

Community Engagement Plan for ALPR Policy

CLEVELAND COMMUNITY POLICE COMMISSION

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1. Purpose and Overview

This Community Engagement Plan establishes a structured, transparent, and inclusive process for gathering community input to inform the revision of the Automated License Plate Reader (ALPR) policy governing the use of this technology by law enforcement.

The engagement process will occur in two primary phases: (1) pre-policy drafting community engagement and input gathering and (2) post-policy drafting review and feedback. The first phase will solicit general perspectives on ALPR use in law enforcement, community priorities, concerns, and recommendations for policy language. The second phase will provide residents, subject matter experts, and other stakeholders an opportunity to review and comment on the draft policy before the Community Police Commission (“Commission”) votes on it.

The process is intended to ensure that the revised policy reflects community priorities, addresses public concerns, and establishes clear expectations for the appropriate use, oversight, and governance of ALPR technology.

2. Engagement Goals and Objectives

The community engagement process will pursue the following goals:

- **Gather community perspectives:** Understand residents’ views on the use of ALPR technology in law enforcement, including perceived benefits, risks, and potential impacts on public trust.
- **Inform policy development:** Identify community priorities and recommendations to guide the development of policy language, standards, and safeguards.
- **Engage diverse stakeholders:** Provide opportunities for residents from the east and west sides of the community, subject matter experts, law enforcement leadership, and community organizations to contribute.
- **Promote transparency and accountability:** Create meaningful opportunities for the public to understand the policy revision process and provide input at multiple stages.
- **Validate the draft policy:** Obtain feedback on proposed policy provisions and assess whether the draft adequately addresses the concerns and priorities identified during initial engagement.
- **Document community input:** Establish a clear process for collecting, analyzing, and incorporating feedback into policy revisions.

3. Guiding Principles

All engagement activities will be guided by the following principles:

- **Accessibility and inclusion:** Offer multiple ways to participate, including in-person engagement and online feedback opportunities.
- **Geographic representation:** Conduct resident-facing focus groups and community listening sessions on both the east and west sides of the community.
- **Education:** Share information about what ALPRs are, how they are currently used in the City, why some stakeholders want to keep the policy unchanged, and why some stakeholders want to further restrict or eliminate them.
- **Transparency:** Clearly communicate the purpose of each engagement activity, how feedback will be used, and the stages of the policy revision process.
- **Meaningful participation:** Seek substantive input on both general policy direction and specific policy language rather than limiting engagement to informational presentations.
- **Consistency:** Use common themes, questions, and feedback categories across engagement activities to support comprehensive analysis.
- **Accountability:** Document the feedback received and explain how it informed the final policy, including where recommendations were not adopted and why.

4. Engagement Approach and Phases

Phase I: Pre-Drafting Community Engagement and Input Gathering

Objective: Gather broad community and stakeholder input to inform the initial development of the revised ALPR policy.

This phase will take place before policy drafting begins. Engagement activities will focus on understanding perspectives regarding ALPR use in law enforcement, identifying desired protections and limitations, and gathering recommendations for policy language.

Activity 1: Resident-Facing Focus Groups

- **Number:** Two focus groups; one serving east-side residents and one serving west-side residents; 7-10 residents per focus group.
- **Purpose:** Gather detailed feedback from residents regarding their understanding of ALPR technology, their views on its use in law enforcement, and the policy provisions they believe are necessary to ensure appropriate use.
- **Approach:** Facilitated discussions will invite participants to share perspectives, identify concerns, and recommend policy standards. Discussion topics may include

appropriate uses of ALPR technology, restrictions on access and use, data retention, information sharing, privacy protections, oversight, accountability, and public transparency.

- **Expected outcome:** A summary of resident perspectives, priorities, concerns, and recommended policy language to inform the initial policy draft.

Activity 2: Subject Matter Expert Focus Group

- **Number:** One focus group.
- **Purpose:** Obtain technical, legal, operational, and policy-related perspectives to support the development of a clear, practical, and accountable ALPR policy.
- **Approach:** Invite relevant subject matter experts to discuss ALPR capabilities and limitations, legal and regulatory considerations, operational practices, data governance, privacy risks, oversight mechanisms, and policy safeguards. Discussion will focus on identifying considerations that should be addressed in the revised policy.
- **Expected outcome:** A summary of expert recommendations and considerations for policy development.

Activity 3: Police Chiefs Association Feedback Session

- **Number:** One feedback session.
- **Purpose:** Gather law enforcement leadership perspectives on ALPR use, operational needs, and the feasibility of proposed policy requirements.
- **Approach:** Facilitate a structured discussion with the Police Chiefs Association regarding current and anticipated ALPR practices, appropriate uses, operational considerations, oversight, accountability, and recommended policy provisions. Feedback will be considered alongside resident and subject matter expert input.
- **Expected outcome:** Documented law enforcement leadership feedback to inform the development of policy language while maintaining consideration of community priorities and public accountability.

