

Minnesota Security Consortium – MNSec

Bringing Information Security to Local Minnesota Governments

UMN Police Department 2025 ALPR Audit (Flock)

Executive Summary

Prepared for City of UMN Police Department

October 15, 2025



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Background:

UMN Police Department retained Minnesota Security Consortium to audit its agency's use of their new Flock ALPR System against the requirements of MN Statute 13.824. Minnesota Security Consortium does not operate or have access to their ALPR systems, therefore allowing it to audit the systems as an independent auditor. UMN Police Department had their new Flock ALPR system operational between 9/1/23 to 8/31/25. They had 10 active stationary ALPR units and no mobile Flock units, at the time of this audit.

Department Policy & Procedures:

UMN Police Department has an ALPR Policy in place entitled, "Policy 654: Automated License Plate Readers (ALPR)." A review of this policy found that the UMN Police Department was compliant with the requirements of the statute, 13.824.

Record Retention:

The UMN Police Department ALPR Flock administrative control panel was audited to ensure that each setting was set for a retention period of no more than 60 days. The entire Flock system has a default 30-day retention period, which is set by the manufacturer. This was confirmed by the Flock Vehicle Reads report. UMN Police Department was found to be compliant with this part of the statute.

Data Security and Access Control:

The UMN Police Department's ALPR system is protected by an Access Control system built into the Flock backend server application. Users and groups were found to be current and appropriate for the intended use by the agency, allowing users only the minimum access that they need to perform their functions. User accounts and role-based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrators are appointed by the UMN Police Department.

A review of all users and their assigned roles was conducted as part of this audit. Roles and access were consistent for each user's job description. The UMN Police Department was found to be compliant in this part of the statute.

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Data Classification:

UMN Police Department ALPR Data that has been collected is classified as private unless access is permitted by law. Public data requests of data collected on a license plate owner's vehicle are readily available through a proper records request via the UMN Police Department. Citizens can fill out the agency's data request form found at:

<https://publicsafety.umn.edu/record-requests-and-citation-information>

UMN Police Department was found to be compliant with this part of the statute.

Sharing Among Law Enforcement Agencies:

Appropriate sharing of ALPR data is conducted through inter-agency requests. The requests are documented by agency name, requesting party and case number by the Records department or in Flock. As a result of these findings, UMN Police Department was found to be compliant with this part of the statute.

Public Log of Use:

UMN Police Department now compiles monthly reports that contain the requirements of 13.824 Subd. 5. Sample reports from the past one month were reviewed during the audit process. These public logs of use are readily available through a proper records request through the UMN Police Department. UMN Police Department was found to be compliant with this part of the statute.

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Notification to Bureau of Criminal Apprehension:

UMN Police Department has made the required notification to the Bureau of Criminal Apprehension. This was validated on the BCA website. UMN Police Department was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

This is their first ALPR Audit of the new Flock system, and they plan on continuing an independent audit every two years, per MN Statute 13.824. Command and IT Staff were very cooperative throughout the entire audit process and understood the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of their ALPR Reports. UMN Police Department was found to be compliant with this part of the statute.

Breach Notification:

UMN Police Department has adopted the University's "Data Security Breach" policy, which conforms to the requirements of 13.824 Subd. 7 (a) and Minn Stat. 13.055. UMN Police Department was found to be compliant with this part of the statute.

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Conclusion:

Based on the results of the UMN Police Department ALPR Audit conducted by Minnesota Security Consortium, we can demonstrate that they were using the ALPR System as an effective law enforcement tool for the purpose of combating auto theft and other crimes linked to vehicle license plates. The UMN Police Department also demonstrated that their security, public accountability, and administration of the program followed MN Statue 13.824.

This Audit was conducted and attested to by:

Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium.

Submitted to:

- UMN Chief of Police
- Minnesota Commissioner of Administration
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Chairs of Legislative Committees
- Minnesota Legislative Library