City of Seattle

2020 Surveillance Impact Report Executive Overview

Parking Enforcement Systems (Including ALPR)

Seattle Police Department

City of Seattle

Overview

The Operational Policy statements in this document represent the only allowable uses of the equipment and data collected by this technology.

This Executive Overview documents information about the collection, use, sharing, security and access controls for data that is gathered through Seattle Police Department's (SPD) Parking Enforcement Systems including Automated License Plate Reader (ALPR). All information provided here is contained in the body of the full Surveillance Impact Review (SIR) document but is provided in a condensed format for easier access and consideration.

Note: All use of ALPR as described in this document and the SIR is governed by SPD Policy 16.170

1.0 Technology Description

Parking enforcement ALPR hardware consists of high definition infrared digital cameras that are mounted on three vehicles designated for scofflaw enforcement (these boot vans carry boot devices that can be mounted to immobilize vehicles in violation of scofflaw), and five Parking Enforcement vehicles – for a total of eight ALPR-equipped vehicles that are utilized for Parking Enforcement. The other 39 ticketing vehicles are not equipped with ALPR
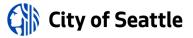
2.0 Purpose

Operational Policies:

> **ALPR systems will only be deployed for official law enforcement purposes. These deployments are limited to:**
> 1. **Locating stolen vehicles;**
> 2. **Locating stolen license plates;**
> 3. **Locating wanted, endangered or missing persons; or those violating protection orders;**
> 4. **Canvassing the area around a crime scene;**
> 5. **Locating vehicles under SCOFFLAW; and**
> 6. **Electronically chalking vehicles for parking enforcement purposes.**

Seattle Police Department (SPD) facilitates the flow of traffic, assists with the collection of revenue related to parking violations in the City of Seattle, and recovers stolen vehicles through a number of means. Among these is Parking Enforcement Systems technology, which is used by SPD as a necessary tool in the following ways:

> 1. Scofflaw – SPD employs three vehicles (two vans, and one truck) with ALPR systems to identify parked vehicles in violation of the City Scofflaw Ordinance. Vehicles in violation are subject to booting, pending payment of past due balances.
>
> 2. Time-Restricted Parking Areas – 47 sedans, 54 scooters, 2 vans, and 1 truck are utilized to monitor time-restricted parking within the City. Five of the sedans are equipped with ALPR systems and operated by civilian employees to digitally "chalk" vehicles parked in time-restricted zones. Utilizing GPS location and stem-valve

comparison technology, the system alerts on those vehicles that are in violation of the time zone restriction upon a second pass. The remaining vehicles are used in traditional pay to park enforcement, and for manually chalking vehicle tires in time-restricted locations.

3. Restricted Parking Zones ("RPZ") means a portion of the street commonly used for vehicular parking where vehicles properly displaying a permit or other authorization are exempt from the posted RPZ. Seattle Department of Transportation provides SPD with a list of vehicles permitted to park in an RPZ. Parking Enforcement Officers may use ALPR to determine that a vehicle does not have the appropriate permit or authorization to park in an RPZ.

4. Parking Enforcement Officers may use ALPR using a list of vehicles reported stolen or sought in connection with criminal investigation to identify those vehicles and report their location to Dispatch.

3.0 Data Collection and Use

Operational Policy:

ALPR technology collects digital images of license plates and associated license plate numbers. The technology collects the date and time that the license plate passes a digital-image site where an ALPR is located.

Data collected from ALPR include license plate image, computer-interpreted read of the license plate number, date, time, and GPS location. ALPR on Parking Enforcement vehicles takes a burst of 26 pictures of each parked vehicle, for visual photo comparison when the same vehicle is later examined for time zone violation.

4.0 Data Minimization & Retention

Operational Policies:

ALPR will not be used to intentionally capture images in private area or areas where a reasonable expectation of privacy exists, nor shall it be used to harass, intimidate or discriminate against any individual or group.

Metadata and images of detections will be deleted from the server within 24 hours of collection.

When the ALPR system registers a hit, the user must verify accuracy before taking any action. In Parking Enforcement, users verify first that a vehicle hit for Scofflaw violation is still actively in violation by checking for updated information in Bootview before booting a vehicle. Parking Enforcement Officers then visually verify that a vehicle suspected of time-zone restriction or metered parking violation is, in fact, in violation prior to issuing a ticket. Images captured serve as "evidence" that the system and the user are not in error.

