

G. Supervisor – The Chief of Police or the Assistant Chief of Police of the Two Harbors Police Department.

H. Recorded Media – Audio-visual signals that are recorded and stored.

I. Records Retention Schedule – Refers to the General Records Retention Schedule for Minnesota cities.

IV. OPERATIONAL OBJECTIVES

The Two Harbors Police Department has adopted the use of the BWC system to accomplish the following objectives:

1. To enhance the safety of the public and peace officers
2. To document statements and events while responding to and while at various incidents a peace officer may respond to or be present at
3. To enhance the peace officers' ability to document and review statements and actions, for both internal reporting and for courtroom preparation and/or presentation.
4. To preserve visual and audio information for use in current and future investigations, complaints and/or concerns.
5. To provide a tool for evaluation and development of a peace officer through self-critique, during the field training portion of new peace officer on-boarding and training, and during departmental trainings for all staff of the Two Harbors Police Department.
6. To enhance the public trust by preserving video and/or audio recordings of peace officer and citizen interactions

V. PROCEDURES

The Two Harbors Police Department recognizes and understands the value of BWC data. The police department allows its peace officers to activate the BWC system at their discretion, but in compliance with this policy.

The Two Harbors Police Department recognizes and understands there are situations and circumstances where the activation of the BWC system would be unsafe, impossible, or

impractical to do so. In the event this occurs a peace officer shall articulate the details surrounding the BWC system not being activated in an appropriate report.

The Two Harbors Police Department recognizes and understands it is nearly impossible to describe every situation where the BWC system may be utilized. The following shall provide guidance and policy on when activation of the BWC is mandatory, when cessation of recording may occur, when activation is not required, and when activation is prohibited:

A. MANDATORY RECORDING

A peace officer with the Two Harbors Police Department shall activate their BWC system for the following:

1. Lights and/or Sirens are in use.
2. Arrests or Seizures.
3. When placing, removing or transferring custody of a person in their custody, into a patrol squad, who is being transported to jail, hospital, mental health care facility, juvenile detention facility, or detox center.
4. Vehicle Pursuits.
5. Response to crimes in progress.
6. Physical or Verbal Confrontations.
7. Terry Stops (Motorist or Pedestrian).
8. Use of Force by Peace Officer Situations.
9. When in contact with a known off-duty peace officer, who is the victim, witness or subject of a criminal investigation.
10. During crowd control or crowd management situations.
11. When ordered by the Chief of Police or Assistant Chief of Police, or their designee.
12. When seeking "Consent to Search" of persons or property.
13. Initial execution of a search warrant, where entry or seizure of persons or property occurs.

14. When necessary to document any use of force and the basis for such force, the basis for a hold and transport, and documenting any other information of evidentiary value.
15. When responding to a mental health crisis or event and it is necessary to document any use of force and the basis for it, the basis for a hold and transport of the person, and to document any other information having evidentiary value.

B. CESSATION OF BWC SYSTEM

Upon activation of the BWC system, a peace officer of the Two Harbors Police Department may discontinue recording under the following circumstances:

1. At the conclusion of an event, when all arrests have been made and arrestees have been transported.
2. The incident or event is of such duration that the BWC system is deactivated to conserve power or storage capacity.
3. The peace officer does not reasonably believe that the deactivation will result in the loss of critical evidence.
4. Deactivation is reasonable and necessary to protect the peace officer or another person.
5. Deactivation is approved or ordered by the Chief of Police, Assistant Chief of Police, or their designee, who's in charge of the scene.
6. Deactivation is required to protect the identity of persons or other data entitled to protection under the MGDPA or other law.
7. When moving from the sally port to the jail portion of the Lake County Sheriff's Office or like facility.

Peace officers who discontinue a BWC recording while at an ongoing event, investigation or response, shall, when practical and safe to do so, verbally state the reasons for ceasing the recording before deactivation of the recording occurs.

C. ACTIVATION NOT REQUIRED

A peace officer of the Two Harbors Police Department is not required to activate the BWC system under the following circumstances:

1. When exchanging information with other law enforcement officers or support staff.

2. During meal or break periods.
3. When actively patrolling.
4. When attending public events/meetings/activities.
5. When out of service.
6. When providing or are present during when persons are being provided medical care.
7. When responding to an apparent mental health or crisis event to only record symptoms and behaviors associated with the mental health issue.

