

Memorandum

Potential Policy Clarifications and Optional Amendments to the ALPR Ordinance

Submitted for Council Consideration by:

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Dear colleagues, at the suggestion of the Town Solicitor during our last meeting, I am sharing this document outlining potential policy clarifications and optional amendments the Council may wish to consider as it refines the original ordinance. I hope this material provides additional context for some of the changes proposed in last month's alternative ordinance while also offering the Council further options to review and discuss if members choose to do so.

I. Potential Amendments Pertaining to Bristol Police Department Use

Amendment 1: If there is interest in articulating a clearer meaning of “law enforcement and public safety purposes,” the Council may wish to consider further defining “official law enforcement purpose” so that the standard is clear and enforceable. One possible formulation that can be added to subsection (d) is:

ALPR technology may be accessed or used by the Bristol Police Department solely for official law enforcement purposes and shall be used only to scan, detect, and identify license plate numbers for the purpose of identifying:

- a. Stolen vehicles;
- b. Vehicles associated with wanted, missing, or endangered persons;
- c. Vehicles that register as a match within the National Crime Information Center; and
- d. Vehicles associated with a suspect in an ongoing, active investigation of a violent felony or domestic violence offense.

Amendment 2: Under Authorized Use, some jurisdictions have experienced challenges with vague search justifications. To promote clarity and accountability, the Council may wish to consider adding the following language as a new item within subsection (d):

Use of the term “investigation” or other nonspecific justifications, standing alone, shall be insufficient.

Amendment 3: For additional transparency regarding system expansion, the Council may wish to consider requiring an ordinance amendment for the installation of any additional cameras. One possible approach is replacing subsection (d) 4 with the following language:

ALPR technology shall initially be limited to the installation of one Flock Camera System. The number of Flock Camera Systems installed may be increased only through adoption of an ordinance by the Town Council following public notice and opportunity for comment.

Amendment 4: Some [jurisdictions have documented concerns regarding the use of ALPR technology in investigations related to reproductive health laws](#). If the Council wishes to address this issue explicitly, it may consider adding the following item under prohibited uses:

For the purpose of identifying, tracking, or determining an individual's reproductive or gender affirming healthcare status or decisions.

Amendment 5: There have also been concerns nationally about [indirect data access by federal immigration authorities through task forces operating under section 287\(g\) of the Immigration and Nationality Act](#). If the Council wishes to create a clear and enforceable boundary, it may consider adding the following data sharing restriction below subsection (h)1c:

Absent a judicial probable cause warrant, ALPR data shall not be shared with any agency, task force, or jurisdiction that employs, deputizes, or authorizes personnel pursuant to section 287(g) of the Immigration and Nationality Act, or any substantially similar program, regardless of the stated purpose of the request.

Amendment 6: The current auditing language may benefit from additional specificity. If the Council wishes to adopt a percentage based approach rather than a fixed number of reviews, it may consider replacing (i)3 with the following language :

The Bristol Police Department shall conduct quarterly internal audits of no fewer than twenty percent of manual searches. The Chief of Police shall provide the Town Council with quarterly written summaries confirming that required audits were conducted and certifying compliance, along with any aggregated, non identifying information as permitted.

Amendment 7: To reduce the risk of false positives resulting from outdated hot lists, the Council may wish to consider adding the following as a new item under subsection (i):

Any Town government entity that uses an automated license plate reader system pursuant to this section shall update relevant hot list databases in real time, at the beginning of each shift, or whenever such updates become available.

Amendment 8: If the Council wishes to enhance transparency and facilitate APRA requests without disclosing sensitive information like license plate numbers or names, it may consider establishing a public transparency log. One possible framework can be added as a new subsection after subsection (k) Sunset, review, and Council opt-out:

The Bristol Police Department shall maintain a publicly accessible monthly log of ALPR use containing aggregated, non identifying information, including:

- a. The aggregate number of vehicle scans per month and the databases queried;
- b. The specific authorized purpose for searches, with nonspecific terms such as “investigation” deemed insufficient;
- c. Monthly outcomes, including stolen vehicle recoveries, warrant matches, and other enforcement actions;
- d. The census tract locations of fixed cameras;
- e. A summary of complaints received; and
- f. Any documented instances of erroneous identification.

The public log shall not include specific license plate numbers.

- II. Potential Amendments Pertaining to Rhode Island State Police Use of Cameras Installed in Town of Bristol. All of these amendments can be contained in subsection (k) Sunset, review, and Council opt-out.

Amendment 9: Although the Town cannot control Rhode Island State Police operations, the Council may wish to clarify the conditions under which Bristol participates in the statewide network. If desired, the following participation standard could be considered as a new item in subsection (k):

Data generated by ALPR technology within the Town of Bristol shall contribute to the Rhode Island State Police ALPR program only if:

- a. The Rhode Island State Police conducts quarterly audits of no fewer than twenty percent of all manual ALPR searches; and
- b. The Rhode Island State Police does not enter into, maintain, or enforce any memorandum of understanding or data sharing agreement with any agency, task force, or jurisdiction that employs personnel pursuant to section 287(g) of the Immigration and Nationality Act, or any substantially similar program.

Amendment 10: If there is concern that Rhode Island State Police policy could change without local awareness, the Council may wish to consider adding the following provision to the ordinance under subsection (k):

Participation in the Rhode Island State Police Flock ALPR network shall terminate upon any material amendment to Rhode Island General Order 80 G unless such change is affirmatively approved by the Town Council following public notice and opportunity for comment.

Amendment 11: Similarly, if the Council wishes to ensure visibility into future platform capability changes (e.g., predictive analytics, new technologies, etc.), it may consider adding the following provision under subsection (k):

Participation in the Rhode Island State Police Flock ALPR network shall terminate upon any material expansion of the Flock Safety platform, including changes to analytics, data retention, access controls, or sharing capabilities, unless affirmatively approved by the Town Council following public notice and opportunity for comment. Routine security patches, vulnerability remediation, bug fixes, and maintenance updates that do not materially alter system functionality may proceed without prior Council approval.