




Clayton County Police Department

PROCEDURES

Subject AUTOMATED LICENSE PLATE READERS			Procedure # D17
Authorizing Signature 	Effective 06-18-2025	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Rescinds	Total Pages 5

I. PURPOSE

To provide employees with guidelines on the proper use of Automated License Plate Readers (ALPRs) and Automated License Plate Recognition (ALPR) systems, management of ALPR data, and maintenance of ALPR equipment. Both Automated License Plate Readers (ALPRs) and Automated License Plate Recognition (ALPR) systems are often used interchangeably. They both refer to the same technology; systems that automatically capture and analyze license plate systems.

II. POLICY

Automated License Plate Readers (ALPRs) provide opportunities for enhanced productivity, effectiveness and officer safety. This policy is designed to provide guidance in the use of ALPRs and the retention, dissemination and disposition of the data they generate, while continuing to safeguard the right of privacy of the public. Employees of the Clayton County Police Department (CCPD) will use ALPRs and data captured from such device in accordance with procedures and guidelines set forth herein.

III. DEFINITIONS

Alert: An audible/signal activated upon the captured picture of a license plate that is associated with a Hotlist alert that has not been visually verified by an officer against the photo within the Flock system.

Automated License Plate Reader (ALPR): An electronic device that is capable of photographing a vehicle and/or its license plate identifying alphanumeric characters and comparing the collected data and photographs to existing law enforcement databases for investigative purposes.

Automated License Plate Reader (ALPR) Data: Digital data captured by a fixed or mobile ALPR in the form of an image (e.g., license plate or description of a vehicle on which it is displayed) within public view, and stored on the ALPR system.

Confirmed Hit: A hit by the Flock system that has been confirmed as valid and active by the original entering agency through NCIC/GCIC.

Detection: Data obtained by an ALPR of an image (e.g., license plate or vehicle) within public view that was read by the device, including potential images (e.g., license plate or description of a vehicle on which it was displayed) and information regarding the ALPR camera location at the time of the read.

Fixed (ALPR) System: ALPR cameras that are permanently affixed to a structure, such as a pole, a traffic barrier, a building or a bridge.

Flock: Automated License Plate Recognition (ALPR) system sold and maintained by Flock Safety.

Hot List: License plate numbers of stolen cars, vehicles owned by persons of interest, and vehicles associated with AMBER Alerts, Mattie's calls, Levi's calls and similar alerts that are regularly added to "hot lists" circulated among law enforcement agencies. Information can come from a variety of sources, including the National Crime Information Center (NCIC) database and the Georgia Crime Information Center (GCIC) database. In addition to lists provided by other sources, users may enter license plate numbers to hot lists in order to be alerted if and when a vehicle license plate of interest is read by the ALPR system.

Live Query Transaction: A hit by the Flock system that has been validated as active but has not been confirmed as valid by the entering agency.

Mobile (ALPR) System: ALPR cameras that are affixed, either permanently or temporarily to a law enforcement vehicle or trailer for mobile deployment.

Tentative Hit: An alert by the Flock system that has been visually verified by an officer and photo but has not been validated by an officer, dispatcher, or RTCC employee as a live query transaction or confirmed as valid with the original entering agency.

IV. PROCEDURES

A. Privacy Considerations

1. Employees will use ALPR systems, associated equipment and resulting data and imagery in conformance with applicable law and written directives. All ALPR systems and information must be used only for law enforcement purposes.
2. No unauthorized recording, viewing, reproduction, retention, or distribution of ALPR system data is allowed, except as authorized or required by law.
3. Employees who use ALPR systems, **will not**:
 - a. Intentionally maneuver cameras into areas with an expectation of privacy absent exigent circumstances, a search warrant, or the property owner's permission.
 - b. Absent exigent circumstances or a search warrant, monitor areas where the public has an increased expectation of privacy, e.g., private residence or public bathrooms.
 - c. Use data obtained and stored for anything other than legitimate law enforcement purposes.
4. Employees who misuse ALPR systems, equipment, databases or data will be subject to disciplinary action.
5. The Department's ALPR systems, associated equipment, databases and data are the property of the CCPD and intended for use in conducting official business.

