

Kent PD	WASPC	Title
#6.90	N/A	Automated License Plate Readers

1. PURPOSE AND SCOPE

Automated license plate reader (ALPR) technology captures images of license plates and vehicles and converts those images into characters and vehicle characteristics that are then word searchable. ALPR systems are used by the Kent Police Department for official law enforcement purposes only. The purpose of this policy is to ensure employee compliance with state and federal law.

It is a gross misdemeanor crime for any person to willfully and intentionally query, access, or use an ALPR system for a purpose not specifically authorized under state law, or to willfully and intentionally retain, sell, share, permit access, or disseminate ALPR data or audit trail data in violation of state law. Any information that is knowingly obtained in violation of the law is generally inadmissible in any criminal or civil case in all courts of this state.

2. DEFINITIONS

Audit Trail Data:

All forms of data collected or generated by an ALPR system that identify how the system is accessed or used. The term "audit trail data" includes information about who accesses or uses the system, and how and when the system is accessed or used. The term "audit trail data" does not include ALPR data.

Automated License Plate Reader (ALPR) Data:

All data collected by ALPR systems including, but not limited to, GPS coordinates, location, date and time, speed of travel, photograph, license plate number, vehicle characteristics, or other identifying information. The term "ALPR data" does not include audio or video recordings generated by a dashboard or body worn camera, unless such recordings are converted into computer-readable license plate characters or associated metadata, or are indexed, made searchable, or analyzed by license plate number, individual, vehicle, biometric identifier, or other unique identifier for the purpose of identifying, tracking, or reconstructing an individual's or vehicle's location.

Effective:	05/22/23
Revised:	06/04/26
Kent PD	6.90
WASPC	N/A
Previous Kent PD Policy	N/A

Kent PD	WASPC	Title
#6.90	N/A	Automated License Plate Readers

Automated License Plate Reader (ALPR) System:

A system, software, or computer algorithm, whether used independently or in combination with one or more mobile or fixed automated cameras, that is used to convert images of license plates into computer-readable data. The term "ALPR system" excludes automated school bus cameras, speed safety camera systems, and automated traffic safety camera systems, as defined in RCW 46.63.210, that do not interface or interact with an ALPR system for purposes other than those authorized under RCWs 46.63.180, 46.63.200, or 46.63.220 through 46.63.260. ALPR systems may consist of stationary and/or mobile camera systems.

3. AUTHORIZED USE

Kent Police Department personnel may access, operate, or use the department's ALPR system(s) and its associated data for the following purposes only:

- (a) Comparing captured ALPR data with data in any of the following databases maintained by either a federal or Washington State agency:
 - (1) Department of Licensing
 - (2) State Criminal Justice Information System
 - (3) FBI Kidnappings and Missing Persons List
 - (4) National Center for Missing and Exploited Children
 - (5) Washington State Missing Persons List
- (b) Comparing captured ALPR data with license plate numbers or vehicle characteristics, either through a search or a vehicle alert, upon an officer's determination that such license plate or vehicle characteristics are relevant and material to an investigation of a vehicle that is:
 - (1) Stolen;
 - (2) Associated with a missing or endangered person;
 - (3) Registered to an individual for whom there is an outstanding felony or gross misdemeanor arrest warrant; or
 - (4) Related to or involved in a felony or gross misdemeanor crime.

Effective:	05/22/23
Revised:	06/04/26
Kent PD	6.90
WASPC	N/A
Previous Kent PD Policy	N/A

Kent PD	WASPC	Title
#6.90	N/A	Automated License Plate Readers

Custom vehicle alerts may only be created for the purposes listed in this section and must be deleted when they no longer meet this criteria.

- (c) To enforce restrictions on the use of parking spaces or to identify vehicles in a database for impoundment or immobilization under a local ordinance enacted under RCW 46.55.240, provided the database includes only license plates of vehicles subject to that ordinance.

4. PROHIBITED USE

(a) Protected Facilities

ALPR data may not be collected on the premises or immediate surroundings or access to or from:

- (1) Facilities that provide protected health care, as described in RCW 7.115;
- (2) Facilities conducting an immigration matter as defined in RCW 19.154.020;
- (3) Elementary and secondary schools;
- (4) Places of worship;
- (5) Courts; or
- (6) Food banks.

For purposes of this section, "facilities" includes only the building or buildings used for the purposes described in this section and any immediately adjacent parking lots that are primarily or exclusively used for the purposes described.

(b) Unauthorized Investigations

Personnel shall not access, operate, or use an ALPR system or ALPR data for any purpose not listed in section 3 of this policy.

Effective:	05/22/23
Revised:	06/04/26
Kent PD	6.90
WASPC	N/A
Previous Kent PD Policy	N/A

Kent PD	WASPC	Title
#6.90	N/A	Automated License Plate Readers

(c) **Direct Access Limited**

The department's operational technology commander, or his or her designee, is responsible for reviewing direct access requests from other state or local law enforcement agencies who are authorized to collect ALPR data under Washington State law. Personnel shall not provide any other entity with direct access to the department's ALPR system(s).

Third party vendors providing ALPR system services may only access the department's ALPR system(s) solely to the extent necessary to fulfill a specific department-authorized purpose.

(d) **Data Sharing Limited**

Personnel shall not disclose, share, or permit access to ALPR data except as permitted in section 6(b) of this policy. Personnel shall not sell, lease, rent, or purchase ALPR data or audit trail data.

