

# Pasadena Parking Division

## Policy Manual

### Automated License Plate Recognition (ALPR) for Enforcement

#### 1. PURPOSE AND SCOPE

The purpose of this policy is to provide guidance for the capture, storage and use of digital data obtained through the use of Automated License Plate Recognition (ALPR) technology.

#### 2. POLICY

The policy of the Pasadena Department of Transportation's Parking Division is to utilize ALPR technology for parking enforcement to capture and store digital license data and images while recognizing the established privacy rights of the public.

All data and images gathered by the ALPR are for the official use of this department. Because such data may contain confidential information, it is not open to public review.

#### 3. ADMINISTRATION

The ALPR technology, also known as License Plate Recognition (LPR), allows for the automated detection of license plates. It is used by the Parking Division to convert data associated with vehicle license plates for official Parking Division purposes, including identifying vehicles eligible for tow due to overdue citations, and for electronically "chalking" vehicles to enforce time limited parking spaces. It may also be used to identify stolen or wanted vehicles, and be shared with the Pasadena Police Department in accordance with their ALPR policy.

All installation and maintenance of ALPR equipment, as well as ALPR data retention and access, shall be managed by the Parking Manager. The Parking Manager will assign staff members under his/her direction to administer the day-to-day operation of the ALPR equipment and data.

##### 3.1. ALPR ADMINISTRATOR

The Parking Manager shall be responsible for developing guidelines and procedures to comply with the requirements of Civil Code § 1798.90.5 et seq. This includes, but is not limited to (Civil Code § 1798.90.51; Civil Code § 1798.90.53):

- (a) A description of the job title or other designation of the members and independent contractors who are authorized to use or access the ALPR system or to collect ALPR information.
- (b) Training requirements for authorized users.
- (c) A description of how the ALPR system will be monitored to ensure the security of the information and compliance with applicable privacy laws.
- (d) Procedures for system operators to maintain records of access in compliance with Civil Code § 1798.90.52.

- (e) The title and name of the current designee in overseeing the ALPR operation.
- (f) Working with the City's department of Information Technology (Dolt) and the Custodian of Records on the retention and destruction of ALPR data.
- (g) Ensuring this policy and related procedures are conspicuously posted on the department's website.

#### **4. OPERATIONS**

Use of an ALPR is restricted to the purposes outlined below. Department members shall not use, or allow others to use the equipment or database records for any unauthorized purpose (Civil Code § 1798.90.51; Civil Code § 1798.90.53)

- (a) An ALPR shall only be used for official Parking Division business.
- (b) An ALPR may be used in conjunction with any routine Parking Division operation, including parking enforcement activities.
- (c) No member of this department shall operate ALPR equipment or access ALPR data without first completing department-approved training.
- (d) No ALPR operator may access department, state or federal data unless otherwise authorized to do so.
- (e) For scofflaw vehicles, the enforcement officer shall verify registration information and past due citation status prior to immobilization or impound of vehicles that is based solely on an ALPR alert.

#### **5. DATA COLLECTION AND RETENTION**

The Parking Manager is responsible for ensuring systems and processes are in place for the proper collection and retention of ALPR data. Data will be transferred from vehicles to the designated storage in accordance with department procedures.

All ALPR data downloaded to the server should be stored for a minimum of two years in accordance with the City's established records retention schedule. Thereafter, ALPR data will be purged. Any ALPR data shared with law enforcement that becomes related to evidence in a criminal or civil action or data that is subject to a discovery request or other lawful action will be downloaded from the server onto portable media and booked into evidence with the Pasadena Police Department.

#### **6. ACCOUNTABILITY**

All data will be closely safeguarded and protected by both procedural and technological means. The Parking Division will observe the following safeguards regarding access to and use of stored data (Civil Code § 1798.90.51; Civil Code § 1798.90.53):

- (a) All ALPR data downloaded to the mobile workstation and in storage shall be accessible only through a login/password-protected system capable of documenting all access of information by name, date and time (Civil Code § 1798.90.52)

(b) Members approved to access ALPR data under these guidelines are permitted to access the data for legitimate Parking Division purposes only, such as when the data relates to the investigation of a parking violation.

(c) ALPR systems audits should be conducted on a regular basis.

#### **7. RELEASING ALPR DATA**

The ALPR data may only be shared with the Pasadena Police Department, and may be released to other law enforcement or prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law per Pasadena Police Department policy.

Requests for ALPR data by non-law enforcement or non-prosecutorial agencies will be processed as provided in the Records Maintenance and Release Policy (Civil Code § 1798.90.55).

#### **8. TRAINING**

The Parking Manager should ensure that members receive approved training for those authorized to use or access the ALPR system (Civil Code § 1798.90.51; Civil Code § 1798.90.53).