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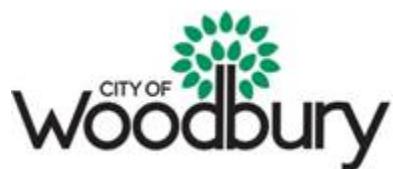
# Woodbury Public Safety

## 2026 ALPR Audit (Flock System)

### Executive Summary

Prepared for City of Woodbury Public Safety

February 5, 2026



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## **Background:**

Woodbury Public Safety 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. Woodbury Public Safety had their new Flock ALPR system operational between 1/1/24 to 12/31/25. They had 17 active stationary Flock ALPR units and no mobile Flock units, at the time of this audit.

## **Department Policy & Procedures:**

Woodbury Public Safety has an ALPR Policy in place entitled, "Policy 431: Automated License Plate Readers (ALPR)." They have been keeping their policy updated and have recently reviewed it. This policy is readily available to the public online at:

<https://www.woodburymn.gov/1204/Automated-License-Plate-Readers>

A review of this policy found that Woodbury Public Safety was compliant in this part of the statute.

## **Record Retention:**

The Woodbury Public Safety 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. Woodbury Public Safety was found to be compliant with this part of the statute.

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

The Woodbury Public Safety's ALPR system was protected by an Access Control system built into the Flock backend server application. User accounts and role-based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrators are appointed by the Director of Public Safety.

A sample 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 Woodbury Public Safety was found to be compliant in this part of the statute.

## **Data Classification:**

Woodbury Public Safety 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 Woodbury Public Safety. Citizens can fill out the agency's Data Request Form at the Police Department's Front Desk. Citizens can also fill out an online request found at:

[https://woodburymn.govqa.us/WEBAPP/\\_rs/\(S\(ici3s1yrsqysn5i0u4mgwk3b\)\)/supporthome.aspx](https://woodburymn.govqa.us/WEBAPP/_rs/(S(ici3s1yrsqysn5i0u4mgwk3b))/supporthome.aspx)

Woodbury Public Safety 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. Agencies can also fill out the online Woodbury MN Data Request Form or by filling out a similar form at the Public Safety Front Desk or other personnel as authorized by the Public Safety Director/Police Chief. The requests are documented by agency name, requesting party and case number. All data sharing that was observed during the audit had a justifiable reason and/or case number. As a result of these findings, Woodbury Public Safety Department was found to be compliant with this part of the statute.

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## **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. Woodbury Public Safety 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 readily available through a proper records request by the Woodbury Public Safety. Woodbury Public Safety was found to be compliant with this part of the statute.

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

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

## **Biennial Public Accountability Audit:**

Woodbury Public Safety installed their new Flock ALPR system in 2022. This is their second 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. Woodbury Public Safety was found to be compliant with this part of the statute.

## **Breach Notification:**

The Woodbury Public Safety utilizes the City's Incident Response Policy which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. Woodbury Public Safety was found to be compliant with this part of the statute.

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## **Conclusion:**

Based on the results of the Woodbury Public Safety 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 Woodbury Public Safety 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:

- Woodbury Director of Public Safety
- Minnesota Commissioner of Administration
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Chairs of Legislative Committees
- Minnesota Legislative Library