

ALPR – TECHNOLOGY

By Hervey Simard, April 16, 2010

TERMINOLOGY

READS – any data the system reads

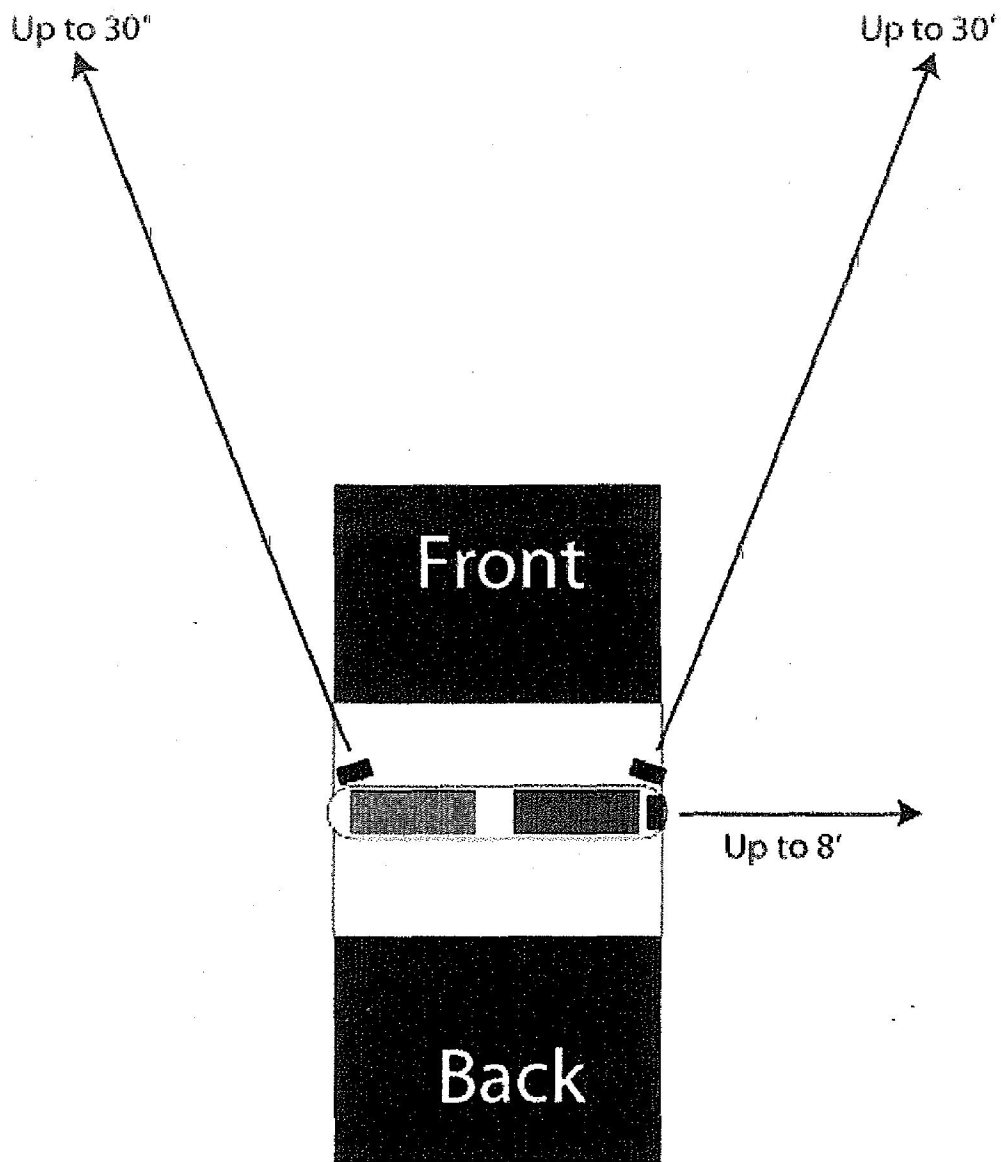
HITS – Actual plate number that generate an alert within the Hot List

HOT LIST – List created by RCMP (expired, warrants (federal & provincial), stolen...)

