

City of Woonsocket Rhode Island



October 5, A.D. 2026

Ordinance Chapter

AN ORDINANCE REGULATING THE USE OF AUTOMATED LICENSE PLATE RECOGNITION TECHNOLOGY (ALPR) IN THE CITY OF WOONSOCKET

WHEREAS, Automated License Plate Recognition technology (ALPR) is being used by law enforcement agencies in numerous Rhode Island municipalities, including the Woonsocket Police Department ("WPD"), by the Rhode Island State Police as well as agencies across the country; and,

WHEREAS, the ALPR technology allows for the automated detection of license plates along with the vehicle make, model, color and unique identifiers through the WPD's ALPR system and the vendor's vehicle identification technology. The technology is used by the WPD to convert data associated with vehicle license plates and vehicle descriptions for official law enforcement purposes. This includes identifying stolen or wanted vehicles, stolen license plates and missing persons. It may also be used to gather information related to active warrants, homeland security, electronic surveillance, suspect interdiction, stolen property recovery and active criminal investigations; and,

WHEREAS, in its use of the ALPR technology, the WPD have implemented policies and procedures that protects the privacy rights of the public as well as guards against any misuse by individuals. All data and images gathered by the ALPR Systems are for the official use of the WPD. Because such data may contain confidential information, it is not open to public review.

**NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL
OF THE CITY OF WOONSOCKET, RHODE ISLAND, AS FOLLOWS:**

Section 1. That Chapter II of the Woonsocket City Code entitled "Administration" is hereby amended through the creation of new Article X entitled "Regulation of ALPR Systems" as follows with deletions in ~~red-strikethrough~~ and insertions in underlined italics:

Sec. 2-163. Definitions

Automated License Plate Reader (ALPR): A device that uses cameras and computer technology to compare digital images to lists of known information of interest.

Administrative Immigration-Related Investigation: A civil or non-criminal inquiry or enforcement action conducted to identify, locate, detain, or remove an individual based solely on actual or suspected immigration status, including actions undertaken by U.S. Immigration and Customs Enforcement (ICE) or officers designated under 8 U.S.C. § 287(g).

ALPR Operator: Trained Department members who may utilize ALPR system/equipment. ALPR operators may be assigned to any position within the Department, and the ALPR Administrator may order the deployment of the ALPR systems for use in various efforts.

ALPR Administrator: The Chief of Police or his designee, serves as the ALPR Administrator for the Department.

Audit: A documented review of ALPR access logs, searches, hot list activity, and data dissemination conducted to ensure compliance with this policy, training requirements and applicable law.

Hot List: A list of license plates associated with vehicles of interest compiled from one or more data bases including, but not limited to, NCIC, RI DMV, Local BOLO's, etc.

MDT: Mobile Data Terminal, laptop, or tablet used in the field. The MDT's are mounted inside the police cruisers.

Unauthorized Use: Any access, query, analysis, dissemination, or use of ALPR data inconsistent with this policy, department training, or applicable law.

Vehicles of Interest: Including but not limited to vehicles which are reported as stolen; display stolen license plates or tags; vehicles linked to missing and/or wanted persons and vehicles flagged by the Department of Motor Vehicle Administration or law enforcement agencies.

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

Search: An intentional query performed by law enforcement officers or authorized users within Flock's database to find specific evidence or vehicle history.

Hit: Alert from the ALPR system that a scanned license plate number may be in the National Crime Information Center (NCIC) or other law enforcement database for a specific reason including, but not limited to, being related to a stolen car, wanted person, missing person, domestic violation protective order or terrorist-related activity.

Sec. 2-164. PROCEDURES

A. ALPR Administrators

The WPD Division Commanders shall be responsible for compliance with the following:

- 1. Only sworn officers and police dispatchers are allowed access to the ALPR system or to collect ALPR information, after receiving department-approved training.*
- 2. Ensuring that training requirements are completed for authorized users.*
- 3. ALPR system monitoring to ensure the security of the information and compliance with applicable privacy laws.*
- 4. Maintaining the title and name of the current designee overseeing the ALPR operation.*

5. Continually working with the BCI Unit on the retention and destruction of ALPR data.
6. Ensuring this policy, related procedures, and the transparency portal are conspicuously posted on the department's website.

