**UTA** INTERNAL AUDIT

# Video Security Audit

# 25-04

# January 28, 2026

# Table of Contents

## Rating Matrix

| Descriptor | Guide |
|---|---|
| **High** | Major uncertainties are present. More is unknown than is known. No experience and/or data is available. Structure and resources are not established. |
| **Moderate-high** | Many uncertainties are present. Experience and/or data are limited. Structure and resources are incomplete, unproven and/or immature. |
| **Moderate** | Some uncertainties are present. As much is known as is unknown. Sufficient experience and data exist but may not be fully utilized. Structure and resources are adequate. |
| **Low-moderate** | Minor uncertainties are present. Strong experience and data exist. Structure and resources are well designed and supported. |
| **Low** | Little to no uncertainties remain. Significant experience and data exist and are fully utilized. Structure and resources are robust. |

Risk ratings are determined in consultation with management using UTA's Failure Mode Effects Analysis methodology.

## Distribution List

| Title | For Action[1] | For Information | Reviewed prior to release |
|---|---|---|---|
| Audit Committee | | * | |
| Executive Director | | * | * |
| Director Safety and Security | * | * | * |
| Chief Operating Officer | | * | * |
| Chief of Police – Public Safety Manager | * | * | * |

[1]For Action indicates that a person is responsible, either directly or indirectly depending on their role in the process, for addressing an audit finding.

# Executive Summary

## Introduction

The Utah Transit Authority ("UTA") Audit Committee directed the Internal Audit department ("IA") to conduct a performance audit over UTA's Video Security. The Audit Committee approved the Audit Plan that included this engagement on March 10, 2025.

## Background and Overview

UTA uses video surveillance to enhance and promote public safety, deter criminal activities, assist in maintenance and operational tasks, safeguard property, and support security and Law Enforcement endeavors. UTA has cameras in revenue vehicles, non-revenue vehicles, service platforms, Right of Way property, and facilities. Data is valuable as it can be recalled for instruction, security, and investigation purposes. UTA employs three video security systems that capture all data in vehicles and on UTA property. UTA's Video Security team consists of three security specialists and three technicians overseen by the Video Security Supervisor. The Video Security team is part of UTA Safety and Security's organizational structure.

## Objectives and Scope

IA based the audit objectives and scope on the results of planning procedures that included discussions with management, and assessments of risk and fraud risk. The topics for the audit were:

1.  Governance
    IA reviewed policies and procedure documents, instruction manuals, and job description documents.

2.  Risk Management
    IA verified management's participation in training and surveys from the Enterprise Risk Management department.

3.  Video Security Program Controls
    IA reviewed procedures and controls around key video security activities, including maintenance, video distribution, privacy requirements, and backup and recovery procedures.

4.  Assessment of expanding video security for UTA Police Department
    IA performed research to determine if it would be practical and advisable for UTA Law Enforcement Officers to wear body cameras while on active duty.

IA set the audit period as January 1, 2022, through May 31, 2025.

1. **Governance**

IA reviewed the governing policy and the standard operating procedures ("SOP") to determine how recently management has updated them. The policy governing UTA's video security is formally established but is currently under review and has not been re-adopted since 2021. Management is currently documenting SOP that covers video access, retention, and reporting camera issues. IA recommends that both the policy and SOP be finalized and adopted.

IA reviewed the job description documents for all Video Security positions. Job descriptions exist for all the key positions for UTA Video Security team. All positions have been updated during the reporting period and include minimum experience and job duties. Training efforts are documented through UTA's Learning Management System (LMS) along with the requirement for employees to observe UTA's Audio/Video Security Agreement.

2. **Risk Management**

IA confirmed that management has recently participated in all expected risk management activities with the Enterprise Risk Management department, including the completion of training and risk surveys.

3. **Video Security Program Controls**

UTA policy and SOP documents procedures for controlling access to captured audio and video data. This is true for live monitoring, video data analysis, and requesting recordings for a specific event. Monitoring video live is reserved for control centers and the video security team only for permitted purposes: promoting safety for patrons and employees, safeguarding UTA property, improving emergency responses, and assisting Law Enforcement responders when necessary. Unauthorized personnel do not have access to UTA control centers where live camera feeds are monitored.

Any access to recorded data must be approved by the Video Security Supervisor. The application process requires internal requestors to document justification for their request, provide a specific event or timestamp, get approval from their manager, confirm understanding of UTA's Video Security policy, and sign an Audio/Video Security agreement. Any requested video pulled via the process is preserved and stored in accordance with UTA retention policies. Policy and the audio/video security agreement clearly outline prohibited uses of video security and refer to privacy considerations and requirements. While current policy is clear, it does not restate specific language contained in UTA's Collective Bargaining Agreement about viewing footage. IA recommends that management address this issue.

The Video Security team conducts system maintenance through a ticket system, allowing for other internal stake holders to request maintenance to be done. All completed work is tracked by the Video Security Team.

4. **Video Security Expansion to PD body cameras**

UTA's Police Department (PD) relies on video security equipment to promote public security, safeguard UTA employees, and support officers in law enforcement endeavors. Currently, UTA does not equip its law enforcement offices with body cameras. Body cameras are common nationwide and have been used by local police since 2013. Body cameras can be advantageous to assist PD officers in interactions with the public, corroborate evidence of internal and collaborative PD investigations, and expand transparency. Expansion of body camera usage for UTA

PD would require developing additional policy that aligns with Utah state code. IA recommends that UTA evaluate the feasibility of expanding video security measures by introducing police body cameras.

