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Stillwater Police Department 2026 ALPR Audit (Flock System)

Executive Summary

Prepared for Stillwater Police Department

September 6, 2026



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Background:

The Stillwater Police Department retained the Minnesota Security Consortium to audit its agency's use of their new Flock ALPR System against the requirements of MN Statute 13.824. The Minnesota Security Consortium does not operate or have access to their ALPR systems, therefore allowing it to audit the systems as an independent auditor. The Stillwater Police Department had their new Flock ALPR system operational between 8/1/24 to 7/31/26. They currently have 17 stationary Flock ALPR units at the time of this audit. This is their first Flock ALPR Audit.

Department Policy & Procedures:

The Stillwater Police Department has an ALPR Policy in place entitled, "Policy 427: 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.stillwatermn.gov/city-government/departments/police/policies#docaccess-0b6a1769d879ef9b64c202d2013b5ad4>

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

Record Retention:

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

Data Security and Access Control:

The Stillwater Police Department's ALPR system is protected by an access control system built into the Flock backend server application. Members of the Stillwater Police Department must undergo in-service training in the Flock System and sign off on 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 was conducted as part of this audit. Roles and access were consistent for each user's job a review of all users showed that users were deactivated when no longer with the agency or using the system. The Stillwater Police Department was found to be compliant in this part of the statute.

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Data Classification:

Stillwater 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 Stillwater Police Department.

Citizens may also call, email or visit front desk of the police department and request their form called, "Evidence Request Form." This request is then reviewed by a member of the Command Staff prior to being approved. Citizens can also make their data requests online via the website:

<https://www.stillwatermn.gov/city-government/departments/police/evidence-record-request>

Stillwater 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 data search requests for the whole month of July 2026 was reviewed as part of the audit, and all samples had a justifiable reason by the requesting agency. At the time of the audit, Stillwater Police Department's Flock console did not show any out-of-State sharing in the Shared Network section.

Stillwater has also chosen to participate in the Flock Transparency Portal for the Stillwater Police Department. They post this link on the Department's website at:

<https://www.stillwatermn.gov/city-government/departments/police/flock-safety-transparency-portal>

As a result of these findings, the Stillwater Police 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. The Stillwater 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 Stillwater Police Department. Stillwater Police Department was found to be compliant with this part of the statute.

Notification to Bureau of Criminal Apprehension:

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

Biennial Public Accountability Audit:

Stillwater Police Department installed their new Flock ALPR system in 2025. This is their first ALPR Audit of their new Flock system, and they plan on continuing an independent audit every two years, per MN Statute 13.824. Command and Records 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. The Stillwater Police Department was found to be compliant with this part of the statute.

Breach Notification:

The Stillwater Police Department provided us with their policy, "Policy 805: Protected Information," which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. Stillwater Police Department was found to be compliant with this part of the statute.

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Conclusion:

Based on the results of the Stillwater Police Department ALPR Audit conducted by Minnesota Security Consortium, we can demonstrate that they were using the Flock ALPR System as an effective law enforcement tool for the purpose of combating auto theft and other crimes linked to vehicle license plates. The Stillwater 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:

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