Policy on Use of License Plate Recognition Technology

<table>
<thead>
<tr>
<th>Policy Title</th>
<th>Policy on Use of License Plate Recognition Technology</th>
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<tbody>
<tr>
<td>Policy #</td>
<td>02.101.2</td>
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<tr>
<td>Policy Owner</td>
<td>Department of Public Safety</td>
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<tr>
<td>Contact Information</td>
<td>Questions regarding this policy should be directed to the Director of Public Safety (401) 874-2109</td>
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<tr>
<td>Approved By</td>
<td>Senior Leadership Team</td>
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<tr>
<td>Effective Date</td>
<td>June 11, 2021</td>
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<tr>
<td>Next Review Date</td>
<td>October 31, 2026</td>
</tr>
<tr>
<td>Who Needs to Know About this Policy</td>
<td>All faculty, staff, and students at the University as well as University Affiliates and any other parties provided permission to park on University Property</td>
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### Definitions

- **License Plate Recognition (LPR).** License Plate Recognition technology that automates the collection of license plate numbers by capturing images of license plates and converting them into computer-readable data.

- **University Affiliate.** Any individual who is not a faculty member, staff, or student who otherwise has a formal relationship with the University, including but not limited to visiting scholars, visiting students, research fellows, professional program participants, club sports coaches, and volunteers as well as employees and associates of the URI Foundation and Alumni Engagement, URI Research Foundation, and members of the University of Rhode Island Board of Trustees. Vendors and contractors are not considered University Affiliates, except for those with an ongoing presence on the University campus as regular operations support staff.

- **University Property.** Property belonging to the State of Rhode Island and held in trust by the University of Rhode Island Board of Trustees; property held by the University of Rhode Island or any of its component units in its own name; and property owned by third parties but assigned to, occupied by, or managed by the University or any of its component units.

- **Statutes, Regulations, and Policies Governing or Necessitating This Policy**
  - None

- **Reason for Policy/Purpose**
  - To provide guidelines for use of License Plate Recognition technology at the University of Rhode Island.

- **Forms Related to this Policy**
  - None
Policy Statement

General

The University of Rhode Island utilizes automated License Plate Recognition technology for purposes of parking access control, administration and enforcement, and law enforcement investigations on University Property.

Use of Data

The use of data collected by the License Plate Recognition system is limited to parking access control and administration, parking enforcement, and law enforcement investigations.

URI Transportation and Parking utilizes LPR data to determine a vehicle’s access permissions in a given parking area or controlled access area of campus and support the issuance of a parking citation if needed.

License Plate Recognition data is also used by the URI Police Department in conducting ongoing criminal investigations and investigations of complaints. The URI Police Department may utilize LPR data with active connections to state and federal sponsored lists containing stolen vehicle, wanted person, and missing person information. Any use of the data for purposes outside of these stated purposes must be detailed and approved in writing by the Director of Public Safety and the Vice President for Administration and Finance.

Data Collected

The University’s License Plate Recognition system identifies only a vehicle, not a specific person. No owner or driver information is captured or stored directly with the LPR record. However, vehicle data is linked to individual patron accounts within the parking management system.

The University’s License Plate Recognition system captures two photos of observed vehicles: (1) a context photo of the vehicle and its immediate surroundings and (2) a photo of the license plate. The photos are not of a resolution that allows identification of the vehicle occupants if they are present. Along with the photographic data, the system records the global positioning system coordinates and date/time information of the observation. Further software processing of the license plate image generates an alphanumeric version of the license plate number, which is also stored with the record.

Data Storage and Retention

Data collected via the LPR mobile and fixed systems will be uploaded to and stored on the secure parking management system server hosted by the University’s system vendor.

Data collected by the LPR system will be retained for the maximum period permitted by law.
Privacy

Owners of vehicles traveling or parked on University Property do not have a legal expectation of privacy with regard to the location or presence of their vehicle while on University Property. However, the University respects individual privacy and therefore access to records created and maintained by the LPR system is restricted to trained Department of Public Safety personnel performing their duties. All personnel with access to the LPR system use unique identifiers and passwords to access records and all login activity, record additions, and other activity is logged. Access to the LPR system by others is strictly prohibited.

Operator Training and LPR Maintenance

All Department of Public Safety employees who may have a need to receive LPR data or utilize LPR technology must first receive appropriate training on the University’s LPR system.

URI Transportation and Parking will maintain all LPR equipment including fixed and mobile components. Any equipment damage should be reported immediately to the Coordinator of Transportation and Parking.

Vehicle Data Requests

Any individual may upon proving identity request a report detailing what, if any, LPR data the University has on vehicles registered specifically to that individual.

Public Notification

The URI Department of Public Safety will notify the public of its LPR data collection activities and policies via:

- Publishing of this policy on the University of Rhode Island’s Policy and Procedures web page
- Posted signage at each entrance to campus.

An e-mail to each user of a registered vehicle will be sent to the registered e-mail address containing policy, procedure, and general information pertaining to the use of LPR and its parking management system. It is important for each registered user to maintain and update their contact information with the University parking management system to receive important notices.

Exceptions

None

Policy Review and Revisions

(Versions earlier than the first policy number may be paper only)

<table>
<thead>
<tr>
<th>Policy #</th>
<th>Effective Date</th>
<th>Reason for Change</th>
<th>Changes to Policy</th>
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<tbody>
<tr>
<td>01.101.1</td>
<td>September 24, 2018</td>
<td>n/a</td>
<td>n/a</td>
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<tr>
<td>02.101.2</td>
<td>June 11, 2021</td>
<td>Scheduled Review</td>
<td>Textual changes for clarity</td>
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