B. ALPR USE

Use of an ALPR is restricted to the purposes outlined below:

1. Department members shall not use or allow others to use the equipment or database records for any unauthorized purpose.
2. An ALPR shall only be used for official law enforcement business.
3. An ALPR may be used in conjunction with any routine patrol operation or criminal investigation; reasonable suspicion or probable cause is not required before using an ALPR.
4. Partial license plates and unique vehicle descriptions reported during major crimes should be entered into the ALPR system to identify suspect vehicles.
5. If practicable, the officer should verify an ALPR response through the Rhode Island Law Enforcement Telecommunications System (RILETS) before taking enforcement action that is based solely on an ALPR alert. Once an alert is received, the operator should confirm that the observed license plate from the system matches the license plate of the observed vehicle before any law enforcement action is taken because of an ALPR alert, the alert will be verified through a RILETS inquiry via MDT or through Dispatch. Officers will not take any police action that restricts the freedom of any individual based solely on an ALPR alert unless it has been validated. Because the ALPR alert may relate to a vehicle and may not relate to the person operating the vehicle, officers are reminded that they need to have reasonable suspicion and/or probable cause to make an enforcement stop of any vehicle. (For example, if a vehicle is entered into the system because of its association with a wanted individual, officers should attempt to visually match the driver to the description of the wanted subject prior to making the stop or should have another legal basis for making the stop.)
6. Designation of hot lists to be utilized by the ALPR system shall be made by the Chief of Police or designee. Hot lists shall be obtained or compiled from sources consistent with the purposes of the ALPR system set forth in this policy. Hot lists utilized by the department's ALPR system may be updated by agency sources more frequently than the department may be uploading them and thus the department's ALPR system will not have access to real time data. Occasionally, there may be errors in the ALPR system's reading of a license plate. Therefore, an alert alone shall not be a basis for police action (other than following the vehicle of interest). Prior to initiation of a stop of a vehicle or other intervention based on an alert, officers shall undertake the following:
 - a. An officer must receive confirmation, from Communications Center or other department computer device, that the license plate is still stolen, wanted, or otherwise of interest before proceeding (absent exigent circumstances).
 - b. Officers shall visually verify that the license plate of interest matches identically with the image of the license plate number captured (read) by the ALPR, including both the alphanumeric characters of the license plate, state of issue, and vehicle descriptors before proceeding. Officers alerted to the fact that an observed motor vehicle's license plate is entered as a Hot Plate (hit) in a specific BOLO (be on the lookout) list are required to make a reasonable effort to confirm that a wanted person is in the vehicle and/or that a reasonable basis exists before an officer would have a lawful basis to stop the vehicle.
 - c. Officers will clear all stops from hot list alerts by indicating the positive ALPR Hit, i.e., with an arrest or other enforcement action. If it is not obvious in the text of the call as to the correlation of the ALPR Hit

and the arrest, then the officer shall update with the Communications Center personnel and original person inputting the vehicle in the hot list (hit).

d. General Hot Lists will be automatically downloaded into the ALPR system at a minimum of once a day with the most current data overwriting the old data.

e. All entries and updates of specific Hot Lists within the ALPR system will be documented by the requesting department member within the appropriate general offense report. As such, specific Hot Lists shall be approved by the ALPR Administrators or designee before initial entry within the ALPR system. The updating of such a list within the ALPR system shall thereafter be accomplished pursuant to the approval of the department member's immediate supervisor. The hits from these data sources should be viewed as informational; created solely to bring the officers attention to specific vehicles that have been associated with criminal activity.

f. All Hot Plates and suspect information entered the ALPR system will contain the following information at a minimum:

- 1) Entering department member's name;
- 2) Related case number; and
- 3) Short synopsis describing the nature of the originating call.

7. No member of this department shall operate ALPR equipment or access ALPR data without first completing department-approved training.

8. To ensure proper operation and facilitate oversight of the ALPR system, all users will be required to have individual credentials for access and use of the systems and/or data, which can be fully audited.

C. Communications

The Communications Center shall be responsible for monitoring the ALPR system. All hits received will sound an alert in the Communications Center. Upon receiving an alert, on-duty dispatch personnel will immediately verify the captured plate (photo) with the wanted/suspect plate number displayed as the wanted plate from either NCIC, RILETS or the department Hotlist. Upon visual verification of the plate/tag the dispatcher will manually verify the wanted plate with NCIC to determine if it is still outstanding as wanted.

1. Verified RILETS/NCIC hits will result in an immediate dispatch of the beat officer as a priority call.

a. Stolen License Plates – On all stolen license plate hits, dispatch personnel will check the stolen plate through DMV records. Should the stolen plate come back to a vehicle with the same make, model, and color of the vehicle that the stolen plate is currently being displayed on, the dispatched units shall be immediately advised of that fact. Officers should be advised that the plate may be the secondary license plate and not stolen.

