



<b>University of Pennsylvania Police Department</b> 4040 Chestnut Street, Philadelphia, Pa 19104		 
<b>Directive:</b> 94	<b>Subject:</b> Automated License Plate Readers (ALPR)	<b>Effective Date:</b> 08/18/2015
<b>Order of:</b> Gary Williams, Chief of Police		<b>Amended Date:</b> 08/01/2023

## I. Purpose

The purpose of this directive is to establish policy and procedure regarding the appropriate and acceptable deployment, maintenance, training, data storage and associated uses of the Automated License Plate Recognition system (ALPR) by sworn members.

## II. Policy

- A. It is the policy of the UPPD that all personnel shall abide by the guidelines set forth in this directive. All ALPR systems shall at all times be used in a lawful manner that respects the civil rights and civil liberties of all individuals, and will appropriately balance the interests of public safety and individual privacy, and will fully comply with the Pennsylvania and United States Constitutions.
- B. The ALPR and ALPR generated data shall only be used as related to the official business of the University of Pennsylvania Police Department.

## III. Scope

This directive shall affect all sworn police officers trained in the use of ALPR-equipped vehicles.

## IV. Definitions

- A. **Alert Data** – Information captured by an ALPR relating to a license plate that matches a License plate that is listed on a “Hot List”.
- B. **Automated License Plate Recognition System (ALPR)** – A mobile vehicle fixed mounted system consisting of cameras, mobile data terminal, software, and related equipment that automatically and without direct human control locates, focuses on, and photographs license plates and vehicles that come into range of the cameras. The data captured by the system automatically compares the data against one of several “hot lists” and alerts the police, audibly and by MDT screen messaging, when a scanned license plate matches the license plate on the “hot list”.

- C. **ALPR Generated Data** - All information, including GPS coordinates, date and time of a license plate reading, the optical character recognition interpreted data, and any ALPR generated digital photographic image(s) of the license plate and vehicle generated entirely through the use of the ALPR equipment.
- D. **ALPR Operator** – A police officer who has been authorized by the Chief of Police to operate the ALPR, or to access stored data, and who has successfully completed the appropriate training.
- E. **Crime Scene Query** – The process of accessing and reviewing stored ALPR data that had been originally scanned at or about the time and in the vicinity of a reported criminal event for the purposes of identifying vehicles or persons that might be associated with that specific criminal event (such as: suspects, witnesses, or victims.)
- F. **Hot List** – A compilation of license plates that are downloaded twice daily into an ALPR which enables the ALPR to alert the operator if it captures the image of a license plate that matches a license plate included on the “hot list”. The hot list is comprised of registration plate numbers entered into CLEAN, NCIC, or other pertinent law enforcement-related databases, including stolen vehicles, Amber Alert related vehicles, expired/suspended registrations and drivers, terroristic activity related vehicles, vehicles associated with wanted persons, or other vehicles that are of national, state or local law enforcement interest.
- G. **Personal Identifying Information** – Information that identifies one or more specific individuals, including an individual’s name, address, social security number, operator’s license number, or other personal information.

## V. Procedures

- A. The ALPR is to be utilized for official public safety purposes only.
- B. No officer shall utilize any ALPR equipment until they have received the required training.
- C. When operating a vehicle with an ALPR device, ALPR operators shall be guided by Directive 8, “Responsibilities and Functions of the PennComm Center.”
- D. When the ALPR operator receives an alert from the ALPR, the officer shall personally VERIFY that alert data matches the registration plate information exactly, including both the license plate number and the state of issuance. The officer shall then **conduct a CLEAN/PCIC/NCIC check** of the license plate to **verify the status before taking further police action**. (Officers will be guided by UPPD Directive 37, “Vehicle and Pedestrian Investigations”).
- E. When operating a vehicle with an ALPR device, ALPR operators shall be guided by UPPD **Directive 26, “Routine and Emergency Vehicle Operation”**.
- F. The ALPR operator shall be cognizant of the security of the cameras of the ALPR when leaving the vehicle unattended. There is no need to remove the cameras from the patrol vehicle before the vehicle goes through a car wash.

- G. No officer shall tamper with, modify, or attempt to remove the ALPR device. At no time shall officers attempt to repair any of the installed ALPR components. Only personnel authorized by the UPPD ALPR Coordinator are authorized to install and remove the ALPR device.