THE SYSTEM

Radio Works will install a processor in the trunk. The processor is property of VicPD. With the unit comes a GPS antenna mounted on the back of the car.

3 cameras will be installed on the roof. 2 facing the front, 1 facing the right side of the car for parking; (see graphic next page)



2 CAMERAS FACING FRONT AND 1 FACING RIGHT SIDE.

The system is designed to read plates on oncoming and ongoing traffic, up to a max speed of 290km/hr.

ACTUAL PROCESS

1. Processor is setup in the trunk. USB is provided by RCMP with hot list on the computer. The processor takes a black and white photo of the plate. The processor only sees dots and not letters and numbers. The system use OCR program to read the graphic into letters and numbers, with an accuracy of 92-94%.
 - a. The officer will click a button "Begin Shift" on their screen.
 - b. This will trigger the processor to import the Hot List from the USB drive (approx. 10 minutes)
2. When the camera reads a plate (call a "read"), the system will go through all the Hot List. If the plate gets a hit, it will create an alert, and still carry on with the rest of the list. If more than one hit, the system is designed to setup priority levels so warrants hits could be coming on the top of all hits. All done within 1 sec.

For each read and hits, the system will capture:

- Photo
- Latitude & Longitude
- Time & Date

3. When the shift ends, the officer will click on the "End Shift" button on the screen. The processor will delete all "reads", which consist of 95% of data. The officer will bring back the USB which contains only "hits". RCMP will keep that data for 2 years.

If somehow, some reads got moved on the BOS server (Back Office Server), the system is designed to purge them after 1 minute.

Taylor, Debra

From: Warren Nelson <warren.nelson@rcmp-grc.gc.ca>
Sent: Tuesday, April 20, 2010 9:25 AM
To: Taylor, Debra; Derek Wong
Cc: Andrew ISLES; Mike DIACK
Subject: ALPR Expansion
Attachments: E Div. Ops 25.100; Appendix 25-100-1.doc; ALPR Letter 20100331.pdf

Debra & Derek:

I have had some discussions on expanding, and in the case of VPD updating, the use of ALPR to the new PIPS system. The purpose of this email is to capture the essence of our discussions for your consideration in any decision making that may be necessary.

As you are aware the RCMP piloted the introduction of ALPR for police use in BC. This pilot process began in 2006. Prior to conducting the pilot the RCMP contacted the offices of both the Federal and Provincial Privacy Commissioners, firstly to make them aware of the new technology, and secondly to seek their advice/approval for the pilot.

Internally the RCMP required that a Statement of Sensitivity (SOS) and a Threat Risk Assessment (TRA) be completed and submitted prior to the submission of a Privacy Impact Assessment (PIA). A PIA was completed and submitted to the office of the Privacy Commissioner.

VPD has been operating an ALPR Camera equipped vehicle for some time under the "umbrella" of the RCMP in terms of policy, data capture, storage and preservation of data in a back officer server. Daily "hotlists" consisting of 4 databases received from CPIC (licence plates associated to: 1/stolen vehicles, 2. BC Warrants, 3. Canada Wide Warrants and 4. Other Pointer vehicles) AND 3 databases received from ICBC (licence plates associated to: 1. unlicensed/uninsured vehicles, 2. prohibited drivers and 3. unlicensed drivers) have been provided to VPD via email from this office. VPD have returned thumb drives (hand delivered to this office once per week) containing the results of their work for transfer to the back office server. This system of data movement has worked well.

However the recent move to updated ALPR equipment, IE the new PIPS system, along with the requirement that all data moved via thumb drives be encrypted will alter the above process. The RCMP is prepared to continue our ALPR support of the Independent Police Departments.

In the case of VPD, as there is no convenient RCMP from which to do the upload of hotlists, we may be able to email an encrypted "begin shift" folder containing the hotlists in a similar manner as the past. The encrypted thumb drives used to capture the images will still need to be returned to this office once per week for transfer of the data captured (images and text data) to the back officer server for storage and preservation in accordance with the Federal Privacy Act Regulations. The data captured is too large to be accommodated by email.

