UC San Diego
Policy & Procedure Manual

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Automated License Plate Reader Policy
(Police Department)

SCOPE

This policy governs the use of automated license plate readers systems and information (ALPR) by the UC San Diego Police Department (UCSD PD) on any property owned, leased, or controlled by the University of California, San Diego.

POLICY SUMMARY

Enacted to support the campus safety and law enforcement functions, this policy governs the use of ALPRs by UCSD PD.

This policy serves as the usage and privacy policy required by CA Civil Code §§ 1798.90.51 and 1798.90.53 to ensure that the collection, use, maintenance, sharing, and dissemination of ALPR Information is consistent with federal, state, and local law and local practices.

DEFINITIONS

ALPR means ALPR System and Information collectively.

ALPR Information means information or data collected using an ALPR System.

ALPR System means 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.

Authorized Users means the only individuals permitted to install, operate or search within the UCSD PD ALPR System.

Campus ALPR Authority is the UC San Diego campus official who authorizes the operation of ALPR Systems and use of ALPR Information.

Major Change(s) are changes that could have an effect on the privacy of individuals or security or governance of ALPR Systems or Information, including but not limited to changes related to ownership, technology, incidents, modification of scope, uses of AI, laws and regulations, risk assessments, vulnerabilities, or material updates or shifts in technologies.

PD ALPR System(s) is/are the ALPR System(s) procured, used, or accessed by UCSD PD to assist with law enforcement and campus safety functions.

POLICY STATEMENT

UCSD PD may utilize the PD ALPR Systems only as described below.

The policy of UC San Diego is to utilize ALPR technology to capture and store digital license plate data and images while recognizing the established privacy rights of the public and our UC community. All data and images gathered by the ALPR are for the official use of the university for the authorized purposes below (and in the Transportation ALPR Policy PPM 545-5).

I.   **Authorized Purposes**

UCSD PD may only utilize PD ALPR System(s) for:

A. Investigating the following offenses associated with crime against individuals or property:
   a. Gun Violence;
   b. Homicide;
   c. Assault;
   d. Reckless driving, including illegal street racing activity, and
   e. Arson;
B. Identification and recovery of stolen, wanted, or subject of investigation vehicles, including motorized scooters and motorized bicycles, or license plates;
C. Investigating traffic accidents that result in bodily injury, death, or significant damage to property and hit and runs;
D. Assisting human trafficking and missing persons cases including at-risk individuals and Amber and Silver Alerts; and
E. System Security and Maintenance. In addition to periodic audits of the system, UCSD PD and vendor staff and technicians for the system will monitor the ALPR System for performance, reliability, and functionality.

Authorized Users shall not use or allow others to use the equipment or database records for any other purpose (Civil Code § 1798.90.51; Civil Code § 1798.90.53).

Authorized Users must have reasonable suspicion that a criminal offense or traffic offense has occurred before examining collected license plate reader data. Authorized Users shall not examine license plate reader data to the examination to generate reasonable suspicion.

Any other operation of, access to, or use of UCSD PD ALPR Systems or data is unauthorized and may result in disciplinary action under University policies or collective bargaining agreements. All other novel uses of non-anonymized ALPR Information, including for scholarly research, must be 1) consistent with and in compliance with laws, UC policies, and privacy guidelines, and 2) approved in writing by the Campus ALPR Authority and the Information Security and Privacy Council (ISPC) prior to implementation.

II.   **Training**

Authorized Users of the UCSD PD ALPR System must complete the following required trainings:

A. Manufacturer training and certification on the ALPR System;
B. This Policy;
C. UC San Diego Privacy 101 Workshop or Privacy @ UC San Diego training;
D. Annual UC Cyber Security Training Certification; and
E. International Association of Directors of Law Enforcement Standards and Training (IADLST) and California Peace Officer Standards and Training (CA POST) course certifications

III. **Privacy and Security of UCSD PD ALPR System**

Any installation of an ALPR System or new use of ALPR Information must undergo a privacy and security review by the Campus Privacy Office and the Office of Information Assurance, respectively, for

Protection Level 4, as defined by [BFS-IS-3: Electronic Information Security](#), prior to implementation and upon any Major Changes to the system, vendor, or processes for access. The Campus ALPR Authority must ensure that Authorized Users, defined below, use administrative, operational, technical and physical safeguards to protect ALPR information from unauthorized access, use, destruction, modification or disclosure, including the following minimum safeguards:

A. Administrative: Username and password protected access to the ALPR system. Monitoring and auditing usage of database and ALPR Information. Appropriate training and access controls.
B. Physical: Secure storage of computers with access to ALPR Systems and Information. Physical access shall be limited to authorized ALPR users and the Chief of UCSD PD or their designees.
C. Technical: All information will be encrypted in transit and at rest and protected from unauthorized access, use, or disclosure.

IV. Sharing of ALPR Information

Sharing, disclosing, publishing, providing access to, selling, or exchanging of ALPR Information from the UCSD PD ALPR System outside of UCSD PD, Audit Management Advisory Services (AMAS), or dedicated IT staff assigned to UCSD PD is prohibited unless required by law, court order, and/or search warrant. UCSD PD may share date, time, and location of any confirmed matches of ALPR data with other law enforcement agencies related to an ongoing and active investigation. In order to provide such information, Law Enforcement Agencies (LEA) are required to provide a formal request on Department Letterhead, or form provided by UCPD, contact information, associated Case Number, Crime being investigated, requested License Plate Number, and Make/Model/Color of Vehicle; if a confirmed hit is identified, the LEA would be required to provide a Search Warrant to provide a formal printed report from the system. No UCSD PD ALPR database access will be provided to any external law enforcement or immigration enforcement agency, including joint task forces that involve non-UCSD entities, or other government organizations unless required by law, court order, or search warrant, or where there is explicit consent of the data subject(s).

