



AGENDA MEMORANDUM

City Manager

City Council Regular Meeting Date: August 18, 2026

To: City Council
From: Dana A. Souza, City Manager
Date: July 22, 2026

SUBJECT: Flock License Plate Reader Update and Discussion.

BACKGROUND:

City Councilmembers have asked staff to provide City Council with an overview of the Sanibel Police Department's (SPD) use of automated license plate recognition (ALPR) technology, the history of the City's ALPR program and agreement with Flock Safety, and the safeguards governing the system.

Sanibel has used ALPR technology since 2008 as an investigative and traffic-management tool. The City initially purchased its ALPR system from NDI. In 2015, the NDI cameras were replaced with Genetec cameras provided by Johnson Controls. In 2022, Sanibel replaced the Genetec cameras with Flock Safety's Falcon ALPR cameras, which remain in use today.

Although the vendors and camera technology have changed over time, Sanibel's fundamental use of ALPR has remained focused on public safety, criminal investigations, and traffic management. Earlier systems captured vehicle license plates and provided inbound and outbound traffic counts, while the current Falcon system provides improved image resolution and can identify additional observable vehicle characteristics.

2022 Memorandum of Understanding

On July 19, 2022, City Council approved Memorandum of Understanding No. 22-066 with Flock Group, Inc. The MOU authorized SPD to access Flock's technology platform and dashboard for investigative purposes, including the ability to view and search images captured through the Flock system. The MOU limits use of the system to authorized users and lawful purposes and provides for a five-year term.

There are two errors to correct. First, the agenda memorandum states that the agenda item was to renew an agreement with Flock. This is incorrect. The MOU with Flock was intended to replace the aging Genetec cameras with Flock. Second, the signed MOU (included in packet) was signed by me after the City Council approved the MOU. Staff incorrectly dated the City Manager's signature as June 19, instead of July 19, 2022.

The 2022 MOU also states that Flock retains ownership of recordings and data provided through the Flock service. Since that agreement was executed, Flock's standard contractual terms have changed and now provide that customer data belongs to and is retained by the customer. The

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City Attorney and City Manager are reviewing these provisions and have requested an updated MOU from Flock to clarify ownership and control of Sanibel's data.

Sanibel's Current Use of Flock

Sanibel currently operates three Falcon ALPR cameras. Two are located at the Sanibel Causeway and capture license plate images of vehicles arriving on and departing the island. The third is located on Middle Gulf Drive.

The Falcon cameras capture still images of the rear of vehicles and associated information. Flock's processing system converts observable vehicle information, including license plate information, vehicle color, make, body type, and other visible characteristics, into searchable data. The system also provides traffic-volume information used by SPD to better understand traffic conditions and deploy resources.

Sanibel does not use Flock's Raven audio-detection cameras, Condor cameras, or FreeForm scene-searching technology. The City's Falcon cameras do not record audio, use facial recognition, or capture vehicle identification numbers (VINs).

SPD uses or intends to use ALPR information for legitimate public-safety purposes, including investigations involving missing or endangered persons, stolen vehicles, reckless driving and road-rage incidents, stalking or protective-order violations, thefts and burglaries, wanted persons, fraud and scams, officer-safety concerns, and traffic-related crimes.

Data Retention and Sharing

Sanibel currently retains its ALPR data for one year. The longer retention period reflects Sanibel's large seasonal population and the possibility that crimes may not be discovered until a property owner returns to the island months later.

SPD controls how its ALPR information is shared with other law enforcement agencies. Flock provides Statewide and National Lookup functions that allow authorized participating agencies to search participating ALPR networks for legitimate law-enforcement purposes. Federal agencies are excluded from those Statewide and National Lookup networks and do not have automatic or "back-door" access to Sanibel's data.

Flock has informed City staff that the company does not sell Sanibel's (or any agency's) ALPR data or operate as a data broker.

Access, Oversight, and Safeguards

Access to Sanibel's ALPR system is limited to authorized sworn SPD officers, dispatchers, and qualified City IT personnel who have completed required Florida Department of Law Enforcement training and certification. Each authorized user accesses the system through an individual account.

Flock records user activity and searches, including the user, date and time, scope of the search, search criteria, offense type, case number when available, vehicle filters, time period searched, and type of search performed. These records create an audit trail that allows the City to review the purpose and scope of system activity.

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City IT personnel audit ALPR access and activity records weekly and monthly. Irregularities are elevated to SPD command staff and the IT Director for review. Misuse may result in loss of access and disciplinary action.

Flock also announced additional privacy and accountability safeguards in August 2026, including automated misuse auditing, account lockouts for abnormal activity, case-code requirements for searches, additional controls over permissible search purposes, strengthened account security, and a recommended/default seven-day retention period. Staff will evaluate these changes as they become available and determine how they complement Sanibel's existing safeguards.

Responding to Resident Concerns

The FAQ included in the agenda packet was prepared in response to resident concerns presented to staff through City Councilmembers. Mayor Miller provided the document "Automated License Plate Readers on Sanibel Island". The referenced document is included in the agenda packet.

Public Information and Next Steps

Recent community questions regarding ALPR technology have focused on privacy, data access, information sharing, retention, and the capabilities of the broader Flock platform. In response, staff prepared a FAQ explaining the specific technology Sanibel uses, how SPD uses it, and the safeguards governing access to the system.

Staff and the City Attorney are also reviewing the existing 2022 MOU against Flock's current contractual terms. An updated agreement will be brought to City Council for consideration to ensure that the agreement accurately reflects Sanibel's current practices, data ownership and control, and appropriate privacy and accountability safeguards.

The City Council should discuss the issues at hand and provide direction to staff. I, along with the City Attorney, Police Chief, Deputy Police Chief, and IT Director will be prepared to answer questions.

FUNDING SOURCE: N/A

RECOMMENDED ACTION: Discussion and direction.