In the case of VicPD there may be a more personal "work around". Encrypted thumb drives can have the hotlists uploaded directly from the IRSU CRD office. Similarly the encrypted thumb drives used to capture the images can be returned to IRSU CRD office and the data transferred directly to the back office server for storage and preservation.

If you choose to use the RCMP server and support you must have the attached Letter of Agreement signed by your Chief agreeing to follow "E" Division policy on the use of ALPR (copy attached) and the commitment recently made by the RCMP to the Privacy Commissioner (copy attached) that ALPR will only collect and retain primary (hit) data at this time.

Should these methods not be acceptable the alternative would be for each Police Department to complete a PIA, secure their own back officer server and negotiate direct access to the database hotlists from CPIC and ICBC.

Should you have any question or concerns give me a call our address them with OIC "E" Division Traffic Services.

Warren

Warren Nelson

Special Projects Coordinator

RCMP "E" Division Traffic Services HQ, 306C 20338 - 65th Ave., Langley, BC V2Y 2X3 Phone: 604 539-2708 Cell 604 790-4974 "Dedicated to Improving Public Safety on our Roadways"

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"E" Division Traffic Services HQ.
306C-20338 65th Avenue
Langley, BC V2Y 2X3

Your File Votre référence

Chantal Bernier
Assistant Privacy Commissioner
112 Kent Street, Third Floor
Ottawa, Ontario K1A 1H3

Our File Notre référence

2010-03-30

Dear Madam Bernier:

Automatic License Plate Recognition (ALPR) program

The purpose of this letter is to introduce myself and to notify you of the conclusion of the "pilot program" stage of the RCMP Automatic License Plate Recognition (ALPR) program in British Columbia.

On January 4, 2010, I replaced Supt. Norm Gaumont as the Officer in Charge of "E" Division Traffic Services and I am now responsible and accountable for the RCMP ALPR program in British Columbia. In 2005, as the Officer in Charge of the Integrated Municipal Provincial Auto Crime Team (IMPACT), I introduced ALPR to policing in British Columbia. I therefore possess considerable knowledge and experience with Automatic License Plate Recognition.

On January 15, 2010, I participated in the teleconference with you, Supt. Gaumont, Kyle Friesen (Legal Advisory Section - RCMP Pacific Region, Department of Justice Canada), and others. I appreciate your support of ALPR as an effective policing tool and understand your privacy concerns regarding retention of secondary (non-hit) data. I remain committed to our agreement to retain only primary (hit) data on RCMP controlled ALPR systems in British Columbia. At the same time, the RCMP recognizes that the reasonable expectation of privacy for secondary data is very low where ALPR observes vehicle license plates in public places using carefully-restricted systems that collect minimal data and retain it for short periods. As you know, ALPR is not being used as a general surveillance tool for highways and public places in British Columbia. Instead, ALPR extends the vision of police in observing what is already visible to the public. The degree of invasion of privacy for drivers and passengers is minimal, particularly if they are innocent passers-by whose images are briefly observed when they drive past an ALPR vehicle.

Recently the RCMP replaced all ALPR systems in British Columbia (the Vancouver Police Department has one ALPR unit) with new PIPS technology which is built by the manufacturer to collect and store primary (hit) and secondary (non-hit) data. I have instructed the manufacturer to reconfigure our ALPR systems to collect only primary hit data. The manufacturer indicates that this will take approximately 4-6 weeks because the RCMP is the first organization in the world to request that its ALPR system not collect secondary data. As an interim solution our RCMP IT specialists have reconfigured our servers so that secondary (non-hit) data cannot be retained by the RCMP.


In summary:

- * our new PIPS ALPR systems currently collect secondary (non-hit) data;
- * our internal systems do not allow the RCMP to retain this collected secondary data;
- * by April our ALPR systems will no longer collect or retain secondary data; and,
- * the RCMP has committed that secondary (non-hit) ALPR data will not be retained on any RCMP-controlled ALPR system without your prior consultation.

I have contracted Darryl Plecas Ph.D. and his staff at the University of the Fraser Valley in British Columbia to conduct a review of police ALPR systems throughout the world. We seek empirical evidence to support our belief that secondary (non-hit) data should be retained for operational policing because of its value to law enforcement investigations and the protection of public safety. I will share this report with you when the RCMP receives it in late May 2010.

