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South Lake Minnetonka Police Department 2026 ALPR Audit (Flock System)

Executive Summary

Prepared for South Lake Minnetonka Police Department

April 10, 2026



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Background:

South Lake Minnetonka 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. South Lake Minnetonka Police Department had their new Flock ALPR system operational between 1/1/24 to 12/31/25. They had 4 stationary Flock ALPR units and no mobile Flock units, at the time of this audit. This is their first Flock ALPR Audit.

Department Policy & Procedures:

South Lake Minnetonka Police Department has an ALPR Policy in place entitled, "Policy 5033: ALPR (FLOCK)." They have been keeping their policy updated and have recently reviewed it. This policy is readily available to the public online at:

<https://southlakepd.com/wp-content/uploads/5033-ALPR-FLOCK.pdf>

A review of this policy found that the South Lake Minnetonka Police Department was compliant in this part of the statute.

Record Retention:

The South Lake Minnetonka 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. South Lake Minnetonka Police Department was found to be compliant with this part of the statute.

Data Security and Access Control:

The South Lake Minnetonka Police Department's ALPR system is protected by an Access Control system built into the Flock backend server application. Members of the South Lake Minnetonka Police Department must undergo in-service training of the ALPR Policy prior to being permitted to use the ALPR System. User accounts and role-based accounts are reviewed on a regular basis by ALPR Administrators. 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, and sampling showed that users were being de-activated when no longer with the agency or using the system. The South Lake Minnetonka Police Department was found to be compliant in this part of the statute.

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Data Classification:

South Lake Minnetonka Police Department ALPR Data that has been collected is classified as private unless access is permitted by law. Data requests for data collected on a license plate owner's vehicle are readily available through a proper records request via the South Lake Minnetonka Police Department. Citizens can make the data request by calling the administrative phone number and speaking with an administrative specialist.

South Lake Minnetonka 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 in the Flock system by agency and justification. A sample of the whole month of December 2025 was reviewed as part of the audit, and all samples had a justifiable reason for the ALPR data share to the requesting agency. As a result of these findings, South Lake Minnetonka 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. South Lake Minnetonka Police Department compiles monthly reports that contain the requirements of 13.824 Subd. 5. Sample reports were reviewed during the audit process. These public logs of use are readily available through a proper records request through the South Lake Minnetonka Police Department. South Lake Minnetonka Police Department was found to be compliant with this part of the statute.

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Notification to Bureau of Criminal Apprehension:

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

Biennial Public Accountability Audit:

South Lake Minnetonka Police Department installed their new Flock ALPR system in 2024. 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 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. South Lake Minnetonka Police Department was found to be compliant with this part of the statute.

Breach Notification:

The South Lake Minnetonka Police Department 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. South Lake Minnetonka Police Department was found to be compliant with this part of the statute.

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Conclusion:

Based on the results of the South Lake Minnetonka 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 South Lake Minnetonka 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:

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