



COUNCIL STAFF REPORT

CITY COUNCIL of SALT LAKE CITY

TO: City Council Members

FROM: Michael Sanders
Budget & Policy Analyst

DATE: July 21, 2026

RE: Enhancing transparency for Police ALPR systems

Schedule:

Briefing: July 21, 2026
Set Date: August 18, 2026
Public Hearing: September 15, 2026
Consideration: September 22, 2026

ISSUE AT-A-GLANCE

On October 23, 2025, the Council Office received notice that the Police Department had applied for the 2024 COPS Technology and Equipment subaward grant the memo indicated that if approved, the planned use of \$224,000 to purchase and install Automatic License Plate Readers (ALPRs) on major egress and ingress roads as part of a multi-agency effort to improve public safety and reduce criminal activity.

This grant was included as part of FY26 Budget Amendment #3. The Council was briefed on the item on December 02, 2026 and held a public hearing on the item on December 09, 2026. During the public hearing, many constituents expressed that they were very concerned regarding SLCPD's use of ALPRs particularly as they relate to privacy, civil liberties, and the potential for abuse. Following the public hearing, Council chose to defer action on the COPS Grant. Council Leadership requested Council Staff work with the Attorney's Office to craft an ordinance to address concerns related to the Police Department's use of ALPRs.

The proposed ordinance creates regulations over four main categories:

1. Authorized uses
2. Sharing of ALPR data
3. Training
4. Audits/reporting

Goal of the briefing: To provide feedback to Council Staff on ordinance language and prepare for potential consideration during the September 22, 2026 Formal Meeting. A public hearing recommended to be scheduled for September 15, 2026.



POLICY QUESTIONS

1. The proposed ordinance currently requires regular quarterly audits and an annual comprehensive review. The Council may wish to discuss if these audit intervals accomplish the goals related to transparency and oversight.

ADDITIONAL & BACKGROUND INFORMATION

Proposed Ordinance Summary

The ordinance amends Chapter 2.10 of Salt Lake City Code to establish a regulatory framework governing the Police Department's use of Automatic License Plate Reader systems. As part of this amendment, [Article VII of Chapter 2.10](#) (the "body camera ordinance") is proposed to be retitled from "Use of Body-worn Cameras" to "Technology Use," which will broaden the article's scope to accommodate future technology-related regulations. The ordinance establishes definitions, authorized uses, data sharing regulations, training and audit requirements, and addresses conflicts of law.

Please note that in addition to this ordinance, SLCPD is already required to comply with provisions in Utah Code [41-61-20](#) and also maintains a policy for ALPR use. Complete copies of both are attached as Attachment 1 and Attachment 2 respectively.

Authorized Use

The ordinance authorizes use of ALPR technology in accordance with applicable federal, state, and local law, and confines the use of ALPR systems operated by the police department to criminal justice purposes only. Additionally, State law further limits the use of ALPR technology by restricting law enforcement's access to captured plate data. Access to such data is permitted only :

1. As part of an active criminal investigation
2. To apprehend an individual with an outstanding warrant
3. To locate a missing or endangered person
4. To locate a stolen vehicle

Additionally, State law allows SLCPD to access the [Utah Criminal Justice Information System](#) (which houses certain Federal and Utah criminal history and other law enforcement information) to:

1. Verify valid vehicle registration
2. Confirm vehicle identification
3. Verify insurance information
4. Identify a stolen vehicle

The draft ordinance expressly prohibits use of ALPRs for facial recognition, targeting individuals based on their exercise of First Amendment rights, or discriminating against any individual on the basis of race, color, religion, sex, sexual orientation, national origin, age, disability, or genetic information.