## **VI. Reporting**

- A. Vehicle stops and investigations related to the use of the ALPR shall be documented utilizing the UPPD Incident Report (UPPD-10), as well as any other necessary documentation utilized to record the ALPR-related incident (Live Stop Report, TVR, PPD 75-48, etc.) Personnel shall be guided by UPPD **Directive 59, "Records"**, when reporting ALPR-related incidents.
- B. The Pennsylvania License Plate Recognition Network (PALPRN) will be the repository for all ALPR transit and statistical data. Access to and dissemination of this data will only be granted through authorized requests made to the PALPRN.
- C. UPPD Personnel shall be cognizant that ALPR data and related information could contain personal identifying information which is protected by the Criminal History Records and Information Act (CHRIA.) All means shall be taken to protect this information from public access.

## **VII. General Information And Responsibilities**

- A. PALPRN ALPR Coordinator

The ALPR Coordinator for the PALPRN shall be designated by the Southeastern Pennsylvania Regional Task Force (SEPARTF), comprised of representatives from the counties of Bucks, Chester, Delaware, Montgomery, and Philadelphia.

- B. University of Pennsylvania Division of Public Safety ALPR Coordinator

The duties of the UPPD ALPR Coordinator shall be assigned by the Chief of Police. These duties shall include:

1. Administer and manage the UPPD ALPR Program;
2. Manage any UPPD administrative functions related to the ALPR system;
3. Liaise with the PPD Research and Planning Unit to update this policy;
4. Approve users for the ALPR system through the UPPD Captain of Patrol.
5. Liaise with the ALPR Coordinator of the PALPRN for the purpose of troubleshooting, training, and documentation of maintenance and repairs on ALPR equipment (software & hardware).

## **VIII. Damaged / Malfunctioning / Vandalized Equipment**

A. Reporting Problems

1. If the ALPR device malfunctions or stops working, the ALPR operator should follow the procedures as outlined in the training curriculum, which includes exiting and restarting the ALPR computer program and/or restarting the MDT.
2. If problem persists, take no further action, notify the ORS and contact the UPPD ALPR Coordinator, via chain of command, with details pertaining to the malfunction.
3. The UPENN ALPR Coordinator shall handle all repair requests.

B. Damage to or Vandalism of ALPR Equipment

1. Vandalized Equipment - A PPD 75-48 and UPPD Incident Report (UPPD-10) shall be prepared providing details of the vandalism.
2. Damaged Equipment - A UPPD Incident Report (UPPD-10) shall be prepared to record incidents of damage to the ALPR that is not related to vandalism.
3. Damage/malfunction/vandalism information will be noted on the UPPD Summary Sheet (UPPD-8) and the Shift Supervisor will prepare and forward a memorandum detailing the circumstances to the Captain of Patrol.
4. The UPPD ALPR Coordinator shall notify the PALPRN ALPR Coordinator of the damage to the equipment so that repairs to this equipment maybe be facilitated.

**IX. Retention / Access / Release**

A. ALPR Data / Scan Retention

1. PALPRN
  - a. ALPR generated data will be retained for a period of one (1) year, unless used in a criminal investigation, in which case the data will be retained in accordance with current UPPD retention schedules.
2. ALPR Car System
  - a. ALPR generated data (not related to alerts) will be retained within the program on the MDT for a period of 30 days.
  - b. ALPR alert data will be retained within the program on the MDT for a period of 60 days.

B. ALPR Data / Scan Access

1. All license plate data/scans shall be stored using a secure means that provides for controlled access (by password or similar secure means), and for automatically recording instances of access, including, but not necessarily limited to date, time, user, and data /scan accessed.

C. ALPR Data / Scan Release

1. ALPR data/scans shall be released, disclosed, disseminated, and/or distributed for purposes of criminal investigation or prosecution by the PALPRN.

**X. Request For Information (RFI)**

A. PALPRN

1. All requests for license tag insertions into the PALPRN system shall be made via email to the ALPR Coordinator at PALPRN. Upon approval, the PALPRN will enter this information into the system.

B. License Tag Query into the PALPRN for Investigations

1. All queries into the PALPRN for investigations of license tags, such as a crime scene query, must be received via email and have the following information in the email request for information:
  - a. UPPD personnel's name, badge #, telephone #, email address, Case#, and reason for the request.

C. Questions concerning Request for Information for the ALPR shall be directed to the PALPRN Coordinator.

**XI. Compliance**

Violations of this directive, or portions thereof, may result in disciplinary action.

**XII. Officers Assigned To Other Agencies**

Officers of this department assigned to or assisting other law enforcement agencies will be guided by this directive.

**XIII. Application**

This directive constitutes department policy, and is not intended to enlarge the employer's or employee's civil or criminal liability in any way. It shall not be construed as the creation of a higher legal standard of safety or care in an evidentiary sense with respect to third party claims insofar as the employer's or employee's legal duty as imposed by law. Violations of policy will only form the basis for departmental administrative sanctions. Violations of law will form the basis for civil and criminal sanctions in a recognized judicial setting.