**5.  Overall Engagement Conclusion**

The UTA Video Security team demonstrates satisfactory performance aligned to organizational objectives, with a limited number of focused improvement opportunities in formalizing governance documents and expanding surveillance.

| **Finding 25-04-01 Complete and Adopt Video Security Policy Edits** | **Risk Level: Low-moderate** |
| --- | --- |

**Criteria**

UTA Board of Trustees Policy No. 1.1 "Process for Establishing Board Policies", II.D.1. states,

> *All policies and procedures including Board policies, UTA Policies, and Standard Operating Procedures will be reviewed for revision or confirmation as required by statute at least every three years.*

**Condition**

IA reviewed the main governing Video Security policy to determine its last date of review. The last update and adoption of the policy was in 2021. Management has been active in updating and reviewing the Policy since August 2024.

Policy references prohibited use of video security but does not include verbiage matching prohibited data usage contained in UTA's Collective Bargaining Agreement.

**Cause**

Not applicable.

**Effect**

- Outdated policies may be obsolete, unclear, and can decrease business unit efficacy.
- Internal use and understanding of policy may not comply with structure and addendums of redline version.

**Recommendation**

1. We recommend that Video Security management finalize and adopt the recent review of UTA's Video Security Policy.
2. We recommend that Video Security management update the policy so that language around prohibited video security usage matches UTA's Collective Bargaining Agreement.

**Management Response and Action Plan:**

Management agrees with the recommendation and recognize the importance of updating policies and procedures. Safety & Security has a 3rd party company reviewing and helping us with SOP's and Policy within the S&S department.

**Responsible:**

Video Security Supervisor

**Target Completion Date:**

Q4 2026

## Criteria

UTA Board of Trustees Policy No. 1.1 "Process for Establishing Board Policies", II.D.1. states,

> *All policies and procedures including Board policies, UTA Policies, and Standard Operating Procedures will be reviewed for revision or confirmation as required by statute at least every three years.*

## Condition

Management has drafted an SOP that outlines standard practices used to manage video security and support UTA's Video Security policy. The document establishes the process of requesting access to the system and general maintenance. Requesting specific video or general system access is a distinct process that various stakeholders may need to review to successfully engage in the process. Any additional procedural standards contained in the same document weakens focus on how UTA personnel can retrieve data. The additional procedures for video system maintenance (reporting issues and scheduled assessments) could be separated into a separate SOP document for easier reference and division of procedures. As the SOP has yet to be adopted, the control environment cannot be considered finalized.

## Cause

Not applicable

## Effect

- Outdated operating procedures may not reflect current controls and can decrease business unit effectiveness.
- Information security processes may be compromised if SOPs are not compliant and up to date with adopted practices.

## Recommendation

1. We recommend that Video Security management finalize and adopt the Video Security SOP to formally set the key controls of Video Security processes.

2. We recommend that Video Security management consider dividing the Video Security SOP into two separate SOP documents focusing on the following:
   a. Video System Access, Requests, and Retention, including retention abilities and schedules of all video security systems.
   b. Reporting System Issues and Assessments, including establishing schedules for completing and tracking functionality assessments.

## Management Response and Action Plan:

Management agrees with the recommendation and recognizes the importance of updating policies and procedures. Safety & Security has a 3rd party company reviewing and helping us with SOP's and Policy within the S&S department.

## Responsible:

Video Security Supervisor

**Target Completion Date:**
Q4 2026

| Finding 25-04-03 Video Security Body Camera Adoption | Risk Level: Moderate |
|---|---|

**Criteria**

Committee of Sponsoring Organizations of the Treadway Commission (COSO) principle 10 states,

> *The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.*

> *Management considers how the environment, complexity, nature, scope of its operations, as well as the specific characteristics of its organization, affect the selection and development of control activities.*

UTA Policy: UTA.03.02 "Video Security Policy" states,

> *The Video Security System is used to enhance and promote public safety, deter criminal activities, assist in maintenance and operational tasks, safeguard Utah Transit Authority (UTA) property, and support security and Law Enforcement endeavors.*

**Condition**

UTA currently does not use police body cameras but relies on fixed cameras at facilities and on vehicles to support security and law enforcement endeavors. Interviews with management and transit police outside of UTA illustrate that equipping UTA's police department (PD) with body cameras would be advantageous. Body cameras would improve documentation of interactions between officers and the public, corroborate evidence of internal and collaborative PD investigations, lead to quicker resolution of any investigations, and expand transparency. Furthermore, research published in 2020 by the National Police Foundation suggests that body cameras can have a positive impact on investigations and community attitudes if integrated with the other tools and controls used by UTA PD.

**Cause**

Not applicable.

**Effect**

- Documentation of PD interaction with the public may be limited depending on location and available audio.
- Data used for internal and external PD collaborative investigations is subject to system limitations.
- Use of PD body cameras can increase transparency and positive perception from UTA's ridership and the community.
- PD body cameras can capture more accurate data of PD interactions with the public to verify evidence in investigations.

**Recommendation**

1. We recommend that Video Security management work with the UTA Police Department to determine the advisability and feasibility of incorporating body cameras into UTA's video security measures.

a.  Considerations in the evaluation should include cost, legal, data management, civil rights considerations, and public relations considerations.

**Management Response and Action Plan:**
Management agrees with this recommendation and recognizes the potential benefits from body-worn cameras but is aware of potential implementation challenges. Management will work with key stakeholders to perform a risk assessment and feasibility study for body-worn cameras at UTA PD and provide recommendations upon completion.

**Responsible:**
Director, Safety and Security

**Target Completion Date:**
March 10, 2027