Sharing ALPR Data

Captured plate data is classified as a protected record under Utah Code 41-6a-2004(1)(a). Any agency with which the Police Department shares ALPR data is subject to the same standards established under State law. SLPD may only provide access to its ALPR system to other governmental entities through a formal memorandum of understanding that must include the substantive terms identified in lines 58 – 106 of the legislative draft of the ordinance. Key terms include:

- Receiving agencies are prohibited from using the data for commercial or unlawful purposes, or to monitor protected First Amendment activities such as religious services, political events, protests, or lawful assemblies.
- Receiving agencies may not sell, transfer, or further share the data unless specifically authorized

- ALPR data may only be shared with prosecutors or certified peace officers directly connected to a bona fide joint criminal investigation or prosecution.

Additionally, receiving agencies are required to maintain industry best practices for data security, implement unique user login credentials, ensure personnel complete all required training, and maintain written compliance policies holding staff accountable for misuse or unauthorized disclosure. They are also required to maintain audit logs with associated case numbers and justifications for each query, conduct regular self-audits, and cooperate with any City audit or inspection. Audit trail records and annual audit reports must be retained for a minimum of five years, and any annual audit report finding a material violation of the memorandum of understanding must be provided to the Police Department within five days of discovery. Any actual or suspected data breach must be reported to the City within 24 hours. Receiving agencies must carry required insurance coverage, and upon termination of the agreement, system access will be revoked.

Training

All SLCPD officers and personnel whose job duties warrant access to the ALPR system, will be required to complete training prior to use.

Audits

SLCPD will conduct quarterly audits to ensure baseline compliance. These audit records are subject to standard GRAMA disclosure requirements. In addition, the Department will conduct a comprehensive annual review covering overall system use, access controls, data retention practices, and compliance trends. The annual review will be posted publicly on the City's website.

SLCPD's use of ALPRs and the Real Time Crime Center

During small group meetings in January of 2026, the Police Department hosted tours of the Real Time Crime Center to the Council. They presented on the current uses of ALPR technology and talked about current Police policy on ALPRs which are a key component of the Real Time Crime Center

The Department clarified that the City's contracted vendor is Vigilant Solutions and only authorized SLCPD personnel and approved law enforcement partners are permitted to access ALPR information. The information is not shared with other agencies.

The City's License Plate Reader system is used exclusively for criminal investigations. It is not authorized for civil investigations and cannot be used for that purpose. Federal agencies cannot directly compel the City to hand over LPR data without a warrant or other court order.

To access or query LPR data, users must log into the system and document a case number, the authorized purpose, and the authorized reason for the search. This requirement applies to both internal SLCPD personnel and any external users granted access under a memorandum of understanding.

LPR data includes vehicle and license plate images, the license plate number, and geographic location information.

When SLCPD enters into a memorandum of understanding with an external organization, the outside entity is not provided a standalone copy of the dataset. Instead, they are granted controlled, query-only access to the system — they can conduct searches but cannot manipulate or alter data. SLCPD retains full visibility into all searches conducted by external users, and access can be revoked at any time, immediately terminating the external agency's ability to query the system.

All LPR searches, both internal and external, are fully auditable. Audits are currently nontargeted and conducted on a random basis, with a current goal of one audit per month reviewing a batch of searches. At present, audits are conducted by system administrators, who are non-sworn civilian staff, though there is consideration of transitioning this function to a dedicated internal auditor in the future. A Legislative Audit has recommended hiring an internal auditor, which may become a future budget request. In addition to routine audits, reviews may also be initiated in response to suspected misuse or public complaints. Audit records may be subject to public disclosure through a standard GRAMA request, with all releases governed by applicable law.

The Real Time Crime Center has limited AI capabilities associated with a small subset of camera systems. The AI currently in use is not generative, it does not learn or evolve over time, and facial recognition is not used. The only AI feature currently enabled is object recognition, which allows users to filter images based on the presence of general objects, functioning similarly to the search feature in a smartphone photo application. All AI-generated search results are reviewed and verified by a human before being used for any investigative purpose.

ATTACHMENTS

1. Utah State Code - Automatic License Plate Reader Act
2. Police Policy 426 - Automated License Plate Readers