D. ACTIVATION PROHIBITED

A peace officer of the Two Harbors Police Department may not activate the BWC system under the following circumstances:

1. Peace officers of the Two Harbors Police Department should not record in a hospital, detox center, mental health care facility, juvenile detention center, jail or prison;

In the event a peace officer of the Two Harbors Police Department anticipates witnessing a criminal event or being involved in or witnessing an adversarial encounter or use-of-force incident, they may elect to activate their BWC system.

2. To surreptitiously use the BWC system for the purpose of recording a conversation or actions of another member of the police department.

Exceptions to this are when authorized by court order, or for a lawful reason (criminal or administrative investigation) authorized by the Chief of Police or their designee.

3. To record non-work-related activities while on or off duty.

E. DOWNLOADING & LABELING

A peace officer of the Two Harbors Police Department will be responsible for the transfer and labeling of recorded data from their BWC, through the following procedures:

1. A transfer of data occurs when the peace officer places a BWC into the docking station at the end of an event or end of shift, whichever is appropriate.

2. Labeling of the BWC data files shall occur after the transfer to storage has been completed. Labels that are authorized for the Two Harbors Police Department are as follows:

- a. **ARREST/CITATION** - The data documents the events or details involving the physical arrest of an individual, including the placement and/or removal of an individual from the patrol squad.

The data documents the events or details involving the issuance of a citation.

- b. **CIVIL** – The data documents the events or details involving an event which is non-criminal in nature, but a response from a peace officer has occurred.
- c. **CRIMINAL SEXUAL CONDUCT INVESTIGATION (CSC INV)** – The data documents events or details involving a criminal sexual conduct initial report and/or investigation.
- d. **DEATH INVESTIGATION/HOMICIDE** – The data documents events or details involving the death of a person or persons.

- e. **EQUIPMENT TEST/ERROR** – The data documents the test of equipment (BWC, emergency lighting, holster sensors, etc.) which a peace officer should maintain and may utilize in the performance of their duties and responsibilities.

The data documents an accidental activation of the BWC.

- f. **EVIDENCE/INTERVIEW** – The data documents items of evidentiary value (physical evidence, scene documentation, statements of victims, witnesses, and suspects, etc.).
- g. **LAW ENFORCEMENT CALL FOR SERVICE (LE/CFS)** – The data documents events or details involving the response to or self-initiated activity of a peace officer, and there is a need to, or the peace officer believes there is a benefit to capturing the data.
- h. **MOTOR VEHICLE CRASH** – The data documents events or details involving the crash of a motor vehicle or vehicles.
- i. **TRAFFIC STOP/WARNING** – The data documents events or details involving a TERRY STOP of a motor vehicle and no citation is issued.

- j. TRAINING** – The data documents events or details involving the actions of a peace officer, which may later be used for coaching and/or feedback to peace officer trainee’s or for the purposes of future departmental trainings.

The data documents events or details involving peace officers of the Two Harbors Police Department involved in training activities.

- k. TRANSPORT** – The data documents events or details involving a person or persons being placed into the front or rear seat, whichever is appropriate, or removed from the front or rear seat, before or after the person is transported to an appropriate locations (jail, prison, hospital, clinic, mental health facility, detox center, residence, lodging facility, etc.)

- l. USE OF FORCE – OFFICER INVOLVED SHOOTING (USE OF FORCE-OIS)** – The data documents events or details involving the Use of Force or Officer Involved Shooting by a peace officer during the performance of their duties. A separate Use of Force report is also required in these circumstances.

- m. VEHICLE PURSUIT** – The data documents events or details involving the pursuit of a fleeing motor vehicle, or the response to a report of a vehicle pursuit, which the peace officer is responding to or is or will be involved in.

