Minnesota Security Consortium – MNSec

Bringing Information Security to Local Minnesota Governments

Richfield Police Department November 2026 Flock ALPR

Executive Summary

Prepared for Richfield Police Department

November 3, 2026

Background:

The Richfield Police Department again retained the Minnesota Security Consortium to audit its agency's use of their Flock ALPR System against the requirements of MN Statute 13.824 and some additional security controls recently enabled by Flock in response to the national scrutiny of ALPR systems. They had 8 stationary Flock ALPR units at the time of this audit.

Richfield Police Department recently completed their last Flock ALPR audit in May 2026, covering the period 4/1/24 to 3/31/26. Richfield Police Department decided they wanted an additional Flock ALPR audit conducted to cover the most recent period of 4/1/26 to 9/30/26. Both audits demonstrate that its program continues to adhere to the requirements of MN Statute 13.824, and in some ways, start to exceed the State requirements.

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 Minnesota Security Consortium stays current on ALPR developments by both the Minnesota State Legislature, Minnesota Data Practices Committees and the ALPR vendors.

Summary of additional audit Items covered in this audit:

National and State scrutiny of ALPR systems in the past half-year have caused us to add some additional more stringent methodology to previous methods.

All aspects of the May 2026 Audit were covered again in this November 2026 Audit, and the following additional items were added:

- The entire active and inactive user roster was audited instead of traditional sampling;
- September 2026 was scrutinized for legitimate law enforcement justification for searches;
- Review of additional Flock security and compliance controls; and
- Review of Richfield's restrictions on traditional Flock interagency sharing settings.

Department Policy & Procedures:

Richfield Police Department has an ALPR Policy in place entitled, "142. AUTOMATED LICENSE PLATE RECOGNITION SYSTEM." They have been keeping their policy updated and is being updated again this year. Their currently approved policy is readily available to the public online at:

https://www.richfieldmn.gov/DocumentCenter/View/632/10-042-ALPR-PDF

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

Record Retention:

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

Data Security and Access Control:

The Richfield Police Department's ALPR system is protected by an Access Control system built into the Flock backend server application. Members of the Richfield 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. In this audit we reviewed all active and deactivated users, instead of traditional sampling. We also reviewed all their assigned roles, instead of traditional sampling. Roles and access were consistent for each user's job description. We even scrutinized users that had not logged into the system for over 90 days and determined that they were valid and should remain active. This added scrutiny, instead of traditional sampling, is meant to add additional assurance to interested parties that access control is being closely monitored.

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

Data Classification:

Richfield 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 Richfield Police Department.

https://richfieldmn.govqa.us/WEBAPP/_rs/(S(wsnqjdmxecu320cbqrpd1jvx))/supporthome.aspx

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

Sharing Among Law Enforcement Agencies:

Richfield does not allow traditional Flock sharing of their ALPR data with any other agency other than Edina Police Department, which handles their 911 Dispatch services. Individual agencies can still request individual plate searches but must use Richfield's data request method outside of the automated cloud Flock ALPR system. These restrictive share settings were verified during this audit. All plate searches in the Flock system for the whole month of September 2026 were reviewed as part of the audit, and just like the previous audit sampling, our analysis concluded that all searches had a justifiable reason for the ALPR data shared by the requesting agency personnel. As a result of these findings, Richfield Police Department was found to be compliant with this part of the statute.

Additional Flock Security Compliance tool (Audit Assistance):

The Richfield Police Department recently launched Flock's new Audit Assistance security feature for the Flock ALPR system. Flock's Audit Assistance provides Richfield Police Commanders with additional security alerts if suspicious behavior is detected. It's important to note that suspicious behavior does not mean any wrongdoing was committed but rather triggers a supervisory review. The Richfield Police Department stated they wanted the system to be used properly and will continue to be audited more intensely.

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

Notification to Bureau of Criminal Apprehension:

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

Biennial Public Accountability Audit:

Richfield Police Department installed their Flock ALPR system in 2024. This is their second ALPR Audit of the Flock system, and they plan on continuing an independent audit every two years, or sooner, per MN Statute 13.824. Command Staff was once again 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.

This audit is not only a supplement to the May 2026 audit, but since the audit is a full and complete audit, it resets the 2-year requirement. The next Audit would be expected within the next two years.

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

Breach Notification:

The Richfield Police Department utilizes the City's “CITY OF RICHFIELD GUIDELINES AND PROCEDURES FOR THE MINNESOTA GOVERNMENT DATA PRACTICES ACT” which includes procedures for Breach Notification and acknowledges it will adhere to MN Statute 13.055 and MN Statute 13.824. Richfield Police Department was found to be compliant with this part of the statute.

Conclusion:

This supplemental audit covered a more recent period of use to demonstrate that, during a time when ALPR systems have come under public scrutiny, the Richfield Police Department has continued to maintain its Flock ALPR system in a manner consistent with Minnesota Statute 13.824 while also enabling the additional security features added by Flock to its control panel.

Based on the results of the Richfield Police Department ALPR audit conducted by the Minnesota Security Consortium, we can demonstrate that the department was using the ALPR system as an effective law enforcement tool for combating auto theft and other crimes linked to vehicle license plates. The Richfield Police Department also demonstrated that its security, public accountability, and administration of the program continues to comply with Minnesota Statute 13.824.

This Audit was conducted and attested to by:

Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium.

Submitted to:

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