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Unless a hit has been exported for investigation and exported from the database for this purpose, all data captured by the five ALPR-equipped parking enforcement sedans is retained in the same database as ALPR data collected by ALPR-equipped patrol vehicles and is retained until automatically deleted after 90 days, per department retention policy.

5.0 Access & Security

Operational Policies:

1. **Only Employees Trained in the Use of ALPR Equipment Will Use and Access ALPR Devices and Data**
2. **Employees Accessing ALPR Data Must Login Through the ALPR Password-Protected System**
3. **Employees Conducting Searches in the ALPR System Will Provide a Case Number and Justification for the Search**
4. **Employees Will Not Share ALPR Passwords and Login Credentials**
5. **The Department will store ALPR data in a secured law enforcement facility with multiple layers of security protection. Firewalls, authentication and other reasonable security measures will be utilized. Only trained Department employees can access stored ALPR data and all data search requests are logged within the system.**
6. **ALPR data maintained on BOSS will only be accessed by trained, SPD employees for official law enforcement purposes. This access is limited to:**
   (a) **Search of specific or partial plate(s) and/or vehicle identifiers as related to:**
   (b) **A crime in-progress;**
   (c) **A search of a specific area as it relates to a crime in-progress;**
   (d) **A criminal investigation; or**
   (e) **A search for a wanted person; or**
   (f) **Community caretaking functions such as, locating an endangered or missing person.**
   (g) **Officers/detectives conducting searches in the system will complete the Read Query screen documenting the justification for the search and applicable case number.**
   (h) **Administration and maintenance.**

Access

Prior to gaining access to the ALPR system, potential users must be trained by other trained SPD Parking Enforcement officers. Once this training has been verified with the Parking Enforcement Supervisor, users are given access and must log into the system with unique login and password information whenever they employ the technology. They remain logged into the system the entire time that the ALPR system is in operation. The login is logged and auditable.

Parking Enforcement Officers are assigned the vehicles to use while on-shift, as well as a specific zone to monitor for time-restricted parking violations.

Security

All data collected for Parking Enforcement systems are hosted on City SPD servers and are not accessible by vendors without knowledge and/or permission of City personnel. Only authorized users can access the data collected by ALPR for Parking Enforcement. Also, all activity by users in the AutoVu ALPR system is logged and auditable. Data removed from the system/technology and entered into investigative files is securely input and used on SPD's password-protected network with access limited to authorized SPD personnel.

6.0 Data Sharing and Accuracy

Operational Policy:

> **ALPR data will only be shared with other law enforcement or prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law.**

Unlike some ALPR systems, SPD's systems do not "pool" SPD's ALPR data with that collected by other agencies.

Data obtained from the system may be shared outside SPD with the other agencies, entities, or individuals within legal guidelines or as required by law. Seattle's Scofflaw Ordinance and Traffic Code require that SPD share information with Seattle Municipal Court. Data may be shared without outside entities in connection with criminal prosecutions.

Per City of Seattle's Privacy Statement, outlining commitments to the public about how we collect and manage their data: *We do not sell personal information to third parties for marketing purposes or for their own commercial use.* The full Privacy Statement may be found **here.**

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7.0 Equity Concerns

Operational Policy:

> **ALPR will not be used to intentionally capture images in private area or areas where a reasonable expectation of privacy exists, nor shall it be used to harass, intimidate or discriminate against any individual or group.**

ALPR is content-neutral; it does not identify the race of the driver or the registered owner of the vehicle. To ensure that SPD continues to build trust with community members and increase racial equity, SPD must continue to follow its policy of limiting use of the ALPR cars to strictly routine patrol and use of collected ALPR data to specific criminal investigations or community caretaking functions, as well as limiting access to the ALPR system to authorized SPD personnel. Further, SPD must also continue to audit the system on a regular basis to provide a measure of accountability. In doing so, SPD can mitigate the appearance of disparate treatment of individuals based on factors other than true criminal activity and minimize perceived oversurveillance of areas where historically targeted communities reside or congregate.