- 3. “Flagging” of BWC data** shall be completed by the peace officer from which the data was created, by a Supervisor, or by the Records Clerk/Evidence Technician, and will be completed under the following circumstances:

- a. Victims/Alleged Victims of Criminal Sexual Conduct and/or Sex Trafficking**
- b. Victims of Child Abuse or Neglect**
- c. Vulnerable Adults – Victims of Maltreatment**
- d. Undercover Peace Officers**
- e. Informants**
- f. Video is clearly offensive to common sensitivities**
- g. Victims and Witnesses to Crimes, if the party requests to not be identified publicly**

- h. Individuals who called 911, and service subscribers whose lines were used for such call
 - i. Mandated Reporters
 - j. Juvenile Witnesses, if the nature of the event or details justify protecting the party
 - k. Juveniles, who are or may be delinquent, or are engaged in criminal activity
 - l. Individuals who make complaints about violations with the respect to the use of real property
 - m. Other individuals' identity that the peace officer believes may be protected from public disclosure.
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VI. RESPONSIBILITIES

A. PEACE OFFICER RESPONSIBILITIES

Peace Officers of the Two Harbors Police Department shall comply with the following guidelines for use of the BWC system and shall have the following responsibilities when the BWC is worn or required to be worn.

1. All peace officers of the Two Harbors Police Department shall receive training and instruction on the use and operation of the BWC system.
2. Uniformed patrol officers of the Two Harbors Police Department shall be required to wear the BWC as part of their uniform. The BWC shall be worn or affixed to the outer layer (uniform shirt, uniform jacket, etc.), between the waistline and below the shoulders, and in a position where the video and/or audio recording features of the BWC are not obstructed.

Non-uniformed peace officers of the Two Harbors Police Department assigned a BWC shall utilize the system at their discretion, while conducting criminal investigations, but must remain in compliance with this policy.

ALL peace officers of the Two Harbors Police Department, whether in uniform or not, who are actively participating in an enforcement activity (search warrant entry, execution and/or critical incident), shall wear the BWC in compliance with this policy.

3. Peace officers of the Two Harbors Police Department wearing a BWC system shall conduct a functionality test of the issued BWC system at the start of each shift, to ensure proper function.
4. BWC equipment shall automatically activate when the emergency equipment (lights and sirens) is operating, when a peace officer manually starts a recording at their discretion and in compliance with this policy, or when an officer removes the Taser or Handgun from their respective holster.
5. BWC systems shall be configured to record thirty (30) seconds prior to the event.
6. Supervisors and other assigned personnel may access BWC data for the purposes of reviewing or investigating a specific incident that has given rise to a complaint or concern about misconduct or performance by a peace officer of the Two Harbors Police Department.

Nothing in this policy limits or prohibits the use of BWC data as evidence of misconduct or as a basis for discipline.

The BWC is not intended to be used for the purpose of surveillance of peace officers or initiating disciplinary action against a peace officer.

7. Peace officers who serve as instructors (defensive tactics, electric conductive weapons, firearms) for the Two Harbors Police Department, who wish to preserve and retain BWC data for training purposes shall receive approval from the Chief of Police, or their designee.

Objections to the preservation and retention of BWC data for training purposes will be considered on a case-by-case basis, and the decision of the Chief of Police or Assistant Chief of Police related to the objection shall be final.

Peace officers who serve as Field Training Officers for the Two Harbors Police Department may utilize BWC data for the purpose of providing coaching and feedback on a trainee's performance.

8. Peace officers of the Two Harbors Police Department who wear and utilize the BWC system, shall indicate within an appropriate report that such data was created and should be preserved in compliance with department policies and state law.
9. Peace officers of the Two Harbors Police Department involved in a shooting, in-custody death, or other law enforcement activity resulting in death or great bodily harm, shall transfer possession of their BWC to a Supervisor, when appropriate and is safe to do so, or upon order by said Supervisor.

10. Peace officers of the Two Harbors Police Department do not have an obligation to notify or inform people a BWC is being utilized or the individual is being recorded.

B. SUPERVISOR RESPONSIBILITIES

The Chief of Police and Assistant Chief of Police for the Two Harbors Police Department shall have the following responsibilities, as related to the BWC system and the audio and video recordings produced.

Supervisors of the Two Harbors Police Department are not required to wear a BWC in the course of their normal duties. If and when a Supervisor participates in an enforcement activity, works with or covers a patrol officer shift, the Supervisor shall wear the BWC as stated for a uniformed patrol officer, or as a non-uniformed peace officer, whichever is appropriate.

