

Tukwila's Automated License Plate Recognition Program Preliminary Assessment and Recommendations



April 6, 2026
City Council Work Session

The City of opportunity, the community of choice.

Tonight's Work Session – Interim Report:

Senate Bill 6002 Requirements & Pending Changes & ALPR (FLOCK) Preliminary Security Assessment

May 4 Council Work Session:

3rd Party (vendors/contractors) Data Privacy and Security Assessment and Recommendations



Briefing Overview

Joel Bush,
Chief Information Officer

Kari Sand,
City Attorney

Emily Romanenko,
Deputy City Attorney

- Senate Bill 6002 Requirements & Pending Changes
- Summary of Risk Assessment & Recommendations
- Next Steps



Recent State Legislation

Kari Sand,
City Attorney

Emily Romanenko,
Deputy City Attorney

Senate Bill 6002

AN ACT Relating to driver privacy protections and automated license plate reader systems; adding a new chapter to Title 10 RCW; prescribing penalties; and declaring an emergency (effective immediately).



Key Legislative Provisions

- Mandatory registration of ALPR program with State Attorney General's Office ("AGO") within 180 days and annual reporting
- Use of ALPR Data is now restricted
- ALPR Camera placement limited
- Data retention timelines changed
- Auditing requirements
- Images are categorically exempt from Public Records Act ("PRA"), but audit data can be shared with bona fide researchers
- Criminal penalties and civil liability for violations of the new statute



Implications for City of Tukwila

- Review internal ALPR policy
- Review ALPR camera placement
- Update PRA practices
- Adopt audit schedule
- Register ALPR program with AGO



ALPR Risk Assessment and Recommendations

Joel Bush

Chief Technology Officer

Evaluation of how data is protected and compliance to privacy and security requirements.

The assessment focuses on:

- **Third-party vendors and service providers** that manage, store, process, or access City data
- Internal controls that support or rely on third-party safeguards
- Training, Policy and Standard Operating Procedures (SOPs) that function as preventive controls

**Does not include services that are contracted and governed through external government agencies.*



Assessment Scoping Methodology

- Evaluation of the security and privacy practices of vendors
- A risk assessment framework is used to identify vendor risk
- Focus is on those rated Medium-High / High Service Risk.

Service Risk Assessment Results



Assessed Service Risk =

Due Diligence requirements based on risk:

Very Low Service Risk	Low Service Risk	Medium Service Risk	High Service Risk
No further due diligence is required.	Generate Security Assessment Questionnaire based on LOW risk and assess responses. Request and review vendor's information security certifications.	Generate Security Assessment Questionnaire based on MEDIUM risk and assess responses. Request and review vendor's information security certifications and information security policy. Conduct technical assessment. Conduct data breach search.	Generate Security Assessment Questionnaire based on HIGH risk and assess responses. Request and review vendor's information security certifications, information security policy, audit reports (e.g. SOC2), and vulnerability/penetration test results. If no vulnerability/penetration test report is available, request permission to conduct a vulnerability assessment. Conduct technical assessment. Conduct data breach search.



Flock Safety Assessment

- Flock Safety Master Service Agreement (MSA)
- Flock Safety Security Certifications, Accreditations, and Reports
- Tukwila Police Department Policies
- Technical Assessment of Flock Safety's responses to Tukwila's Vendor Security Questionnaire



Flock Safety Assessment - Key Findings

- Change-management gaps may enable inadvertent inter-agency ALPR data sharing.
- Lack of a Public Safety Data Governance Policy
- Flock's Master Service Agreement (MSA) lacks clarity in several areas
- Flock's security posture is strong



Flock Safety Assessment - Recommendations

- Formalize change-management processes through policy
- Adopt a Public Safety Data Governance Policy
- Renegotiate the MSA with Flock to strengthen contractual protection and bring the MSA into compliance with SB 6002



Next Steps

- Continued interpretation & implementation of SB 6002
- Renegotiate Flock Safety MSA
- Updates to City and Department Policies
- Staff Training

May 4 Council Work Session:

- 3rd Party (vendors/contractors) Data Privacy and Security Assessment & Recommendations



Additional Resources

ALPR & Data Privacy/Security Review

- <https://www.tukwilawa.gov/departments/mayors-office/about-automated-license-plate-readers-alpr-in-tukwila/>

Tukwila Police ALPR Transparency Portal

- <https://transparency.flocksafety.com/tukwila-wa-pd>

Tukwila Police Training & Policies

- <https://www.tukwilawa.gov/departments/police/training-and-policies/>



Questions & Discussion