I am confident that we have addressed your concerns regarding retention of secondary (non-hit) data and met our agreement to retain only primary (hit) data. I look forward to your views on our decision to conclude the pilot program of the RCMP ALPR program in British Columbia. In our view, the RCMP and the public will benefit from implementing ALPR as a police enforcement and interdiction program in British Columbia, with the maximum level of privacy protection for secondary data.

Sincerely,



Insp. Mike DIACK
Officer in Charge
"E" Division Traffic Services

306C-20338 65th Avenue
Langley, BC V2Y 2X3

Phone: 604-539-2717
E-mail: Mike.Diack@rcmp-grc.gc.ca

“E” Division Traffic Services

Automatic License Plate Recognition (ALPR) Program’s Terms and Conditions For Participation within a Policing Jurisdiction

General

1. “E” Division Traffic Services is responsible for overseeing and managing the ALPR program, purchasing and assigning of equipment, developing Division policy, maintaining ALPR equipment and vehicles, storing and sharing ALPR information.
2. Automatic License Plate Recognition (ALPR) consists of cameras mounted in or on mobile or stationary police vehicles that capture images of vehicle license plates and instantly check the license plates against an onboard database.
3. The onboard database is currently limited to:
 - **Stolen licence plates/Licence plates associated to stolen vehicles**
 - **Licence plates associated to Warrants (Canada Wide)**
 - **Licence plates associated to Warrants (BC Wide)**
 - **Licence plates associated to other pointer vehicles**
 - **Licence plates associated to prohibited drivers**
 - **Licence plates associated to unlicensed drivers**
 - **Licence plates associated to uninsured vehicles**
4. ALPR cameras can capture and analyze up to 3,000 vehicle license plates per hour at speeds up to 240 km/h.
5. ALPR cameras photograph and store images of moving and stationary licensed plates and vehicles and in ideal circumstances, such as daylight and good weather, ALPR images can show the driver or occupants.
6. ALPR photograph images and data are classified as “Protected A” and are stored on a secure server.
7. ALPR photograph images and data related to database hits are retained for 2 years as required by the Federal Privacy Act.
8. ALPR photograph images and data not related to database hits are not retained.

Responsibilities of Participating Jurisdiction

1. Police agencies requesting the use of "E" Division Traffic Services ALPR equipment, or using their own ALPR equipment with RCMP support, will sign a Letter of Agreement with the "E" Division Traffic Services and will ensure ALPR is used consistent with RCMP policy, **"E" Division Operational Manual Part 25 Investigative Aids, Chapter 25.100 Automatic License Plate Recognition (ALPR) and LMD Supplements, Part 25 Investigative Aids, Chapter 25.100 Automatic License Plate Recognition (ALPR).**
2. Police Agencies using ALPR equipment shall not access ALPR data nor store ALPR data or images on any system other than as directed by RCMP policy.

Request for Searches of the ALPR database

1. All requests for ALPR database searches to further a legitimate police investigation **MUST** be submitted to the "E" Division Traffic Services ALPR Coordinator via **ROSS** (warren.nelson@rcmp-grc.gc.ca), or by the submission of **form ED625 - ICS** as per **"E" Division Operational Manual 1.3.I.8.b.2.1.**, and must include the investigator's name, the file number, the license plate to be searched as well as the reasons for the search.

UNDERTAKING BY CHIEF

I, _____, have read and agree to fully implement, with my agency, the program procedures as noted in this document. I also realize that I can end my agency's participation in the program at any time by written notification to the OIC "E" Division Traffic Services.

