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Hennepin County Sheriff's Office 2025 ALPR Audit (FLOCK System)

Executive Summary

Prepared for the
Hennepin County Sheriff's Office
October 21, 2025



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Background:

Hennepin County Sheriff's Office retained the Minnesota Security Consortium to audit its agency's use of their ALPR program against the requirements of MN Statute 13.824. The Minnesota Security Consortium does not operate or have access to their Flock ALPR systems, therefore allowing it to audit the systems as an independent auditor. The Hennepin County Sheriff's Office Command and IT Staff provided administrative access to the Flock ALPR System during the audit to review audit criteria. This Audit Period covered 6/1/2023 to 7/31/2025. Hennepin County Sheriff's Office has 4 active stationary Flock ALPR within the County.

Department Policy & Procedures:

Hennepin County Sheriff's Office has an ALPR Policy in place entitled, "Policy 460: Automated License Plate Readers (ALPR)." They have been keeping their policy updated and it contained all the necessary policy statements. A review of this policy found that Hennepin County Sheriff's Office was compliant in this part of the statute.

Record Retention:

The Hennepin County Sheriff's Office 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. Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

Data Security and Access Control:

The Hennepin County Sheriff's Office'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 Hennepin County Sheriff. 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.

Hennepin County Sheriff's Office was found to be compliant in this part of the statute.

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Data Classification:

Hennepin County Sheriff's Office 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 Hennepin County Sheriff's Office. Hennepin County Sheriff's Office 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 made and reviewed through Agency Command.

https://www.hennepinsheriff.org/services/data-requests

As a result of these findings, Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

Public Log of Use:

The Flock ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. Hennepin County Sheriff's Office compiles monthly reports that contain the requirements of 13.824 Subd. 5. Sample reports from the past two months were reviewed during the audit process. These public logs of use are available through a proper records request through the Hennepin County Sheriff's Office. Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

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Notification to Bureau of Criminal Apprehension:

Hennepin County Sheriff's Office made the required notification of the Flock Stationary Devices to the Bureau of Criminal Apprehension. This was validated on the BCA website. The Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

Hennepin County Sheriff's Office had their last audit in 2023 and plans on their next audit in 2 years. 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 the Flock ALPR Systems. Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

Breach Notification:

The Hennepin County Sheriff's Office utilizes the County's Data Breach Policy which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. Hennepin County Sheriff's Office was found to be compliant with this part of the statute

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Based on the results of the Hennepin County Sheriff's Office ALPR Audit conducted by Minnesota Security Consortium, we can demonstrate that they are 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 Hennepin County Sheriff's Office also demonstrated that the security, public accountability, and administration of the program in compliance with MN Statue 13.824.

This Audit was conducted and attested to by:

Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium

Submitted to:

Hennepin County Sheriff's Office

Minnesota Commissioner of Administration, Data Practices Office

Legislative Commission on Data Practices and Personal Data Privacy

Required Members of Legislative Committees

Minnesota Legislative Library