Activity 4: Call for Position Statements from Community Organizations

- **Number:** One community-wide call for submissions.
- **Purpose:** Invite community-based organizations and other relevant organizations to provide formal, considered recommendations regarding ALPR use and policy development.
- **Approach:** Distribute a public request for position statements outlining the policy revision process, submission instructions, and the types of feedback sought. Organizations may address community concerns, civil liberties, privacy, public

safety, transparency, oversight, data management, or specific recommendations for policy language.

- **Expected outcome:** A collection of organizational perspectives and written recommendations to be reviewed and considered during policy drafting.

Activity 5: Initial Community Survey

- **Number:** One online survey.
- **Purpose:** Expand participation beyond those able to attend in-person engagement activities and gather broader community perspectives on ALPR use and policy priorities.
- **Approach:** Publish an online survey accessible to residents throughout the community. Questions will solicit general views on ALPR use in law enforcement, perceived benefits and risks, desired safeguards, and priorities for policy language. The survey should use accessible language and provide an opportunity for respondents to submit additional comments.
- **Expected outcome:** A summary of survey responses, including key trends, areas of agreement or disagreement, and priorities to consider during policy drafting.

Phase I Deliverable: Community Input Summary

Following completion of the initial engagement activities, the Commission will consolidate and analyze feedback from the focus groups, Police Chiefs Association session, organizational position statements, and online survey.

The resulting Community Input Summary will identify:

- Common themes and areas of agreement.
- Differing perspectives and areas requiring further consideration.
- Community priorities and concerns.
- Recommendations for specific policy language and safeguards.
- Issues requiring legal, operational, or technical review.

This summary will serve as a primary reference document for the policy drafting process.

Phase II: Policy Drafting

Objective: Develop a draft ALPR policy informed by the findings of Phase I.

Following the initial engagement period, the Commission will prepare a draft revised policy. In addition to internal policy research, the drafting process will consider community

feedback, subject matter expert recommendations, law enforcement operational considerations, and applicable legal requirements.

The Commission will maintain a record of how key themes and recommendations from Phase I are reflected in the draft. Where recommendations cannot be incorporated, the team should document the relevant legal, operational, or policy rationale. This will be published on the Commission's website as a public document.

Phase II Deliverable: A preliminary draft ALPR policy for stakeholder and community review.

Phase III: Draft Policy Review and Community Feedback

Objective: Provide stakeholders and residents with an opportunity to review the draft policy, assess its responsiveness to community priorities, and recommend revisions before finalization.

Activity 6: Draft Policy Distribution to Focus Group Members

- **Number:** One distribution and feedback period.
- **Purpose:** Obtain targeted feedback from participants who contributed to the initial focus groups and provide continuity between the first and second phases of engagement.
- **Approach:** Distribute the draft policy to resident-facing focus group members and subject matter expert focus group members. Invite participants to review the proposed language and provide written comments on clarity, completeness, effectiveness, and responsiveness to concerns raised during Phase I. Feedback requests should encourage participants to identify provisions that address their concerns, provisions that remain unclear or insufficient, and additional language or safeguards they recommend.
- **Expected outcome:** Consolidated stakeholder comments and recommendations for revisions to the draft policy.

Activity 7: Community Listening Sessions on the Draft Policy

- **Number:** 1-2 listening sessions; goal of 50 attendees per session.
- **Purpose:** Present the draft policy to the broader community and obtain feedback on whether the proposed provisions address community priorities and concerns.
- **Approach:** Provide participants with access to the draft policy in advance, when feasible. During each session, summarize the major provisions, explain how the

draft was informed by Phase I engagement, and facilitate discussion of the proposed policy language. Participants will have opportunities to identify gaps, recommend changes, and raise questions regarding implementation and accountability.

- **Expected outcome:** A documented summary of public feedback, including recommended amendments, areas of support, outstanding concerns, and provisions requiring clarification.

Activity 8: Draft Policy Community Survey

- **Number:** One online survey.
- **Purpose:** Gather broader community feedback on the draft policy and provide an additional opportunity for participation by residents who may not attend listening sessions.
- **Approach:** Publish a second online survey focused on the draft policy. The survey should allow respondents to assess whether the draft addresses key concerns, identify provisions that require clarification or revision, and recommend additional safeguards or policy language. Questions should be linked to specific policy topics or provisions where practical.
- **Expected outcome:** A summary of community responses identifying the perceived strengths and weaknesses of the draft, recommended revisions, and issues requiring additional consideration.

Phase III Deliverable: Draft Policy Feedback Summary

The Commission will consolidate feedback from focus group members, community listening sessions, and the second online survey.

The summary will identify:

- Recommendations for specific policy amendments.
- Provisions that require clarification or additional safeguards.
- Areas of support and continuing concern.
- Issues that warrant further legal, operational, or technical review.
- Recommended revisions to the draft policy.

5. Final Policy Revision and Documentation

Following Phase III, the Commission will review all feedback and revise the draft as appropriate. The team will assess each substantive recommendation based on its

relevance to community priorities, legal requirements, operational feasibility, and the objectives of the revised policy.

A public-facing summary should explain which major recommendations were incorporated, which were not incorporated, and the reasons for those decisions. The revised policy may then proceed through the Policy Committee review for approval, and then to the Full Commission for their consideration.