(Signature)

Date

5.100 Automatic Licence Plate Recognition (ALPR)

1. General
2. ALPR Equipment
3. ALPR Operator
4. ALPR Data Collection, Storage and Retention
5. Release of ALPR Information
6. Requests of Searches of the ALPR Databases

Related Links

Appendix: 25-100-1 ALPR's Terms and Conditions for Participation Within a Policing Jurisdiction

(Originator: OIC "E" Division Traffic Services)

1. **General**
 1. Automatic Licence Plate Recognition (ALPR) is an investigative aid that can significantly improve road safety, significantly reduce property crime, increase patrol efficiency and increase detection rates of target plates.
 2. ALPR cameras photograph and store licence plate images from moving and stationary vehicles.
 3. The ALPR computer compares the licence plate images with national and provincial databases for enforcement purposes.
 1. The following approved enforcement databases are loaded into the system (Target Database):
 1. Stolen Vehicles (CPIC);
 2. Licence plates associated to:
 1. Canada-Wide Warrants (CPIC);
 2. BC-Wide Warrants (CPIC);
 3. Other Pointer Vehicles (CPIC);
 3. **Note:** This database is included for information and police and public safety reasons only, see line 3.3. below.
 4. Prohibited/Suspended Drivers (ICBC Driver/Vehicle Database);
 5. Uninsured Vehicles (ICBC Driver/Vehicle Database), and;
 6. Unlicensed Drivers (ICBC Driver/Vehicle Database).
 4. ALPR equipment is installed in marked or covert vehicles, both with mobile and stationary capabilities.
 5. ALPR is approved for the prevention and detection of stolen vehicles, detection of provincial traffic violations, and is effective for all types of criminal investigations where a vehicle link is possible/probable.
 6. The OIC "E" Division Traffic Services is responsible for the ALPR program.
2. **ALPR Equipment**
 1. All equipment purchases/implementation must be approved by the OIC "E" Division Traffic Services. Contact the ALPR Coordinator, "E" Division Traffic Services, at 604-539-2708.
 2. There are currently three covert vehicles for use by units/detachments. Direct requests to the ALPR Coordinator.
 3. Ensure a Letter of Agreement regarding ALPR (Appendix 25-100-1) is signed when personnel from other police agencies are using this equipment.
3. **ALPR Operator**
 1. Download the CPIC and ICBC Driver/Vehicle databases to the onboard computer system at the start of each shift.
 1. Enter appropriate individual licence plates associated to an Amber Alert into the target database when broadcast by an OCC.
 2. The ALPR database is neither live to CPIC nor ICBC and is therefore most accurate when you download data from CPIC or ICBC Driver/Vehicle Database.
 2. Prior to taking enforcement action, confirm all:
 1. ALPR database hits with CPIC/ICBC.
 2. Possible hits resulting from a CPIC query with the originating agency.
 3. Prior to arranging interception of a vehicle listed on the Other Pointer Vehicles (CPIC) database ensure there are valid grounds for conducting a vehicle check; i.e., the driver has committed an infraction; the registered owner is in violation of the Motor Vehicle Act as it relates to his/her status of the driver's licence or vehicle registration, etc.
 4. Members operating covert ALPR vehicles must:
 1. not stop, or attempt to stop, a vehicle or person.
 2. not use the vehicle to close the distance, initiate or join any Emergency Vehicle Operation (Pursuit). See "E" OM 5.4. EVO.
 3. ensure that the vehicle is stored in a secured parking facility when not in use.
4. **ALPR Data Collection, Storage and Retention**
 1. Refer to "E" OM 16.4. Closed Circuit Video Equipment (CCVE).
 2. ALPR photograph images and data are classified as Protected A and are stored on a secure server.
 3. Data from the ALPR vehicles must be uploaded to the secure server at least once per week.

5. **Release of ALPR Information**

5. 1. Data and statistics will not be released to the media or public without the prior permission of the OIC "E" Division Traffic Services. Refer to "E" OM 1.3.1. Assistance—Release of Information, and HQ Admin Man. III.11. Information Access.
5. 2. Direct all ALPR media enquiries to:
 5. 2. 1. the IMPACT Media Relations officer for IMPACT related enquiries; or
 5. 2. 2. all remaining enquiries to the Media Relations office at "E" Division Traffic Services.
5. 2. 3. See "E" OM Part 27 Media.
6. **Requests of Searches of the ALPR Databases**
6. 1. Submit requests for ALPR database searches to the ALPR Coordinator via ROSS, or by the submission of ICS form ED625 per "E" Div. OM 1.3.1.8. Disclosing Personal Information Within the RCMP.
6. 1. 2. Include the investigator's name, home unit/detachment, file number, the licence plate number to be searched, and reason.

