

UC SANTA BARBARA

POLICY AND PROCEDURE

ALPR

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AUTOMATED LICENSE PLATE RECOGNITION SYSTEMS AND INFORMATION

The Automated License Plate Recognition Systems and Information policy (ALPR) acts as the usage and privacy policy required under California Code of Civil Procedure Sections 1798.90.51 and 1798.90.53, respectively. This policy ensures the collection, use, maintenance, sharing, and dissemination of ALPR information is consistent with respect for individuals' privacy and civil liberties, UC and local policy, and UC Santa Barbara's principles of academic freedom and shared governance.

I. SCOPE

This Policy governs the ALPR System operated by University of California Santa Barbara, and applies to all faculty, staff, students, and non-affiliates working or participating in activities on any property owned or leased by UC Santa Barbara including camera and data hosting affiliates.

II. DEFINITIONS

Automated License Plate Recognition (ALPR) Information: Information or data collected with an ALPR system.

Automated License Plate Recognition (ALPR) System: A searchable computerized database resulting from the operation of one or more mobile or fixed cameras combined with computer algorithms to read and convert images of registration plates and the characters they contain into computer-readable data.

Campus ALPR Authority: The campus official authorizing operation of ALPR Systems and use of ALPR Information.

III. POLICY

A. Delegated Authority

The Vice Chancellor of Administrative Services (VCAD) is the delegated authority to act as the Campus ALPR Authority. The VCAD may delegate the role of Campus ALPR Authority; however, no further delegation is allowed.

B. Allowable User

Operation of ALPR Systems and/or access to or use of ALPR Information requires prior written authorization by the Campus ALPR Authority. Applicable background checks must comply with [PPSM-21: Selection and Appointment](#).

All authorized personnel must complete training on ALPR Systems and Information and read the applicable University policies and procedures prior to use. Training must

include:

1. Systems operations to ensure the safeguarding of ALPR Information;
2. Specific uses for which ALPR Systems and/or ALPR Information has been authorized;
3. The requirements for ALPR Information set forth in Section III.G and the procedures to implement them; and
4. Annual UC Cyber Security training certification.

C. Allowable Use

Operation of ALPR Systems and/or access to, or use of, ALPR Information may only be undertaken for University business, as follows:

1. *Parking Services:* For parking management, occupancy counting, violation location, and rule enforcement. ALPR Information is retained in both anonymized and raw form for these business purposes.
2. *Campus Safety:* For use in detecting vehicles entering campus parking facilities owned, or known to be used by, anyone issued an official campus stay away order, court ordered restraining order, or who otherwise poses a direct threat to one or more members of the campus community. UCPD may also request license plate data if it is pertinent to an open UCPD investigation.

Any other operation, access, or use must have prior written approval by the Campus ALPR Authority.

Allowable Users must operate ALPR Systems or access or use ALPR Information only for the purpose(s) specified in their written authorization. Any other operation, access, or use is unauthorized and may result in disciplinary action under University policies or, as applicable, collective bargaining agreements.

D. ALPR Data Collection

UC Santa Barbara's ALPR System captures and stores digital images of license plates, and uses character recognition algorithms to identify and store plate characters. The system creates a searchable computerized database resulting from the mobile and fixed cameras on the UC Santa Barbara Campus. The ALPR System data includes license plate number and the location of the vehicle, date, and time the image was taken.

E. Accuracy and Correction of ALPR Data

Collection of ALPR is automated such that license plate images, and details of collection, are included in the system without review. Although infrequent, license plate translation may be incomplete or inaccurate. The Transportation and Parking Services Operations or Enforcement Managers, or their designees, will ensure accuracy and correct license plate translation errors when identified. Users will also confirm the computer translation prior to taking any action based on ALPR results.

F. Authorization for UC Santa Barbara Transportation & Parking Services

The ALPR Campus Authority has authorized the following departments to operate ALPR Systems and use ALPR Information:

Transportation and Parking Services

Parking Enforcement Officer;

Parking Enforcement Manager/Supervisor; and

Parking positions required for the continued operation of normal parking enforcement, event, and occupancy counting operations.

The ALPR Campus Authority, in accordance with Section III.B, must authorize any additional positions within these departments.

