License Plate Recognition System – Data Collection and Privacy

EWU PARKING AND TRANSPORTATION SERVICES POLICY

JULY 1, 2017

PURPOSE: This policy establishes standards and procedures for the collection, retention and privacy of license plate recognition data at Eastern Washington University (EWU).

1. General

The university uses license plate recognition (LPR) technology to manage parking on the University's Cheney campus and on specific city streets adjacent to the campus. The University's department of Parking and Transportation Services (PTS) and the University Police Department (UPD) use vehicle-mounted systems and/or handheld devices to enforce parking. PTS and UPD personnel shall be properly trained prior to using LPR equipment.

2. Data Collected

The LPR system captures two images of observed vehicles:

- (1) a context image of the vehicle and its immediate surroundings, and
- (2) an image of the license plate.

Images are usually taken of the rear of a vehicle, but an image of the front of a vehicle may be taken when the vehicle is backed into a parking space, parked in a driving aisle, or parked in any other way which provides better visibility of the vehicle's front. Images taken are not of a resolution that allows for identification of vehicle occupants, if any.

Along with the images, the LPR 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 itself does not contain individual parking patron's account information, but may be linked to such information by PTS.

3. Use of Data

The intended use of data collected by the LPR system is for parking access control, parking enforcement and law enforcement investigations. LPR data is used 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. The University Police Department (UPD) shall also have access to parking information for active criminal investigations. Any use of data outside of these stated purposes must be detailed and approved in writing by the Associate Vice President for

Business & Auxiliary Services, and/or the Vice President for Business and Finance of Eastern Washington University.

4. Data Retention

Data collected by the LPR system that does not result in a parking enforcement action and is not part of an ongoing law enforcement investigation shall be purged after 90 days. Data that results in parking enforcement action shall be retained with the citation record according to established University data retention policies. Data associated with an ongoing law enforcement investigation shall be retained with the investigative record according to established University records and retention policies.

5. Access to Records

Access to records created and maintained by the LPR system is restricted to trained PTS and UPD personnel. All personnel with access to the system shall use unique identifiers and passwords to access records and all login activity, record additions, and other activity is logged. Access to the system by others is prohibited.

6. Data Requests by Vehicle Owners

Registered vehicle owners may request a report detailing what, if any, records exist for their vehicle(s) in the EWU LPR system. The report may be requested in person at the Parking Transportation Services office, 101 Tawanka. Cheney, WA 99004. Individuals requesting a report in person must provide sufficient identification to establish their identity as the registered owner of the vehicle. The registered owner's identification must contain the same address as is on file with the Department of Motor Vehicles.

7. Public Notification

PTS will notify the public of its LPR data collection activities and policies by:

- (1) posting a data collection and use statement on the PTS website.
- (2) requiring parking permit buyers to indicate acceptance and understanding of this policy when purchasing a parking permit.