References.

- "E" OM 5.4—EVO HQ
 - OM 16.4. Closed Circuit Video Equipment
 - "E" OM 1.3.1. Assistance—Release of Information
 - HQ Admin Man. III.11. Information Access
 - "E" OM Part 27 Media
 - ICS form ED625
 - "E" Div. OM 1.3.1.8. Disclosing Personal Information Within the RCMP
-

 Amended: 2009-09-11
Important Notices

Taylor, Debra

From: Taylor, Debra
Sent: April 20, 2010 9:49 AM
To: Simard, Hervey
Cc: Naughton, Bill; Seivewright, Scott
Subject: FW: ALPR Expansion

Importance: High

Attachments: E Div. Ops 25.100; Appendix 25-100-1.doc; ALPR Letter 20100331.pdf



E Div. Ops 25.100
(88 KB)



Appendix



ALPR Letter

25-100-1.doc (34 KB) 20100331.pdf (661 KB)

Hi Hervey,

I received the following from Warren. I have confirmed with the OPIC office that we will be following the same principles/process as outlined in the RCMP Pilot project with respect to managing the personal information. I will be forwarding them a letter confirming the same.

However, it would appear that that the logistics need to be ironed out. I'm not sure who is managing this project but they should be advised the following.

Debra Taylor, Manager
Victoria Police Department
Information and Privacy Section
850 Caledonia Avenue
Victoria BC V8T 5J8
Tel: (250) 995-7289

-----Original Message-----

From: Warren Nelson [mailto:warren.nelson@rcmp-grc.gc.ca]
Sent: April 20, 2010 9:25 AM
To: Taylor, Debra; Derek Wong
Cc: Andrew ISLES; Mike DIACK
Subject: ALPR Expansion

Debra & Derek:

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drivers) have been provided to VPD via email from this office. VPD have returned thumb drives (hand delivered to this office once per week) containing the results of their work for transfer to the back office server. This system of data movement has worked well.

However the recent move to updated ALPR equipment, IE the new PIPS system, along with the requirement that all data moved via thumb drives be encrypted will alter the above process. The RCMP is prepared to continue our ALPR support of the Independent Police Departments.

In the case of VPD, as there is no convenient RCMP from which to do the upload of hotlists, we may be able to email an encrypted "begin shift" folder containing the hotlists in a similar manner as the past. The encrypted thumb drives used to capture the images will still need to be returned to this office once per week for transfer of the data captured (images and text data) to the back officer server for storage and preservation in accordance with the Federal Privacy Act Regulations. The data captured is too large to be accommodated by email.

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If you choose to use the RCMP server and support you must have the attached Letter of Agreement signed by your Chief agreeing to follow "E" Division policy on the use of ALPR (copy attached) and the commitment recently made by the RCMP to the Privacy Commissioner (copy attached) that ALPR will only collect and retain primary (hit) data at this time.

Should these methods not be acceptable the alternative would be for each Police Department to complete a PIA, secure their own back officer server and negotiate direct access to the database hotlists from CPIC and ICBC.

Should you have any question or concerns give me a call our address them with OIC "E" Division Traffic Services.

Warren

Warren Nelson
Special Projects Coordinator
RCMP "E" Division Traffic Services HQ, 306C 20338 - 65th Ave., Langley, BC V2Y 2X3 Phone
604 539-2708 Cell 604 790-4974 "Dedicated to Improving Public Safety on our Roadways"

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Taylor, Debra

From: Ing, Steve
Sent: May 13, 2010 3:44 PM
To: Taylor, Debra
Subject: FW: Automatic Licence Plate Reader Training

Hi Deb,

Just checking to see if you were consulted at all about the ALPR project. JD thought he recalled some possible FOI concerns, but wasn't sure. I know that this device is being used in other BC jurisdictions, so I'm sure the FOI aspects have at least been discussed.

Thanks ... Steve

-----Original Message-----

From: Fairburn, Darrell
Sent: Thursday, May 13, 2010 10:04 AM
To: !USD Supervisors; Manak, Del; Pearce, Jamie
Subject: Automatic Licence Plate Reader Training

On May 25th the first new Charger will roll out for duty. Among the many improvements, this unit will be equipped with the Automatic Licence Plate Reading (ALPR) system.