G. ALPR Information Requirements

ALPR Information is classified at Protection Level 4 ([UC Protection Level Classification Guide](#)). UC Santa Barbara departments with Allowable Users who utilize ALPR Information are responsible for ensuring systems and processes are in place for its proper collection, storage, and disposal.

A breach of the security of an ALPR System is subject the [UC Privacy and Information Security Incident Response Plan](#). Notification to the Campus Information Security Officer (CISO) and the Campus Privacy Officer is required for any suspected unauthorized acquisition of ALPR Information that compromises its security, confidentiality, integrity, or the privacy of any individual.

H. Retention

The retention for ALPR Information is no longer than 60 days unless longer retention is necessary to support parking violation enforcement, citation appeal adjudication, scofflaw enforcement, or a law enforcement investigation. Retention and destruction must be facilitated through the ALPR System (or through the destruction of physical media) in accordance with the [UC Institutional Information Disposal Standard](#).

I. Deletion and Anonymization of Data

ALPR Information must be anonymized or deleted after 60 days. Only occupancy information, lot turnover rates, and general activity data may remain as Anonymized ALPR Information. Anonymized ALPR Information is not subject to the 60-day retention schedule.

J. Record of Access

Authorized Users who access non-anonymized ALPR Information must make a record of the access that includes the following information:

1. Who accessed the information;
2. The date and time of access;
3. The purpose for the access; and
4. The license plate number or other data element(s) used to query the ALPR System.

K. Sharing

Authorized Users may share ALPR information with one another as necessary to perform their duties in accordance with this policy. Authorized Users may share ALPR Information with the UCPD¹ in accordance with applicable law and UC policy and at the discretion of the Campus ALPR Authority. The sharing of ALPR Information must be in support of UCPD investigations, or other legal purpose in support of University business (in accordance with UC policy) or where required by law (e.g. in support of a persona non grata or in response to a subpoena). Any sharing of ALPR Information requires (a) written authorization from the Campus ALPR Authority and (b)

¹ Outside law enforcement agencies wishing to access ALPR data must work with the UCPD in accordance with UC policy.

a written agreement between requestor and ALPR Information holder that complies with the provisions of [UC Appendix DS – Data Security and Privacy](#) with Protection Level 4 requirements

L. Prohibition on Sale

ALPR Information may not be sold. The provision of data hosting or towing services shall not be considered the sale, sharing, or transferring of ALPR Information (CA Civil Code § 1798.90.55).

M. Audit

UC Santa Barbara departments with Allowable Users must conduct quarterly audits to review compliance with access rules, records management, system configuration, and to confirm active individual accounts.

N. Privacy Notice

The images stored in the system are collected from areas visible to the public where there is no reasonable expectation of privacy.

O. Publication Requirements

In accordance with CA Civil Code 1798.90.53, the ALPR must be implemented and publicly published on [UC Santa Barbara's Policies and Procedures website](#) and conspicuously on the [Parking and Transportation Services website](#)

IV. RESPONSIBILITIES

Allowable Users: Responsible for completing training prior to any operation, access, or use of an ALPR System or ALPR Information as well as compliance with this policy in any operation, access, or use of an ALPR System or ALPR Information.

Campus ALPR Authority: Responsible for the review and granting of requests for (1) Allowable User status (Section III.B); (2) Exceptions to Allowable Use (Section III.C); and (3) Authorization to share ALPR Information (Section III.I) as well as oversight for compliance with the ALPR policy.

Departments with Allowable Users: Responsible for ensuring compliance with the ALPR policy within their department with particular attention to Sections governing ALPR Information Requirements (III.G), Retention (III.H), Anonymization (III.I), and Record of Access (III.J) as well as ensuring quarterly audits pursuant to Section III.M.

V. REFERENCES

California Code of Civil Procedure Sections [1798.90.51](#) and [1798.90.53](#)
[PPSM-21: Selection and Appointment](#)
[UC Protection Level Classification Guide](#)
[UC Privacy and Information Security Incident Response Plan](#)
[UC Institutional Information Disposal Standard](#)
[UC Appendix DS – Data Security and Privacy](#)