2. Hotlist Alerts may include specific instructions to field personnel. Those instructions will also be relayed to on - duty personnel at the time of dispatch. i.e., “stop only with probable cause and ID occupants.”

3. Communications personnel shall be responsible for notification of the NCIC/RILETS information submitting jurisdiction of the recovery of wanted stolen vehicles and the status of any arrests. Notification shall be as per NCIC/RILETS protocols.

D. Patrol

Patrol Officers shall be responsible for monitoring ALPR cameras on their assigned beat. All patrol officers are encouraged to log into the Flock software on the Mobile Data Terminals, to monitor said activity. Upon receipt of an ALPR

notification, on duty personnel will respond to the area of the capture and look for the suspect vehicle. If the vehicle is located, proper traffic stop procedures shall be followed based upon the type of hit, officer observations and other factors present. The first officer identifying the wanted vehicle should wait for appropriate back-up before initiating a traffic stop or engaging the vehicle. Felony stops if conducted, will be in accordance with WPD General Order 330.01 Traffic Enforcement. Prior to taking any police action, patrol officers shall confirm the Flock hit with the communications center dispatchers.

E. Detective Responsibilities

1. Detective personnel shall utilize ALPR data to assist in the identification of suspects involved in criminal activity in the City of Woonsocket.
2. Detective personnel shall have search access enabling them to search the database for vehicles and/or persons of interest.
3. When Detective personnel utilize ALPR data to assist in identification of a suspect or vehicle linked to criminal activity, the ALPR data shall be downloaded from the system and attached to the investigative report as evidence.

F. Permitted/Impermissible Uses

The ALPR system, and all data collected, is the property of the Woonsocket Police Department. Department personnel may only access and use the ALPR system for official and legitimate law enforcement purposes consistent with this policy. The following uses of the ALPR system are specifically prohibited:

1. **Invasion of Privacy:** Except when done pursuant to a court order such as a search warrant, it is a violation of this policy to utilize the ALPR to record license plates except those of vehicles that are exposed to public view (e.g., vehicles on a public road or street, or that are on private property but whose license plate(s) are visible from a public road, street, or a place to which members of the public have access, such as the parking lot of a shop or other business establishment).
2. **Harassment or Intimidation:** It is a violation of this policy to use the ALPR system to harass and/or intimidate any individual or group.
3. **Use Based on a Protected Characteristic:** It is a violation of this policy to use the ALPR system or associated scan files or hot lists solely because of a person's, or group's race, gender, religion, political affiliation, nationality, ethnicity, sexual orientation, disability, or other classification protected by law.
4. **Personal Use:** It is a violation of this policy to use the ALPR system or associated scan files or hot lists for any personal purpose.
5. **First Amendment Rights:** It is a violation of this policy to use the ALPR system or associated scan files or hot lists for the purpose or known effect of infringing upon First Amendment rights.
6. Anyone who engages in an impermissible use of the ALPR system or associated scan files, or hot lists may be subject to criminal prosecution, civil liability, and/or administrative sanctions pursuant to and consistent with the collective bargaining agreement and department policies.

G. Data Collection and Retention

1. The WPD Operations Captain along with Unit Officers-in-Charge (OIC's) are responsible for ensuring systems and processes are in place for the proper collection and retention of ALPR data. In addition, that their subordinates' use of the ALPR software meets the standards within this policy. Data will be transferred from vehicles to the designated storage in accordance with department procedures.
2. All ALPR data downloaded to the server should be stored for no longer than thirty (30) days and in accordance with the established Rhode Island Records Retention Schedule (LG6). Thereafter, ALPR data should be purged

unless it has become, or it is reasonable to believe it will become, evidence in a criminal or civil action or is subject to a discovery request or other lawful action to produce records. In those circumstances the applicable data should be downloaded from the server onto portable media and logged into evidence in accordance with department policy. Refer to WPD General Order 420.01 Evidence Collection and Preservation.

3. ALPR vendor, Flock Safety, will store the data (data hosting) and ensure proper maintenance and security of data stored in their data towers. Flock Safety will purge their data at the end of the 30 days of storage. However, this will not preclude Woonsocket Police Department from maintaining any relevant vehicle data obtained from the system after that period pursuant to the established City of Woonsocket retention schedule mentioned above or outlined elsewhere.

4. Information gathered or collected, and records retained by Flock Safety cameras or any other CPD ALPR system will not be sold, accessed, or used for any purpose other than legitimate law enforcement or public safety purposes.