This system is capable of running upwards of 3,500 licence plates in a twelve hour shift. These plates are then compared to a data base that lists;

1. Unlicensed drivers
2. Prohibited drivers
3. Uninsured vehicles
4. BC arrest warrants
5. Canada wide arrest warrants
6. Stolen vehicles/plates/decals
7. Pointer persons of special interest, ie; multiple 24 hour prohibitions or armed and dangerous.

In order to effectively utilize the system please identify members from each Patrol shift and the Traffic unit to attend the training dates listed below. The training should only take 60-90 minutes and will be held in the briefing room. One session is scheduled to coincide with each shift for on-duty members to attend.

Start time: 08:30 for all dates.

A Watch - May 21
B Watch - May 31
C Watch - May 18
D Watch - May 19

The ALPR is on loan and the purpose of it being in the vehicle is for testing and evaluation. The members identified to operate the system should understand that they will be expected to document its use and be willing to address Senior Management and/or the Police Board regarding it's potential effectiveness.

For B Watch, we will try to schedule an earlier training date but it does not appear likely.

Class size is limited but more dates will be made available later. So, submit your top candidates names to me with the chosen date for their attendance. Once all the names are in, I will respond to confirm their placement.

Obviously, the potential for the ALPR to increase productivity is massive. I look forward to both the Patrol and Traffic sections working together to realize that potential and

demonstrate how the ALPR will benefit our members on the street.
Should you have any questions, please feel free to contact me.

Sincerely,

Darrell Fairburn

The Victoria Police Department

A Policeman

Taylor, Debra

From: Taylor, Debra
Sent: May 13, 2010 4:44 PM
To: Hamilton, Grant; Perry, Darlene; Ducker, John; Fairburn, Darrell; Manak, Del; Pearce, Jamie; Ing, Steve
Subject: RE: Automatic License Plate Reader Training

I advised the BC OIPC in April that our Department would be participating in this program.

The privacy concerns were addressed with the Federal Privacy Commissioner's Office by RCMP "E" Division. Representatives from the BC OIPC were involved in discussions with Police Services and the Federal Privacy Office and they were in agreement that this program met the BC FOIPPA requirements provided (non-hit) data was not collected and retained, and the security measures were in place as outlined by the RCMP. Of course, if their office received a privacy complaint in relation to this program they would be required to conduct an investigation.

I will be following up with a letter to the BC OIPC outlining our involvement with this RCMP initiative.

Darlene,

Warren Nelson, Special Projects Coordinator with the RCMP has had numerous conversations with OIC Parent, CPIC Program and Policy Director regarding this program, so I believe they have been briefed since its inception. Recently, CPIC expanded the data bases to include, Canada Wide/BC warrants and pointer vehicles. If you require Mr. Nelson's contact info I can provide it.

Debra Taylor, Manager
Victoria Police Department
Information and Privacy Section
850 Caledonia Avenue
Victoria BC V8T 5J8
Tel: (250) 995-7289

-----Original Message-----

From: Hamilton, Grant
Sent: May 13, 2010 3:19 PM
To: Perry, Darlene; Ducker, John; Fairburn, Darrell; Manak, Del; Pearce, Jamie; Ing, Steve
Cc: Taylor, Debra
Subject: RE: Automatic License Plate Reader Training

I've forwarded this to Deb for a response as she has already been in contact with the Privacy Commissioner's office. I understand the FOI concerns are minimal.

Grant

-----Original Message-----

From: Perry, Darlene
Sent: Thursday, May 13, 2010 3:09 PM
To: Ducker, John; Fairburn, Darrell; Manak, Del; Pearce, Jamie; Ing, Steve; Hamilton, Grant
Subject: RE: Automatic License Plate Reader Training

Hi John,

I can't answer about the FOI concerns, however under the CPI Centre mandate it stipulates we are to submit for approval for this project. I am happy to do this but I will require a summary Darrell in how this is working for us. As it is using data from CPIC this is why the approval is required.