B. Responsibility

1. Unless otherwise directed by the Chief of Police, or authorized designee, the Real-Time Crime Center (RTCC) Commander will be the Department's Administrator of the ALPR system.
2. The Real-Time Crime Center (RTCC) Commander, or authorized designee (hereinafter referred to as the RTCC Commander), will be responsible for the deployment and operations of all ALPR systems and shall:
 - a. Establish and maintain protocols for access, collection, storage and retention of ALPR data and associated media files;
 - b. Establish and maintain protocols to preserve and document ALPR reads and "alerts" or "hits" that are acted on in the field or associated with investigations or prosecutions;
 - c. Establish and maintain protocols to ensure the security and integrity of data captured, stored, and/or retained by the ALPR system;

- d. Establish and maintain protocols for adding license plates to the hot list;
 - e. Establish and maintain protocols to document ALPR usage and results, including appropriate documentation of all incidents, arrests, and property recoveries related to ALPR usage; and
 - f. Authorize non-traditional requests for ALPR system use or data access according to the policies and guidelines of the Department.
- 3. ALPR system repairs, hardware or software, shall be made only by authorized vendors or employees authorized by the RTCC Commander.
 - 4. The RTCC Commander shall maintain a complete inventory of ALPRs which shall include location and assignment.

C. Use of the Department's Automated License Plate Reader (ALPR) System

- 1. Personnel will exercise due care and caution when utilizing the ALPR system and while operating a vehicle.
- 2. An ALPR may be used in conjunction with any routine patrol operation or criminal investigation. Reasonable suspicion or probable cause is not required prior to using an ALPR or accessing ALPR data.
- 3. Partial license plates and unique vehicle descriptions reported during major crimes should be entered into the ALPR system in an attempt to identify suspect vehicles.
- 4. A valid reason and case number shall always be provided when conducting a search or query within the ALPR system.
- 5. Automated License Plate Reader (ALPR) Alerts/Hits

Prior to the initiation of a traffic stop based on an ALPR alert or hit, the officer must:

- a. Visually verify that the vehicle plate of interest matches identically with the image of the license plate captured (read) by the ALPR system, including both alphanumeric characters of the license plate, state of issuance, and vehicle descriptors.
- b. Verify the current status of the license plate via a Live Query through the E911/ Communications Center dispatcher or the Mobile Communications Terminal (MCT), when circumstances allow.
- c. In cases of Be on the Lookout (BOLO) situations, officers shall make reasonable efforts to verify that the driver and/or occupants physically match the description of any person(s) listed on the hit.

The aforementioned information **shall not** prevent an officer from taking immediate action when a verifiable emergency situation exists for the sake of officer safety.

- 6. If an ALPR alert cannot be confirmed, the alert will be rejected.

7. Automated License Plate Reader (ALPR) Hotlists

Officers and detectives who are properly trained may enter the license plate of a vehicle of interest into Flock for law enforcement purposes only. When creating a hotlist, the entering officer must include the following:

- a. License plate number and state of issuance, and
- b. Case number.
- c. Reason field, which should contain information supporting the alert entry; any cautions that would assist an officer receiving the alert; contact information for the Department or the entering officer's name; and requested action (such as stop & field interview, monitor only, or notify a specific officer/detective).

- d. Hotlist requests from other law enforcement agencies shall include the agency name, a valid case number from that agency, and the requesting officer's name.
- e. Hotlist entries should use an expiration date of no more than thirty (30) days unless the type of crime and officer safety requires a longer expiration period. All hotlist entries with no expiration shall be approved by a supervisor prior to entry and must be verified as still valid monthly by the entering officer.
- f. If a vehicle on a hotlist, created by the CCPD, is located by an officer and no longer needs to be included on the hotlist, it is the responsibility of the locating officer to have the located vehicle removed from the hotlist and notify the user that created the entry. The outcome notification should include the case number that references the details of the stop, any arrests, the disposition, and any additional information that may be pertinent to an investigation.