(e) **Private ALPR Data**

Personnel may not obtain privately held ALPR data without a valid, court-issued probable cause search warrant. Based on state law, private entities may not consent to provide law enforcement with private ALPR data. A search warrant is required.

(f) **ALPR Hits and Alerts**

A positive match by an ALPR system alone does not constitute reasonable suspicion for an officer to stop the vehicle. Officers shall develop independent reasonable suspicion for the stop or immediately confirm visually that the license plate on the vehicle matches the image of the license plate displayed on the ALPR system and confirm by other means that the license plate number is in one of the databases specified in section 3(a) of this policy.

Effective:	05/22/23
Revised:	06/04/26
Kent PD	6.90
WASPC	N/A
Previous Kent PD Policy	N/A

Kent PD	WASPC	Title
#6.90	N/A	Automated License Plate Readers

5. USER RESPONSIBILITIES

All Kent Police Department personnel who access an ALPR system are required to report the following actions:

- (a) The incident report or call for service number related to the search;
- (b) The specific purpose for accessing or querying the system, including the offense type for any criminal investigation;
- (c) Any search of the system that yielded results;
- (d) Any time ALPR data is exported or downloaded;
- (e) ALPR matches that result in a traffic stop;
- (f) ALPR matches that result in an arrest;
- (g) Any stolen vehicle recovered due to use of an ALPR system; and
- (h) Any stolen license plate recovered due to use of an ALPR system.

All ALPR system users will report the above actions using the method required by the department, whether through the ALPR system itself or through a separate departmental record system.

6. DATA RETENTION

ALPR data shall not be retained for longer than 21 days, with the following exceptions:

(a) **Warrants, Subpoenas, and Court Orders**

When retained pursuant to a valid, court-issued, probable cause felony or gross misdemeanor warrant or subpoena, or as permitted by court order in criminal or civil cases, provided the data is deleted at the conclusion of the criminal or civil case, pursuant to the applicable state record retention scheduled.

Effective:	05/22/23
Revised:	06/04/26
Kent PD	6.90
WASPC	N/A
Previous Kent PD Policy	N/A

Kent PD	WASPC	Title
#6.90	N/A	Automated License Plate Readers

(b) **Evidence**

ALPR data collected as evidence of specific unlawful conduct described in either section 3(a) or 3(b) of this policy will be retained for as long as such captured ALPR data is needed as evidence in the related investigation, pursuant to the applicable state record retention schedule.

(c) **Parking Enforcement**

When retained for the purpose of parking enforcement, provided the data is deleted no later than 12 hours after final disposition of a parking enforcement case, including exhaustion of any applicable appeals.

7. ACCESS, SHARING, AND DISCLOSURE

(a) **Internal Access**

Access to ALPR systems and ALPR data is limited to trained and authorized personnel only. Training will consist of ALPR system use, review of this policy and Washington State law, retention and safeguarding of ALPR data, and system use reporting requirements. Training will be logged in the department's training database.

(b) **External Data Sharing**

ALPR data may not be disclosed, shared, or accessed by any other entity outside of the department except:

- (1) As required in a judicial proceeding;
- (2) Pursuant to a valid, court-issued probable cause felony or gross misdemeanor warrant or subpoena, or as permitted by court order in criminal or civil cases;
- (3) For bona fide research, as defined in RCW 42.48.010, when the data does not include individually identifiable information; or

Effective:	05/22/23
Revised:	06/04/26
Kent PD	6.90
WASPC	N/A
Previous Kent PD Policy	N/A

Kent PD	WASPC	Title
#6.90	N/A	Automated License Plate Readers

- (4) By direct ALPR system access (see section 4[c] of this policy) to other state or local law enforcement agencies who are authorized by Washington State law to collect ALPR data.

All external requests for ALPR data shall be directed to the operational technology commander or his or her designee. The commander is responsible for logging the dissemination of any ALPR data released in response to a legally valid request.

(c) **Public Records Act**

ALPR data is not subject to disclosure under the Public Records Act, except for bona fide research as defined in RCW 42.48.010 when the data does not include individually identifiable information.

8. SYSTEM ADMINISTRATION

Administration and maintenance of ALPR systems and ALPR data is managed by the department's operational technology commander. The commander may assign personnel under his or her command to administer daily operation of the ALPR equipment. The commander's administrative responsibility includes ensuring compliance with all applicable state and federal laws, reviewing direct access requests from other authorized state or local law enforcement agencies, reviewing external requests for ALPR data, and logging any dissemination of ALPR data in response to such requests.

ALPR data that is retained for an authorized purpose listed in section 3 of this policy will be handled in accordance with department policies related to the management of digital evidence.

The department will publish an annual report on its ALPR system practices and usage, which shall be posted to the department's public website and submitted to the appropriate committees of the state legislature.

Effective:	05/22/23
Revised:	06/04/26
Kent PD	6.90
WASPC	N/A
Previous Kent PD Policy	N/A

Kent PD	WASPC	Title
#6.90	N/A	Automated License Plate Readers

The department will maintain audit trail data documenting all access to its ALPR system(s), which logs and tracks the system search data as required by state law, for the time period required. At least once each year, the operational technology commander will conduct an internal audit to review all access to and use of the ALPR system(s), as reflected in the audit trail data, and the department's compliance with the data retention, purging, and sharing requirements as provided for in this policy.

Effective:	05/22/23
Revised:	06/04/26
Kent PD	6.90
WASPC	N/A
Previous Kent PD Policy	N/A