If possible we should include the Records and Comms staff in an overview of this project. It will regenerate increased work for them on confirmations of hits received, so any overview they can receive would be beneficial. IT would also benefit from knowing how this is working as well.

Just a reminder that the Comms staff are going through a CAD upgrade next week, so things are going to be a little more challenging for them for the next couple of weeks as well.

Thanks everyone.

Darlene Perry
Director, Information Management Division Victoria Police Department
(250) 995-7408
vi5001@vicpd.ca

-----Original Message-----

From: Ducker, John
Sent: Thursday, May 13, 2010 2:44 PM
To: Fairburn, Darrell; Manak, Del; Pearce, Jamie; Ing, Steve; Perry, Darlene; Hamilton, Grant
Subject: RE: Automatic Licence Plate Reader Training

I recall some kind of discussion around this a few months ago where there was perhaps an FOI or civil liberties concern about their use. Are we good to go in that regard?

JD

-----Original Message-----

From: Fairburn, Darrell
Sent: Thursday, May 13, 2010 10:04 AM
To: USD Supervisors; Manak, Del; Pearce, Jamie
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Should you have any questions, please feel free to contact me.

Sincerely,

Darrell Fairburn

The Victoria Police Department

A Policeman

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Taylor, Debra

From: Ing, Steve
Sent: June 2, 2010 3:44 PM
To: Taylor, Debra
Subject: FW: ALPR Trial Period

Hey Deb ... meant to copy you on this.

Steve

From: Ing, Steve
Sent: Wednesday, June 02, 2010 3:43 PM
To: Simard, Hervey
Subject: ALPR Trial Period

Hi Hervey,

We have the ALPR scheduled for the trial/testing run until the end of September (2010).

Thanks for checking ... Steve

Taylor, Debra

From: Warren Nelson [warren.nelson@rcmp-grc.gc.ca]
Sent: June 2, 2010 4:23 PM
To: Taylor, Debra
Subject: Re: ALPR System

Debra::

In accordance with our written commitment to the Federal Privacy Commissioner dated 10-03-30, a copy of which I forwarded to you on 10-04-29, we (the RCMP) have installed a purge program so all secondary (non-hit data) is purged on transfer to the server. The vendor PIPS Technology has built, at our request, an auto purge feature for all secondary (non-hit) data into their new Back Office Server Software (BOSS 3) thus retaining only primary (hit) data. We will be installing that program tomorrow to test and ensure it purges as requested, and as our temporary program is currently doing.

I hope that addresses your concern.

Warren

Warren Nelson
Special Projects Coordinator
RCMP "E" Division Traffic Services HQ, 306C 20338 - 65th Ave., Langley, BC V2Y 2X3 Phone 604 539-2708 Cell 604 790-4974 "Dedicated to Improving Public Safety on our Roadways"

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>>> "Taylor, Debra" <vi50959@vicpd.ca> 10/06/01 17:15 >>>
Hi Warren,

I am in the process of writing the BC Privacy Commissioner's office advising them of our involvement with your program. Can you confirm if the PIPS technology has been modified to only collect the primary (hit) data and not the secondary data?

Thanks

Debra Taylor, Manager

Victoria Police Department

Information and Privacy Section

850 Caledonia Avenue

Victoria BC V8T 5J8

Tel: (250) 995-7289

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Taylor, Debra

From: Simard, Hervey
Sent: June 10, 2010 8:33 AM
To: Taylor, Debra; Hamilton, Grant
Subject: RE: Document6 (3).doc

Just got an email from Glenn Vermette and looks like they are starting their program training next Wed. That would be the start time and date for your letter!

Hervey Simard | Web/Media Analyst
Victoria Police Department
phone 250-995-7423
email vi50675@vicpd.ca

From: Taylor, Debra
Sent: Thursday, June 10, 2010 8:30 AM
To: Hamilton, Grant; Simard, Hervey
Subject: Document6 (3).doc

Hi Guys,

Here is an updated draft.... I would like to send this to the OIPC soon. Could you please let me know the start date of the program and any changes/corrections to what I have stated.

Thank you.

Deb

Taylor, Debra

From: Pearce, Jamie
Sent: June 11, 2010 1:40 PM
To: Taylor, Debra; Hamilton, