

OFFICE OF SHERIFF CULLMAN COUNTY, ALABAMA	NUMBER: GENERAL ORDER # 34
	RECINDS:
SUBJECT: LICENSE PLATE READER (LPR)	
EFFECTIVE: 01/14/2025	
REVISED:	

I. PURPOSE

The purpose of this Policy is to provide staff with guidelines on the proper use of the license plate recognition (LPR) system, also commonly known as license plate reader systems.

The objectives of the LPR are to deter criminal behavior, and, in certain circumstances, to use recorded footage or photos in the investigation of and prosecution for criminal activity, by strategic placement of the LPR systems.

The Cullman County Sheriff's Office desires to ensure that the use of the LPR within the County conforms to constitutional principles.

LPR use must be balanced with the need to protect residents' constitutional rights, including, among others, privacy and anonymity, freedom of speech and association, government accountability, and equal protection.

The Cullman County Sheriff's Office recognizes that it is in the best interest of our citizens to cooperate with homeowner associations (HOAs), businesses, and others in operating LPR camera systems. This Policy helps establish guidelines for sharing/partnering systems with HOAs, businesses, and others within Cullman County.

II. POLICY

The availability and use of LPR systems have provided many opportunities for the enhancement of productivity, effectiveness, and officer safety. It is the Policy of this agency that all members abide by the guidelines set forth herein when using this technology, while maintaining compliance with applicable state and federal laws.

III. DEFINITIONS

FOUO - For Official Use Only

LPR - License Plate Recognition/License Plate Reader

OCR - Optical Character Recognition

Appending Data - using technology to attach personally identifiable information, such as name, address, or criminal history, to footage or other records of the LPR Camera System such that those subsequently accessing the footage or records can also access the attached personal information.

Read - Digital images of license plates and vehicles and associated metadata (e.g., date, time, and geographic coordinates associated with the vehicle image capture) that are captured by the LPR system.

Alert - A visual and/or auditory notice that is triggered when the LPR system receives a potential "hit" on a license plate.

Hit - A read matched to a plate that has previously been registered on an agency's "hot list" of vehicle plates related to stolen vehicles, wanted vehicles, or other factors supporting investigation, or which has been manually registered by a user for further investigation.

Hot list - License plate numbers of stolen cars, vehicles owned by persons of interest, and vehicles associated with AMBER Alerts that are regularly added to "hot lists" circulated among law enforcement agencies. Hot list information can come from a variety of sources, including stolen vehicle information from the National Insurance Crime Bureau and the National Crime Information Center (NCIC), as well as national AMBER Alerts and Department of Homeland Security watch lists. Departments of motor vehicles can provide lists of expired registration tags, and law enforcement agencies can interface their own, locally compiled hot lists to the LPR system. These lists serve an officer safety function as well as an investigatory purpose. In addition to agency supported hot lists, users may also manually add license plate numbers to hot lists in order to be alerted if and when a vehicle license plate of interest is "read" by the LPR system.

Fixed LPR system - LPR cameras that are permanently affixed to a structure, such as a pole, traffic barrier, or a bridge.

IV. PROCEDURE

A. General

1. The use of LPR systems is restricted to public safety related missions of this agency.
2. LPR systems and associated equipment and databases are authorized for official public safety purposes. Misuse of this equipment and associated databases, or data, may be subject to sanctions and/or disciplinary actions.
3. LPR systems, LPR data, and associated media are the property of this agency and intended for use in conducting official business.
4. Any Publicly/Privatey Owned LPR Camera System that stores data on Cullman County Sheriff's Office databases must be according to the specifications, policies and guidelines of this agency.

B. Administration

1. The Sheriff/designee shall designate an employee(s) with administrative oversight (The Administrator) for LPR system deployment and operations that is responsible for the following:
 - a. Establishing protocols for access, collection, storage, and retention of LPR data and associated media files.

- b. Establishing protocols to preserve and document LPR reads and "alerts" or "hits" that are acted on in the field or associated with investigations or prosecutions.
 - c. Establishing protocols to establish and ensure the security and integrity of data captured, stored, and/or retained by the LPR system.
 - d. Maintaining records identifying approved LPR deployments and documenting their results, including appropriate documentation of significant incidents and arrests that are related to its usage.
 - e. Authorizing any requests for LPR systems use or data access according to the policies and guidelines of this agency.
- 2. Designated personnel shall check equipment on a regular basis to ensure functionality and camera alignment. Any equipment that falls outside expected functionality shall be reported immediately to Flock Safety.
 - 3. LPR systems repairs, hardware or software, shall be made by technicians through Flock Safety.

C. Fixed LPR Systems Usage

- 1. Fixed LPR is a passive system, and live data is not viewed.
- 2. Fixed LPR systems shall monitor all license plates that come in contact with the LPR camera.
- 3. Fixed LPR system searches of historical data are made in the LPR system by those members of staff with access and can only be done for legitimate public safety related purposes. A log of such requests will be maintained by the system.
- 4. Fixed LPR systems may have the ability to notify the System Administrator and/or other police personnel of a HIT from the LPR system Hot List.
- 5. If notification of a HIT is made, the process for verifying the HIT shall be the same as for the mobile LPR systems.

E. LPR Data Sharing and Dissemination

LPR data should be considered FOUO and can only be shared for legitimate law enforcement purposes:

- 1. When LPR data are disseminated outside the agency, it should be documented in a secondary dissemination log.
- 2. Outside law enforcement can make requests for specific queries of the LPR database for legitimate law enforcement purposes. Only matching returns will be shared with the agency.
- 3. Information sharing among agencies should be dictated in accordance with MOUs (memoranda of understanding) or established agency policies.
- 4. The sharing of the LPR database with outside law enforcement agencies or other government agencies is prohibited except to the degree required by law.

5. Sharing of LPR data and information to third parties, including private litigants, is prohibited except to the degree required by law.
- F. Retention of LPR related photos and data
1. LPR related data will be stored for a maximum of **30 days**.
 2. LPR data that is deemed evidence in a police related case will be transferred to and retained in the agency's digital evidence storage system.
- G. Business, HOA, and Other Partnerships
1. Business entities, HOAs, and others partners:
 - a. Must purchase and install their own LPR technology.
 - b. May provide inquiry/view access to the Cullman County Sheriff's Office.

Matt Gentry

Matt Gentry, Sheriff

01/14/2025

DATE