Public access: ALPR Information shall be made public or deemed exempt from public disclosure pursuant to state or federal law. Information related to the maintenance and governance of ALPR Systems and access to ALPR Information shall be available for public disclosure, in accordance with applicable law.

All other disclosures to external entities are expressly prohibited except where required by law.

V. ALPR Information Requirements.

A. Except as described in Responsibilities III b. below, ALPR Information in the UCSD PD ALPR System will be retained for forty-five (45) days and then deleted, unless a court order or legal authority requires otherwise.
B. ALPR Information may be aggregated, anonymized, and kept for traffic reporting and maintenance needs.
C. Accuracy of Data. UCSD PD ALPR data collection is automated such that license plate images and details of collection are included in the system without human review. Although infrequent, license plate translation may be incomplete or inaccurate. Any alert provided by an LPR system is to be considered informational and advisory in nature and requires further verification before action. The UCSD PD Managers, or their designees, will manually review the license plate or plate image to validate the license plate before initiating an investigation into an incident.

RESPONSIBILITIES

I. Implementation and Enforcement

The Vice Chancellor Operations Management and Capital Programs (OMCP) is the Campus ALPR Authority and is responsible for implementing this policy in accordance with California Civil Code 1798.90.51. The VC-OMCP may delegate the role of Campus ALPR Authority, except that duties may not be delegated to Transportation Services or the UC Police Department, but the role may not be further redelegated.

II. Authorized Users

The following are the only Authorized Users of the UCSD PD ALPR System(s) for the following activities:

  A. Installation, operation, and maintenance: Physical Security Program Unit
  B. Search: Dispatchers, Patrol Operations, Specialized Services Division, Physical Security Program Unit
  C. Monitoring, auditing, and oversight: As described below.

All Authorized Users must complete all applicable background checks prior to access to any ALPR System or Information.

III. Auditing and Oversight

A. UCSD PD shall be responsible for storing and monitoring all logins and queries of the UCSD PD ALPR System, as required by CA Civil Code 1798.90.52. At a minimum, the following information must be maintained for every query of the ALPR system: username; the date and time of access, the purpose for the access, and the license plate number or other data element(s) used to query the ALPR System.
B. UC San Diego departments with Authorized Users must conduct periodic monitoring to review access rules, logs, configuration, and to confirm active individual accounts. The Campus ALPR Authority or their designee will periodically monitor querying activity via electronic logs to ensure searches are tied to legitimate transactions and other aforementioned business needs. In accordance with the UCSD Records Retention Schedule, Audit Logs will be retained for 8 years and then destroyed. Records pertaining to pending, foreseeable or ongoing litigation, an investigation, ongoing audit, or a request for records cannot be destroyed until these actions have been completed or resolved. Records pertaining to pending, foreseeable or ongoing litigation, an investigation, ongoing audit, or a request for records will be maintained in accordance with the University's Records Management Program guidelines and instructions from legal counsel.

IV. Contracting

Procurement is responsible for ensuring that ALPR contracts comply with this Policy.

V. Publication and Posting

A. In accordance with CA Civil Code 1798.90.53, the ALPR Policy must be publicly published. The Office of Information Governance and Policy will ensure that this policy is properly posted. The Chief of UCSD PD will ensure that this policy is posted conspicuously on the UCSD PD website.

B. Chief of UCSD PD is responsible for ensuring that a public notice is posted at the entrance(s) of any facility with fixed ALPR cameras associated with UCSD PD.

VI. Violations

Sanctions for violations of this policy may include disciplinary action up to and including termination of employment.

PROCEDURES

None

FORMS

None

RELATED INFORMATION

A. https://police.ucsd.edu/resources/immigration.html

B. https://undoc.universityofcalifornia.edu/

C. CA Civil Code §§ 1798.90.5

D. CA Civil Code §§ 1798.90.51

E. CA Civil Code §§ 1798.90.53

F. CA Civil Code §§ 1798.90.55

G. CA Civil Code § 1798.29(g) (1) (F).

H. University of California PPSM-21 Selection and Appointment

I. UC Protection Level Classification Guide

J. UC Institutional Information Disposal Standard

K. UC San Diego Policy and Procedure Manual PPM 135-3 Network Security

L. UC San Diego Policy and Procedure Manual PPM 545-5 Automated License Plate Reader Policy (Department of Transportation Services)

M. UC Records Retention Schedule

FREQUENTLY ASKED QUESTIONS (FAQ'S)

1. What are ALPRs?

An Automated License Plate Recognition (ALPR or LPR) system is a computer based, information gathering system that utilizes specially designed cameras to rapidly capture an image of a vehicle license plate and recognize the plate characters using optical character recognition technology in addition to make, model, color and speed data. This data can then be searched for in a database.

The ALPR System collects: License plate image capture, license plate number, license plate state, portions of the vehicle and surrounding areas within frame, and the location of the vehicle, date, and time the image was taken ("ALPR Information").

2. How does UCSD PD use ALPRs?

UC San Diego PD uses both mobile and fixed ALPR Systems, which capture and store digital images of license plates in areas visible to the public and use character recognition algorithms to identify and store plate characters. The system creates a searchable computerized database.

UCSD PD utilizes ALPR technology to scan, detect, and identify license plate numbers which appear on a list of license plate numbers and letters that law enforcement agencies use to identify vehicles of interest (Hot Lists). ALPR Systems can be used for locating wanted vehicles and capturing images for criminal investigations and locating stolen vehicles. ALPR data is law enforcement information and will be used solely for law enforcement purposes. Any non-law enforcement usage of UCSD PD ALPR Information is strictly prohibited.

REVISION HISTORY

XX/XX/2025 This policy was originally issued.