D. Installation of Fixed/Mobile Automated License Plate Reader (ALPR) Cameras

- 1. The RTCC Commander will be responsible for coordinating the installation, implementation, and maintenance of ALPRs.
- 2. All new fixed ALPR cameras shall be installed by Flock or their representative upon approval and proper permitting.
- 3. The ALPR **will not** be transferred to another vehicle by anyone, except with the approval of the RTCC Commander.

E. Automated License Plate Reader (ALPR) Care of Equipment and Maintenance

- 1. All ALPRs must be properly maintained in accordance with the manufacturer's recommendations as detailed in the training provided prior to use.
- 2. Maintenance and all repairs of Flock ALPR equipment will be coordinated by the RTCC Commander.
- 3. It is the responsibility of any employee utilizing the ALPR system to notify their immediate supervisor and the RTCC Commander of any damage, repairs, or issues that arise with the ALPR system.
- 4. Should a Flock ALPR camera become damaged, and/or destroyed, an *Incident Report* and/or *Accident Report* should be completed and a copy of such report(s) provided to the RTCC Commander.
- 5. Officers **shall not** attempt to modify, adjust, or repair Flock ALPR equipment or software.

F. Training

- 1. Personnel will be trained in the use of the ALPR system and the associated equipment prior to accessing system information.
- 2. Officers using the ALPR system for searches or creation of hotlists, shall complete the Flock search tool and Alerts certification courses prior to accessing the system.
- 3. E911/Communications Center personnel shall complete the Flock dispatch certification course prior to accessing the system.

G. Automated License Plate Reader (ALPR) Data Collection and Record Retention

- 1. The Flock ALPR database resides on a secure server that is owned and operated by the vendor Flock Safety. The collected data remains property of the Department and is managed according to the agency data sharing and retention policies. The collected data contains no Personally Identifiable Information (PII) that may be used to connect a license plate detection to an individual. It is only with permissible purpose that an officer may make a connection

(using other systems) and this access is governed by the Federal Driver's Privacy Protection Act (DPPA).

2. Information gathered or collected, and records retained by Flock Safety cameras or any other CCPD ALPR system **will not** be sold, accessed, or used for any purpose other than legitimate law enforcement or public safety purposes.
3. Flock Safety will store the data and ensure proper maintenance and security of the data stored. Flock Safety will purge the data after thirty (30) days.
4. All ALPR data used in conjunction with an open, ongoing law enforcement investigation shall be considered evidence and must be properly documented and preserved in accordance with CCPD SOP: *E3: Evidence & Property Control*.
5. Pursuant to O.C.G.A. §35-1-22(f), captured ALPR data **shall not** be subject to public disclosure under the Georgia Open Records Act.

H. Accountability and Safeguards

1. Data should only be utilized to conduct further investigation in an open criminal investigation or intelligence into illegal activity.
2. Flock user audits will be produced and inspected monthly by supervision to ensure their subordinates who access Flock are following this policy. Any misuse shall be reported immediately to the Sector/Unit Commander and RTCC Commander.
3. The RTCC Commander will be responsible for conducting a quarterly agency audit to ensure compliance.

I. Privately-Owned/Funded Automated License Plate Reader (ALPR) Systems

1. The Department recognizes that residents may wish to purchase privately owned Flock Safety cameras and link them with the CCPD network.
2. All privately owned systems must be approved by the Chief of Police, or authorized designee, prior to linking the system with the CCPD network.
3. All data received by the Department shall become CCPD data and subject to all provisions and applicable laws.
4. The Department must be provided search capabilities to any linked ALPR systems.
5. The Department **shall not** be responsible for any costs associated with a privately funded ALPR system, and **will not** actively monitor any privately-owned ALPR or video system.

J. State Road and Tollway Authority (SRTA)

1. The SRTA is a state-level, independent Authority created by the Georgia General Assembly to operate tolled transportation facilities within Georgia and act as the transportation financing arm for the State.
2. SRTA manages the collection of tolls on Georgia's Express Lanes System through the use of Peach Pass, the state's all-electronic tolling technology. The Georgia SRTA shall store and maintain SRTA ALPR data.

V. CANCELLATION

This procedure amends and supersedes the following standard operating procedure: *License Plate Reader (LPR)*, dated March 2, 2023.