

DRAFT POLICY

PARKING ENFORCEMENT AUTOMATED LICENSE PLATE READER (ALPR)

Purpose

This policy establishes guidelines for the use of Automated License Plate Reader (ALPR) technology and data specifically for parking management and enforcement activities in the City of Alameda.

This policy functions separately from the Alameda Police Department (APD), APD Policy 462, where by ALPR data is used more broadly to “assist in on-going criminal investigations, crime prevention, crime detection, the apprehension of wanted persons,” and more.

ALPR Definition and Parking Enforcement Usage

ALPR technology functions by automatically capturing an image of a vehicle's license plate, transforming that image into alphanumeric characters using optical character recognition software, and storing that information, along with relevant metadata (e.g. geo-location and temporal information, as well as data about the ALPR).

ALPR technology allows parking enforcement procedures to be automated, eliminating the laborious manual processes needed without it. When parking payment is tied to license plates, Parking Enforcement Officers (PEOs) can check payment status simply by driving down the street in an ALPR-equipped vehicle. Similarly, ALPR allows efficient enforcement of time-limited parking, without requiring PEOs to chalk tires or manually record license plate numbers and locations.

Per California state law regarding parking violation enforcement, PEOs will always print physical citations and place them on vehicles. Parking citations cannot be automatically issued via mail.

Authorized

The City Manager, or his or her designee shall assign personnel to operate and manage the ALPR system. PEOs, Alameda Police Department staff, and any contractors involved in issuing citations and collecting parking citation fines are authorized to access the ALPR data needed to process citations. No ALPR operator may access California Law Enforcement Telecommunications System (CLETS) data unless otherwise authorized to do so.

Users

City personnel shall not use, or allow others to use, the ALPR equipment or database records for any unauthorized purpose. The City Manager, through his or her designee, shall ensure that the ALPR system is operated in conformity with this Policy and other Department policies, procedures, rules and regulations. The Chief shall enforce this Policy and shall act as the Department Head for all disciplinary and enforcement actions for any violations by Department personnel.

ALPR Data Collection and Retention

All data and images gathered by an ALPR are for the official use of the City of Alameda and because such data may contain confidential CLETS information, it is not open to public review. ALPR information gathered and retained by this Department may be used and shared with prosecutors or others only as permitted by law.

All ALPR data shall be stored as described below and thereafter shall 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 lawful action to produce records. In those circumstances the applicable data shall be downloaded from the server and booked into evidence. The records will then be subject to standard evidence retention policies and statutes.

Parking enforcement ALPR data is stored based on the following schedule:

- License plates collected but not cited: not retained
- License plates for issued parking citations: two years

Information Sharing

ALPR data collected during parking enforcement is only used by employees and contractors who are responsible for processing citations and handling parking payments. This data may contain confidential information and is not open to public review.

Non-law enforcement requests for information regarding a specific vehicle's license plate may be honored when the requester is the registered owner of the vehicle in question, and when providing such information will not invade the privacy of a third party. The requester in such cases must provide acceptable proof of his or her identity and of ownership of the vehicle in question.

The City's chosen Parking Enforcement ALPR vendor may periodically provide aggregated reports to the City of Alameda Public Works and Planning, Building, and Transportation departments so that they can analyze data about parking demand. These reports will not contain any information about a vehicle's license plate number, the name of the registered owner, address of registered owner, or any other information gleaned from the license plate number associated with a particular vehicle. Rather, the reports will consist of 100 percent anonymized information using identification numbers that are not associated with a particular license plate or registered owner.

Training

All authorized parking enforcement ALPR users shall first complete department-approved training on the proper handling of ALPR data. The training addresses appropriate handling and transmission procedures, as well as consequences of an ALPR data security breach.

Information Security

The ALPR system database and software resides in a data center featuring full redundancy and access controls. The data remains property of the City of Alameda, and is managed according to this Policy.

The ALPR system is governed by the Permitted/Impermissible Uses as outlined in this Policy.

The ALPR data contains no Personally Identifiable Information (PII) that may be used to connect license plate detection to an individual. It is only with permissible purpose that an investigator may make this connection (using other systems) and this access is already governed by the Federal Driver's Privacy Protection Act (DPPA).

All queries into ALPR data are logged by user and available for auditing and review by the Department. 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. A routine check to ensure the equipment is working properly should be done at the beginning of each shift by the user logging into the system.

Measures will be taken to ensure the accuracy of ALPR information. Errors discovered in ALPR data collected by ALPR units are marked, corrected, or deleted in accordance with the type and severity of the error in question.

Data will be encrypted when transmitted.

Auditing and Oversight

To ensure proper oversight into the use of the system and adherence to this policy, all activities (plate detections, queries, reports, etc.) are automatically recorded by the system for auditing purposes. The audit report shall include an explanation regarding any data retained longer than six months (e.g. data retained as evidence in a criminal case).