

City of Tukwila

3rd Party Data Privacy and Security Assessment Flock Contract Update & Recommendation



May 4, 2026
City Council Work Session

The City of opportunity, the community of choice.

Briefing Overview

Joel Bush,
Chief Information Officer

Kari Sand,
City Attorney

Interim Police Chief
Eric Lund

Mayor Tom McLeod

- Third Party Risk Assessment, Recommendations & Roadmap Overview
- Flock Safety Master Service Agreement Update Status
- Administration ALPR Recommendations



3rd Party Risk Assessments Overview

Joel Bush,
Chief Technology Officer

- Mayor directed risk assessment of vendors/contractors regarding data privacy and security
- 5 Recommendations by TIS
- Roadmap to strengthen governance, reduce vendor risk and establish more consistent standards



3rd Party Risk Assessment Recommendations

Technology and Innovation Services



Criminal Justice Information System (CJIS)

CJIS provides secure, standardized information to law enforcement via a central repository for criminal records, fingerprints, and identification data.

Recommendation #1:

Change Management Policy

Bolster administrative controls

- Clear authorization and approval processes
- Random integrity audits to ensure policy compliance
- Review and test changes to ensure accuracy
- Supports Washington State Patrol triennial audit to ensure compliance with FBI CJIS standards



Technology & Innovation Services (TIS) Tools

Recommendation #2:

**Expand Use of TIS
Contract Templates**

Standardize Terms and Conditions

- Consistent security controls
- Privacy requirements
- Vendor accountability



Business System Owner (BSO)

A staff member who is responsible for the entire lifecycle of an information system (e.g. permit system; recreation registration, payroll processing, etc.), including procurement, operation, maintenance, support and replacement.

Recommendation #3:

**Establish BSO Roles,
Responsibilities &
Expectations**

BSO Duties and Responsibilities

- Authorize user access and review role-changes
- Conduct system reviews and audits
- Comply with information security requirements
- Ensure security controls and training
- Support users and facilitate troubleshooting
- Develop and implement BSO training



Third Party Risk Management

Technologies that are not exclusively operated or controlled by the City of Tukwila or that involve significant participation of a nongovernmental entity (e.g. vendor, service provider, developer).

Recommendation #4:

Develop & Implement Vendor Security Assessments

Formalize City-wide approach

- Conduct comprehensive security assessment prior to procurement and upon renewal/re-licensing
- Apply risk tiering to ensure the level of review aligns with the solutions risk profile



Privacy and Data Governance

Data privacy is a set of principles governing how personal data is collected, used and shared. Data governance is the overall framework of policies and processes that defines how the City of Tukwila manages, secures and maintains the quality of all its data.

Recommendation #5:

Unify Privacy and Data Policies and Procedures

City and Public Safety Privacy and Data Policies

- Define how the City collects, uses, discloses, retains and shares data, focusing on legal compliance, equity, security, and individual rights.
- Clarify expectations for vendors access, use, management and protection of City information.



Recommendation Implementation Roadmap

	Recommendation	2026 Timeline	Owners
1	CJIS Change Management Policy	Q2	PD & TIS
2	Technology & Innovation Services Contract Templates	Q2 → Q4	TIS & Legal
3	Business System Owner (BSO) Responsibilities	Q3 → Q4	Departments & TIS
4	3 rd Party Risk Management Program	Q3 → Q4	TIS
5	Privacy & Data Governance Policies	Q3 → Q4	TIS, HR, & PD



Flock Safety Master Services Agreement Update

City Attorney



Flock Safety Master Service Agreement Status Update

Kari Sand,
City Attorney

Flock Safety MSA - Concessions

- Clarify use of data (limited to permitted uses under SB 6002)
- Allow for reporting functions as required by SB 6002
- Restrictions related to sharing settings
- Clarify and tighten data ownership and control
- Specifying disclosure process and limit to court order or subpoena
- Added a termination provision (but still have to pay outstanding fees)
- Added breach notification and reimbursement requirements for City costs incurred related to breach



ALPR Recommendation

Mayor Tom McLeod

Eric Lund,
Interim Police Chief

Maintain use of Flock safety cameras

- Use of technology as a cost-effective and innovative way to deter and solve crime
- ALPR technology captures objective evidence without compromising individual privacy
- Tukwila does NOT provide Flock data to federal immigration enforcement agencies
- ALPR data is used only for local investigative public safety purposes
- Data helps locate wanted criminals, stolen vehicles and/or license plates, and missing or at-risk individuals
- Tukwila will comply with SB 6002, best-practice safeguards, revised Flock contract, revised data security policies



Next Steps

- Continued interpretation & implementation of SB 6002
- Committee review of updated Flock Safety MSA
- Staff training



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

