




Clayton County Police Department PROCEDURES

Subject AUTOMATED LICENSE PLATE READERS		Procedure # D17	
Authorizing Signature 	Effective 06-08-2026	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Rescinds	Total Pages 6

I. PURPOSE

The purpose of this policy is to establish guidelines for the proper use of Automated License Plate Readers (ALPRs) and Automated License Plate Recognition (ALPR) systems, including data management and equipment maintenance. These terms are used interchangeably to refer to technology that automatically captures and analyzes license plate information.

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) shall use ALPRs and data captured from such devices in accordance with procedures and guidelines set forth herein.

III. DEFINITIONS

Alert: An audible or visual signal activated by the Flock system when a license plate associated with a hot list record is captured, and the match has not yet been verified by an officer against the image.

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 Flock system alert validated as an active record by the originating agency through the National Crime Information Center (NCIC) or the Georgia Crime Information Center (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: A database containing 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, which are regularly circulated among law enforcement agencies. Information can come from a variety of sources, including the National Crime Information Center (NCIC) and the Georgia Crime Information Center (GCIC) databases. In addition to these, users may enter specific license plate numbers to be alerted if and when a vehicle 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: A Flock system alert that has been visually verified by an officer against the photo, but not yet validated as a live query transaction or confirmed as valid by the originating agency.

IV. PROCEDURES

A. Privacy Considerations

1. Employees shall 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, shall 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 shall 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 shall 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), shall be responsible for the deployment and operations of all ALPR systems and must establish and maintain protocols:
 - a. To govern the access, collection, storage, and retention of ALPR data and associated media files;
 - b. To preserve and document ALPR "reads," "alerts," or "hits" that are acted on in the field or associated with investigations or prosecutions;
 - c. To ensure the security and integrity of data captured, stored, and/or retained by the ALPR system;
 - d. To authorize the adding license plates to the hot list;
 - e. To document ALPR usage and results, including appropriate documentation of all incidents, arrests, and property recoveries related to ALPR usage; and

- f. To 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, including location and assignment.
- C. Use of the Department's Automated License Plate Reader (ALPR) System
1. Personnel shall 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 shall 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. In the absence of a case number, the CAD event ID number shall be used.
 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 the image of the license plate captured by the ALPR system, including alphanumeric characters, 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 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 provisions 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) Hot Lists
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 hot list, the entering officer must include the following:
 - a. The license plate number and state of issuance;
 - b. The associated case number; and
 - c. A "Reason" field containing information supporting the entry; cautions to assist the receiving officer; contact information for the Department or the entering officer; and the requested action (e.g., stop and field interview, monitor only, or notify a specific officer).
 - d. Requests from other law enforcement agencies must include the agency name, a valid case number from that agency, and the requesting officer's name.

- e. Entries shall use an expiration date of no more than thirty (30) days, unless the crime type or officer safety requires a longer period. Any entry without an expiration must be approved by a supervisor and verified monthly by the entering officer.
 - f. If a vehicle on a CCPD-created hot list is located and no longer requires monitoring, the locating officer is responsible for removing the vehicle from the list and notifying the original creator. This notification must include the case number, stop details, arrests, disposition, and any other pertinent investigative information.
- D. Use of Automated License Plate Reader (ALPR) System for Administrative Investigations
- 1. ALPR data may be accessed and used during internal investigations in accordance with CCPD SOP *E1: Internal Affairs Investigations*.
 - 2. Prior approval from the Chief of Police, Assistant Chief, Deputy Chief, or Office of Professional Standards (OPS) Commander is required before accessing any ALPR data for administrative investigations.
 - 3. All requests to use ALPR data during an internal investigation shall be made in writing and shall contain the following:
 - a. Identify the employee under investigation.
 - b. State the specific administrative purpose or allegation.
 - c. Define the scope and timeframe of the requested data.
- E. Installation of Fixed/Mobile Automated License Plate Reader (ALPR) Cameras
- 1. The RTCC Commander shall 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 shall not be transferred to another vehicle by anyone, except with the approval of the RTCC Commander.
- F. Automated License Plate Reader (ALPR) Care of Equipment and Maintenance
- 1. All ALPR equipment must be properly maintained in accordance with the manufacturer's recommendations, as detailed in the Department training received prior to use.
 - 2. Maintenance and all repairs of Flock ALPR equipment shall 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 equipment damage, required repairs, or operational issues that arise with the ALPR system.
 - 4. If a Flock ALPR camera is damaged or destroyed, the involved employee must complete an *Incident Report* or *Accident Report* and provide a copy of the report to the RTCC Commander.
 - 5. Officers shall not attempt to modify, adjust, or repair Flock ALPR equipment or software.
- G. 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 hot lists, 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.

H. 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 link a license plate detection to a specific individual. Access to make such a connection (using other systems) is restricted to permissible purposes and is governed by the Federal Driver's Privacy Protection Act (DPPA).
2. Information gathered, collected, or retained by Flock Safety cameras or any other CCPD ALPR system shall not be sold, accessed, or used for any purpose other than legitimate law enforcement or public safety objectives.
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.

I. Accountability and Safeguards

1. Data shall be used to conduct further investigation in an open criminal investigation or to support intelligence gathering regarding illegal activity.
2. Flock user audits shall be produced and inspected monthly by supervisors to ensure that subordinates with access to Flock are following this policy. Any misuse shall be reported immediately to the Sector/Unit Commander and the RTCC Commander.
3. The RTCC Commander shall be responsible for conducting a quarterly agency audits to ensure compliance.

J. 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 for 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.

K. State Road and Tollway Authority (SRTA)

1. SRTA is a state-level, independent authority created by the Georgia General Assembly to operate tolled transportation facilities and serve as the state's transportation financing arm.
2. SRTA manages toll collection on Georgia's Express Lanes System via Peach Pass, the state's all-electronic tolling technology. To ensure system integrity, SRTA maintains and stores ALPR data as required by law.

L. Disciplinary Action

All investigations regarding alleged Automated License Plate Reader (ALPR) procedure violations shall be investigated in accordance with CCPD SOP *E1: Internal Affairs Investigations*.

1. Any Employee who intentionally or negligently misuses the ALPR system in violation of this procedure may be subject to disciplinary action, up to and including termination.
2. Employees who knowingly requests, uses, obtains or attempts to obtain ALPR data for any purpose other than a law enforcement purpose may be subject to criminal action.

V. CANCELLATION

This procedure amends and supersedes the following standard operating procedure: *License Plate Reader (LPR)*, dated June 18, 2025.