1. When a peace officer is involved in a shooting, in-custody death, or other law enforcement activity resulting in death or great bodily harm, a supervisor shall take custody of the peace officers BWC and assume responsibility for transferring and labeling the data.
2. Supervisors of the Two Harbors Police Department shall document and maintain records of the following:
 - a. Total number of BWC maintained by the Two Harbors Police Department.
 - b. Total number of BWC deployed and used by the peace officers of the Two Harbors Police Department, and in the City of Two Harbors.
 - c. Peace officer to which the BWC was assigned.
 - d. Total amount of BWC data collected and maintained.
3. Supervisors of the Two Harbors Police Department shall document the BWC serial number issued to each peace officer of the Two Harbors Police Department.
4. Supervisors of the Two Harbors Police Department shall, upon request by a peace officer of the Two Harbors Police Department, ensure that the BWC is repaired, replaced, or updated in a timely manner.

5. Supervisors of the Two Harbors Police Department shall ensure that peace officers are downloading, labeling, and preserving BWC data in accordance with policy, procedure, and statute.
6. Supervisors of the Two Harbors Police Department shall review and assist current and newly hired officers in the proper use of the BWC system until the officer demonstrates a working knowledge of the BWC in accordance with the Two Harbors Police Departments policy and procedures.

C. TECHNICIAN RESPONSIBILITIES

The Chief of Police and Assistant Chief of Police have assigned the Records Clerk/Evidence Technician of the Two Harbors Police Department to have the following responsibilities:

1. Responsible for the retrieval, storage, degaussing, and duplication of a BWC data.
2. Responsible for the collection of all completed media and/or for the oversight and verification of BWC data.
3. Responsible for degaussing BWC data, but only for the following reasons:
 - a. Pursuant to court order.
 - b. In accordance with established retention policies.
4. Responsible for the following, after approval from the Chief of Police or Assistant Chief of Police:
 - a. Long-term storage of media deemed to be of evidentiary value consistent with the agency's evidence storage guidelines and retention requirements.
 - b. Administering User Rights
 - c. Adding and Deleting Users
 - d. Password controls.

VII. ACCESS TO BWC DATA

All recorded media, images and audio recordings are the property of the Two Harbors Police Department and are government data subject to the provisions of the MGDPA.

Dissemination outside the Two Harbors Police Department is strictly prohibited to the extent permitted or required under the MGDPA, PODPA, or other applicable law.

The Two Harbors Police Department establishes the following guidelines for accessing BWC data.

A. DEATH AS A RESULT OF FORCE BY A PEACE OFFICER

1. **ACCESS TO DATA BY SURVIVORS AND LEGAL COUNSEL** - Notwithstanding any other law or policy to the contrary, when an individual dies as a result of force used by a peace officer of this agency, all BWC data documenting the incident, redacted only as required by law, must be made available for inspection by any of the following individuals within five days of their request:

- a. The deceased next of kin.
- b. The legal representative of the deceased individual's next of kin.
- c. The other parent of the deceased individual's child.

The request may be denied if there is a compelling reason that inspection would interfere with an active investigation. If access is denied, the Chief of Police must provide a prompt, written denial to the requestor with a short description of the compelling reason that access was denied. The written denial must also provide notice that relief may be sought from the district court pursuant to Minnesota Statutes section 13.82, subdivision 7.

2. **RELEASE OF DATA TO THE PUBLIC** - When an individual dies as a result of force used by a peace officer of this agency, all BWC data documenting the incident, redacted by law, must be released and classified as public within 14 days after the incident, unless the Chief of Police asserts in writing that the public classification would interfere with an ongoing investigation, in which case the data would remain classified by Minnesota Statutes section 13.82, subdivision 7.

B. Data Subjects – Under Minnesota law, the following are considered data subjects for purposes of administering access to BWC data:

1. Any person or entity whose image or voice is documented in the data.
2. The peace officer who collected the data.
3. Any other peace officer whose voice or image is documented in the data, regardless of whether that officer is or can be identified by the recording.

