



City of Cambridge

Executive Department

YI-AN HUANG
City Manager

CMA 2025 #257
IN CITY COUNCIL
October 20, 2025

To the Honorable, the City Council:

I am writing in response to Awaiting Report Item Number 25-53, which requested that the City Manager consult with relevant departments about the implications of deploying automatic license plate readers (ALPRs) and provide recommendations as to whether adjustments in plans for deployment should be made in light of changes since approval in February.

Over the last six weeks the Police Department, Law Department, IT Department, and my office have had many meetings both internally and with Flock Safety to discuss the concerns raised with the deployment of ALPRs and how we can ensure the safety of all of our residents, at a point in time where collaboration between local governments and federal law enforcement has been severely strained.

Please see the attached response from CPD, outlining how the implementation framework is intended to protect our community and the further comprehensive review that we are currently conducting across several City departments, focusing on data privacy and security, community impact and transparency, police oversight and governance, and the contractual terms to align with our Welcoming Community Ordinance and values.

Very truly yours,

Yi-An Huang
City Manager





City of Cambridge Police Department

TELEPHONE
(617) 349-3300

WEB
www.cambridgepolice.org

FACEBOOK
facebook.com/CambridgePolice

TWITTER
twitter.com/CambridgePolice

Christine Elow
Police Commissioner

Yi-An Huang
City Manager

To: City Manager, Yi-An Huang
From: Police Commissioner, Christine Elow
Date: October 20, 2025
Ref.: AR #25-53

This memorandum has been prepared in response to Awaiting Report 2025 #53 which inquired into the implications of deploying license plate readers and provide recommendations as to whether adjustments in plans for deployment should be made considering changes since approval in February.

The Cambridge Police Department has reviewed the City Council's order regarding the deployment of Automatic License Plate Readers (ALPRs) and the potential implications considering recent federal immigration enforcement activity.

The Department is deeply committed to public safety, transparency, and maintaining the trust of our community. We fully recognize and share the City Council's concerns regarding data privacy, the misuse of surveillance technology, and the importance of ensuring Cambridge remains a welcoming and safe city for all residents—regardless of immigration status or other legally protected activities.

Although the technology was originally approved before the most recent updates to the City's Welcoming Ordinance, our ALPR policy was developed in alignment with those updated protections as well as with the Commonwealth's Shield Law. Our implementation framework was deliberately designed to ensure that ALPR technology is not used to support or assist in any immigration enforcement efforts or in investigations related to activities that are legally protected in Massachusetts, including reproductive or gender-affirming care.

The intended use of ALPR technology is solely for legitimate public safety purposes—such as locating stolen vehicles, investigating violent crimes, identifying vehicles connected to missing persons, and improving traffic safety.

A comprehensive review is currently underway with relevant City departments to assess the legal, operational, and community implications of ALPR deployment. This review will specifically focus on the following areas:

Data Privacy and Security

- Flock Group Inc. performs an annual SOC 2 Type 2 audit. The purpose of this audit is to ensure that the Flock Safety Solution System has the proper organizational and system controls in place and practices such controls to ensure relevant security, availability and confidentiality. This audit also verifies that employee access to sensitive systems and data is appropriately restricted and monitored in alignment with security best practices. In review of their most recent audit, which covers February 16, 2024, to February 15, 2025, there were no exceptions noted. The audit is conducted by Moss Adams, which is a reputable firm in the accounting industry.

- The Public Safety IT Team has deliberately not implemented single sign-on for the Flock Safety Solution System; by doing this the system is isolated from our network and facilitates limiting user access. It is also important to note that there are no data feeds to or from the Flock Safety Solution System for any of the systems in the public safety network.
- The City of Cambridge owns all data collected by the ALPR system. Section 4.1 of our contract (Customer Data) explicitly states that all data is retained solely by the City.
- Flock's role is limited to providing technical services. It has no ownership of or open access to Cambridge data. Any use of anonymized, non-identifiable information (Section 4.3) is limited to improving system functionality, such as identifying new vehicle models.
- The Cambridge Police Department does not share data with external agencies, including federal immigration enforcement, except when legally required through a subpoena or court order. Flock is required to notify the City if such a request is made.
- The Department has activated restrictive administrative settings that prohibit access to data related to immigration enforcement, gender-affirming care, and reproductive health care.
- Data may be shared only with the Office of the District Attorney for court-mandated discovery in criminal cases or through proper legal process (e.g., subpoena, warrant, or court order).
- Requests from external agencies (e.g., for a missing person, Amber or Silver Alert, or stolen vehicle) are reviewed on a case-by-case basis, with consideration of legal authority and community impact.

Community Impact and Transparency

- Quarterly audits will regularly assess data accuracy and policy compliance.
- Public transparency reports will summarize audit outcomes, including data access, sharing instances with the reason, and policy adherence.
- All ALPR data access is fully logged, with metadata tracking user identity, date, time, and purpose.
- The Department will host community information sessions and public forums to explain how the system works, how data is protected, and how privacy safeguards are enforced.

Policy Oversight and Governance

- The ALPR policy will be updated to reflect community feedback, changes in law, or evolving best practices.
- Access to ALPR data is strictly limited to authorized personnel with role-based permissions.
- All data is encrypted, stored securely, and automatically deleted after 30 days if not actively used in an authorized investigation. After 30 days, the data is not retrievable.

Contractual and Operational Review

- Law Dept -The City and Police Department are reviewing contractual terms with Flock to ensure continued alignment with the City's Welcoming Ordinance and community values.

The Cambridge Police Department appreciates the City Council's continued oversight and partnership in ensuring that public safety tools are deployed responsibly, ethically, and transparently. Our shared goal remains to enhance safety, protect victims, and uphold the privacy and rights of everyone in our community.

Respectfully,



Christine Elow
Police Commissioner