

# Minnesota Security Consortium – MNSec

*Bringing Information Security to Local Minnesota Governments*

## Orono Police Department 2025 ALPR Audit (Flock)

### Executive Summary

Prepared for City of Orono Police Department

October 29, 2025



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## **Background:**

Orono 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. Orono Police Department had their new Flock ALPR system operational between 8/1/23 to 7/31/25. They had 3 active stationary/flex ALPR devices and no squad mobile Flock units, at the time of this audit.

## **Department Policy & Procedures:**

Orono Police Department has an ALPR Policy in place entitled, "Policy Number 3059.0: Automated License Plate Recognition System." A review of this policy found that the Orono Police Department was compliant in this part of the statute.

## **Record Retention:**

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

## **Data Security and Access Control:**

The Orono 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 Orono Police Department.

The Orono Police Department was found to be compliant in this part of the statute.

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## **Data Classification:**

Orono Police Department classifies its ALPR Data 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 Orono Police Department. Citizens can fill out the agency's data request form, "Orono PD Request for Information" at the Public Safety Front Desk. Citizens can also fill out an online request found at:

<https://www.oronomn.gov/182/Requests-for-Information-Police-Reports>

Orono 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, which is all tracked in the Flock system. As a result of these findings, Orono Police Department 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. Orono Police Department compiles monthly reports that contain the requirements of 13.824 Subd. 5. Sample reports from the past month was reviewed during the audit process. These public logs of use are readily available through a proper records request through the Orono Police Department. Orono Police Department was found to be compliant with this part of the statute.

## **Notification to Bureau of Criminal Apprehension:**

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

## **Breach Notification:**

We recommend that the Orono Police Department develop a standalone breach policy that conforms to the requirements of 13.824 Subd. 7 (a) and Minn Stat. 13.055. This is typically done in conjunction with the City's Information Technology (IT) Department. Currently they do reference the breach reporting requirements in section 3059.06 (4) of their ALPR Policy entitled, "Policy Number 3059.0: Automated License Plate Recognition System."

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## **Conclusion:**

Based on the results of the Orono 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 Orono Police Department also demonstrated that their security, public accountability, and administration of the program followed MN Statute 13.824.

This Audit was conducted and attested to by:

Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium.

Submitted to:

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