C. BWC data are presumptively private – BWC recordings are classified as private data about the data subjects unless there is a specific law that provides differently. As a result:

1. BWC data pertaining to people, businesses, or other entities are presumed to be private or nonpublic data.
2. Some BWC data are classified as confidential (see D. below)
3. Some BWC data are classified as public (see E. below)

D. Confidential data – BWC data that is collected or created as part of an active criminal investigation are governed by Minn. Stat. §13.82 and are classified as confidential or protected nonpublic data. This classification takes precedence over the “private” classification listed above and “public” classification listed below. However, special classifications and access rights are applicable to BWC data documenting incidents where a peace officers use of force results in death. (See A (1.) and (2.) above.)

E. Public data – The following BWC data are public:

1. Data that documents the discharge of a firearm by a peace officer in the course of duty, other than for training or the killing of an animal that is sick, injured, or dangerous.
2. Data that documents the use of force by a peace officer that results in substantial bodily harm.
3. Data that a data subject requests to be made accessible to the public, subject to redaction. Data on any subject (other than a peace officer) who has not consented to the public release must be redacted. In addition, any data on undercover officers must be redacted.
4. Data that documents the final disposition of a disciplinary action against a public employee is classified as public without regard to any ongoing criminal investigation.
5. However, if another provision of the Data Practices Act classifies data as private or otherwise not public, the data retains that other classification. For instance, data that reveal protected identities under Minn. Stat. §13.82 (e.g., certain victims, witnesses, and others) or other applicable law should not be released even if it would otherwise fit into one of the public categories listed above.

F. Access to BWC data by non-employees – Peace officers receiving requests for BWC data shall refer all requests to the Chief of Police, Assistant Chief of Police, or Records Clerk/Evidence Technician. The request shall be processed in accordance with the MGDPA, City of Two Harbors Policies and Procedures, and other governing laws. In particular:

1. An individual who is the subject of the data has access to the data, including data on other individuals who are the subject of the recording, but access shall not be granted:
 - a. If the data were collected or created as part of an active investigation.
 - b. To portions of the data that the agency would otherwise be prohibited by law from disclosing to the person seeking access, such as portions that would reveal identities protected by Minn. Stat. §13.82, subd. 17.
2. Unless the data are part of an active investigation, an individual data subject may request a copy of the recording, subject to the following guidelines on redaction:
 - a. Data on other individuals in the recording who do not consent to the release must be redacted.
 - b. Data that would identify undercover peace officers must be redacted.
 - c. Data on other peace officers who are not undercover, and who are on duty and engaged in the performance of official duties, may not be redacted.

G. Access by peace officers and law enforcement employees – No employee may have access to the Two Harbors Police Department BWC data except for legitimate law enforcement or data administration purposes. Peace officers may access and view stored BWC video and audio only when there is a business need for doing so, which includes the following:

1. For use when preparing reports or statements or preparing for or providing testimony.
2. To assess proper functioning of BWC systems.
3. By Two Harbors Police Department peace officers assigned to a related criminal investigation, or after approval of a supervisor, for official investigations.

4. By a peace officer who is captured on or referenced in the video or audio data and reviews and uses the data for any purpose relating to their employment.
5. When reasonable and necessary for the peace officer to perform the essential functions of their job or to defend against allegations of substandard performance or misconduct.

To prevent damage to, or alteration of, the original media, it shall not be copied, viewed, or otherwise inserted into any device not approved by the Chief of Police, their designee, or forensic media staff. When reasonably possible, a copy of the original media should be used for viewing to preserve the original media.

Peace officers and/or Records Clerk/Evidence Technician shall not make a copy of any BWC data except in compliance with this policy.

The Two Harbors Police Department shall restrict by password protection access to all BWC data and shall maintain an electronic record of the date, time, and name of each employee who accesses the data.

In no event shall any BWC data be used or shown for the purpose of ridiculing or embarrassing any employee.