H. Accountability and Safeguards

All data will be closely safeguarded and protected by both procedural and technological means. The Woonsocket Police Department will observe the following safeguards regarding access to and use of stored data:

1. All non-law enforcement requests for access to stored ALPR data shall be processed in accordance with applicable law.

2. All ALPR data downloaded to a mobile device, computer or MDT shall be accessible only through a login/password-protected system capable of documenting all access of information by name, date, and time.

3. Persons approved to access ALPR data under these guidelines are permitted to access the data for legitimate law enforcement purposes only, such as when the data relates to a specific criminal investigation or department-related civil or administrative action.

4. ALPR data may be released to other authorized and verified law enforcement officials and agencies for legitimate law enforcement purposes.

5. Every ALPR Detection Browsing Inquiry must be documented by either the associated Woonsocket Police case number or incident number, and/or a reason for the inquiry.

6. For records retention and security, refer to WPD General Order 410.01 Records.

7. For records release, refer to WPD General Order 520.01 Release of Information and Media Relations.

8. The Woonsocket Police Department will create a transparency portal available to the public which will outline the ALPR policy and metrics of the system to include:

- a. Hot List sources;
- b. Data retention;
- c. Number of operational cameras;
- d. Organizations with access to cameras;
- e. Number of total plate-reads in a 30-day period; and
- f. Number of searches in a 30-day period.

I. ALPR Data Detection Browsing Audits

1. It is the responsibility of the Office of Professional Standards (OPS) or the Chief of Police's designee to ensure that an audit is conducted of ALPR detection browsing inquiries at least once per month. The department will audit a sampling of the ALPR system utilization from the prior period to verify proper use in accordance with the above authorized uses. The audit shall randomly select 10 percent (10%) or no-less than twenty five (25), (whichever is greater) searches conducted by department employees during

the preceding period and determine if each inquiry meets the requirements established within this policy.

2. The audit shall be documented in the form of an administrative review, which shall be forwarded to the Chief of Police. The memorandum shall include any data errors found so that such errors can be corrected. After review by the Chief of Police or designee, the memorandum and any associated documentation shall be filed and retained by the Office of Professional Standards.

J. Releasing ALPR Data

1. The ALPR data may be shared only with other law enforcement or prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law. The agency makes a written request for the ALPR data that includes:

- a. The name of the agency;
- b. The name of the person requesting; and
- c. The intended purpose of obtaining the information.

2. The request is reviewed by the Chief of Police or the authorized designee and approved before the request is fulfilled.

3. Woonsocket Police Department does not permit the sharing of ALPR data gathered by the city or its contractors/subcontractors for purpose of any civil or non-criminal inquiry, such as an administrative immigration-related investigation. These federal immigration agencies include Immigrations and Customs Enforcement (ICE) and Customs and Border Patrol (CPB).

4. The approved request is retained on file. Requests for ALPR data by non-law enforcement or non-prosecutorial agencies will not be processed.

K. Public Complaints and Misuse

Any member of the public who believes their information was accessed or used improperly, may file a complaint with the department, which will be investigated. All findings shall be communicated with the complainant to the extent permitted by law.

L. Privacy

To protect the integrity of law enforcement operations and the effectiveness of ALPR technology, the specific locations of fixed ALPR cameras shall not be publicly disclosed. Public disclosure of specific ALPR locations can compromise investigative effectiveness, reduce the deterrent value of the technology, and enable individuals to avoid or circumvent detection. Additionally, disclosure of camera locations increases the risk of vandalism or intentional damage to ALPR equipment, resulting in avoidable repair costs and unnecessary expense to the city of Woonsocket.

M. Training

New WPD employees shall be trained on the use of the ALPR Flock system. The Operations Captain should ensure that members receive department-approved training for those authorized to use or access the ALPR system on an as-needed basis.

N. Responsibility

It shall be the responsibility of all WPD personnel to familiarize themselves and comply with this WPD policy and all laws.

Section 2. This Ordinance shall take effect on the eleventh (11th) consecutive day following its passage by the City Council, as provided in Chapter III, Section 9 of the Woonsocket Home Rule Charter and all Ordinances or parts of Ordinances inconsistent herewith are hereby repealed.

Kristina Contreras Fox
City Councilor

Daniel M. Gendron
City Council President

IN CITY COUNCIL October 5, 2026 – Read by title, amended and passed for the first time unanimously.
AMENDMENT: In Section 1 (F)(6) delete “may” and insert “shall”; delete “criminal prosecution, civil liability, and/or”; after “sanctions” insert “, including and up to termination, and may be subject to criminal prosecution or civil liability”; and delete “pursuant to and consistent with the collective bargaining agreement and department policies”. In Section (6)(G)(2) delete all three (3) references of “should” and in its place insert “shall”.