

CORPORATE POLICY



Policy Title: **Licence Plate Recognition Use Policy**
Policy Category: **Administration Policy**
Policy No.: A-019
Department: Community Services
Approval Date: January 16, 2017
Revision Date:
Author: Julie Scott, Steve Ross, Grant Curlew
Attachments:
Related Documents/Legislation: Municipal Freedom of Information and Protection of Privacy Act
Key Word(s):

POLICY STATEMENT:

Municipal Enforcement Services is committed to utilizing technology to provide a more efficient means of enforcing parking permits or time-limited zone rules in a manner less susceptible to dispute and at the same time protecting the privacy of individuals and ensuring that records are collected, retained and disposed of according to the City of Waterloo Retention By-Law and related policies.

PURPOSE:

The purpose of the Policy is to outline how the Licence Plate Recognition (LPR) technology will be configured and to outline the process of collecting, retaining and disposing of records created utilizing this technology in accordance with the *Municipal Freedom of Information and Protection of Privacy Act* (the Act).

DEFINITIONS:

LPR: means the licence plate recognition systems, including all associated software and hardware.

SCOPE:

This policy applies to all information collected, used and retained by the LPR system and all City of Waterloo employees who may have access to such information.

Mandatory Policy, *Municipal Act*: No
Policy Administration Team, Review Date: April 23, 2016
Corporate Management Team, Review Date: June 8, 2016

POLICY COMMUNICATION:

The policy will be posted on the City Website and Intranet. Staff will be advised of the new policy via distribution to the Operational Leadership Team and Corporate Management Team.

POLICY:

All uses of the LPR system must be included in a Privacy Impact Assessment completed by the Legislative Services division prior to the beginning of use. All uses of the LPR system shall be outlined for public information on the City of Waterloo website on a Municipal Enforcement or other relevant page. Other public communication methods may be considered as appropriate when contemplating a new use.

Collection and Use:

Information is collected pursuant to Section 28(2) and 29(1)(g) of the Act for the purposes of law enforcement. The information is collected to supplement a manual process for enforcing time limited parking. It will be operated by a Municipal Law Enforcement Officer (the operator) who has been authorized to use the equipment and has received training on its use including training on personal information and privacy.

A camera positioned on the marked LPR patrol vehicle will capture images of a subject vehicle, its licence plate and potentially the wheel and valve stem. The LPR system will also mark the GPS coordinates of the observed vehicle, the address, date, time, hit time, patroller and location of the vehicle with respect to direction facing closest intersections. The camera will not be adjusted to capture additional information. Any additional personal information collected by the LPR system will not be used and will be deleted or redacted if the photograph is used for further prosecution of the offence.

If a violation is identified the operator will utilize a separate automated ticket issuing device. At no time will the officer have access to any additional owner information through the use of the LPR device other than the Licence Plate number which is visible on the vehicle.

Retention:

At the end of the operator's shift, violation only records will be downloaded to a secure City of Waterloo server via a secure wired or encrypted wireless connection. The device will be configured to automatically delete the records from the onboard mobile computer

after the records have been downloaded. The records downloaded will include the Licence Plate number, date and time of the infraction as well as location of the vehicle. Violation records will be retained according to the City of Waterloo Retention By-Law.

Non-violation records will not be downloaded to the City Server and will automatically be deleted from the onboard system at the end of the officer shift.

Access to personal information:

Violation only records shall be disclosed only to the violator pursuant to the Act through an Access to Information request made through the Legislative Services Division. Violation only records excluding personal information unrelated to the charge will be removed and may be disclosed by legal counsel as required for disclosure in prosecutions in the Provincial Offences Court.

Security:

Information shall be secured at the time of collection via physically locking the patrol vehicle when not attended. In addition the system shall maintain a screen lock that is both timed and capable of being manually set. The LPR Laptop shall remain physically located on a mount in the patrol vehicle and shall be removed from the vehicle when not in use.

The Operator shall be required to log on in a manner that permits their activity to be audited via the security module of the LPR system and log in's shall not be shared between operators.

Information shall be housed on secure City of Waterloo servers using encrypted transfer of information with server back-ups stored only on City of Waterloo servers in a secure environment at a City of Waterloo facility.

Semi-Annual audits of the LPR system shall be undertaken relating to performance and user access and shall be retained according to the Retention By-Law.

The Policy shall be reviewed and revised if necessary if future uses of the LPR system are contemplated.

COMPLIANCE:

In cases of policy violation, the City may investigate and determine appropriate corrective action.