H. Other authorized disclosures of data – Peace officers may display portions of BWC footage to witnesses as necessary for purposes of investigation as allowed by Minn. Stat. §13.82. Peace officers should generally limit these displays to protect against the incidental disclosure of individuals whose identities are not public. Protecting against incidental disclosure could involve, for instance, showing only a portion of the video, showing only screen shots, muting the audio, or playing audio but not displaying video. In addition:

1. BWC data may be shared with other law enforcement agencies only for legitimate law enforcement purposes that are documented in an appropriate report at the time of disclosure.
2. BWC data shall be made available to prosecutors, courts, and other criminal justice entities as provided by law.
3. With the approval of the Chief of Police or Assistant Chief of Police, the Two Harbors Police Department may make any data classified as confidential or protected nonpublic pursuant to Minn. Stat. §13.82, subd. 7 accessible to any person, agency, media, or the public if the Department determines that the access will aid the law enforcement process, promote public safety, or dispel widespread rumor or unrest, consistent with Minn. Stat. §13.82, subd. 15.

VIII. BWC DATA RETENTION

1. Retention periods for BWC data are established by law and the Records Retention Schedule. When a particular recording is subject to more than one retention period, it shall be maintained for the longest applicable period.
2. All BWC data shall be retained for a minimum of 90 days. There are no exceptions to erroneously recorded or non-evidentiary data.
3. BWC data shall be maintained for a minimum period of one year, under the following circumstances:
 - a. The data documents the discharge of a firearm by a peace officer in the course of duty, other than for training, or the killing of an animal that is sick, injured, or dangerous;
 - b. Data that documents an incident resulting in a formal complaint against a peace officer.
4. BWC data shall be maintained for a minimum period of five years under the following circumstances:
 - a. The data is determined to have an evidentiary value, related to the termination or separation of the employee who is the subject of the investigation.
5. BWC data shall be maintained for a minimum of seven (7) years under the following circumstances:
 - a. The data documents the use of force by a peace officer that results in substantial bodily harm, or force that is of a sufficient type or degree to require review by the Chief of Police, Assistant Chief of Police, or their designee, under the Two Harbors Police Department – Use of Force Policy.
6. BWC data shall be maintained for up to 180 days under the following circumstances:
 - a. Upon written request by the BWC data subject. The Chief of Police, Assistant Chief of Police, or their designee, shall notify the requestor

at the time of the request that the data will be destroyed following the requested time frame, unless a new written request is received.

7. Other data having evidentiary value shall be retained for the period specified in the Records Retention Schedule.

Subject to the next item below, all other BWC footage that is classified as non-evidentiary, becomes classified as non-evidentiary, or is not maintained for training shall be destroyed after 90 days.

The Department will post this policy, together with a link to its Record Retention Schedule, on its website.

IX. DATA SECURITY SAFEGUARDS

1. Peace officers shall not erase, alter, reuse, modify or tamper with BWC recordings. Only the Chief of Police, Assistant Chief of Police, or their designee, may erase recordings in accordance with this policy.
2. Access to BWC data is only allowed from computers and devices utilized by the Two Harbors Police Department. Personally owned computers and devices shall not be programmed or used to access BWC data.
3. Peace officers shall not intentionally alter, erase or destroy any BWC data or metadata prior to the expiration of the applicable retention period.
4. As required by Minnesota State Statute 13.825, subdivision 9, the Chief of Police, Assistant Chief of Police or their designee shall obtain an independent biennial audit of the BWC program of the Two Harbors Police Department.

Supervisors shall monitor for compliance with this policy. The unauthorized access to or disclosure of BWC data may constitute misconduct and subject individuals to disciplinary action and criminal penalties pursuant to Minn. Stat. §13.09.

X. GENERAL COMPLIANCE

1. The Two Harbors Police Department shall maintain an inventory of BWC recordings having evidentiary value.

2. The Two Harbors Police shall post this policy, together with a link to its records retention policy, on its website.
3. Supervisors shall monitor for compliance with this policy. Noncompliance may constitute misconduct and subject individuals to disciplinary action and criminal penalties pursuant to Minnesota State Statute 13.09.

DRAFT

**TWO HARBORS POLICE DEPARTMENT
BODY-WORN CAMERA POLICY**

POLICY #D-18

XI. SUPERVISORS SIGNATURES

Richard C. Hogenson
Chief of Police

Kenneth L. Anderson
Assistant Chief of Police

XII. EFFECTIVE DATE:

TBD

XIII. REVISED DATE: