

Policy on Use of License Plate Recognition Technology

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| Policy Title | Policy on Use of License Plate Recognition Technology |
| Policy # | 02.101.1 |
| Policy Owner | Department of Public Safety |
| Contact Information | Questions regarding this policy should be directed to the Director of Public Safety (401) 874-2109 |
| Approved By | Senior Leadership Team |
| Effective Date | September 24, 2018 |
| Next Review Date | October 31, 2020 |
| Who Needs to Know About this Policy | All individuals parking and/or operating motor vehicles on property owned, leased, or managed by the University of Rhode Island |
| Definitions | <p>Fixed Camera. A camera permanently affixed to a structure such as a pole, overhead, or bridge.</p> <p>Mobile Camera. A camera affixed to a vehicle permanently or with magnet-mount.</p> <p>License Plate Recognition or 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.</p> <p>LPR System. A system that employs LPR computer-readable data for the purpose of parking access control, administration and enforcement, and law enforcement investigations.</p> |
| 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

The University of Rhode Island (URI) utilizes automated License Plate Recognition technology for purposes of parking access control, administration and enforcement, and law enforcement investigations on properties owned or managed by the University.

Locations

LPR data is collected by URI Transportation and Parking and the URI Police Department on University-owned or managed streets, parking lots, and structures. The URI LPR System includes a combination of Fixed Camera installations and Mobile Camera vehicle-mounted systems operated by trained personnel.

Data Collected

The LPR 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. Typically, these photos are taken from the rear of the vehicle, although there are occasions where a photo is taken from the front of a vehicle backed into a space or standing in a driving aisle. 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 also 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.

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

Use of Data

The use of data collected by the LPR 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.

LPR data is also used by the URI Police Department in conducting ongoing criminal investigations and investigations of complaints. The URI Police Department has established Standard Operating Procedures pertaining to its officers' use of LPR data for the law enforcement purposes described in this policy. URI Police Department may utilize LPR data with active connections to state and federal sponsored hot 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 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 property owned or controlled by the University do not have a legal expectation of privacy with regard to the location or presence of their vehicle while on property owned or controlled by the University. 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 employees who may have a need to receive LPR data or utilize LPR technology shall first receive appropriate training on the University's LPR System and on implementation of and adherence to this policy.

URI Transportation and Parking shall maintain all LPR equipment including fixed and mobile components. Any equipment damage shall 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 or identified 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:

- Posting of this policy on the Department of Public Safety website;
- 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

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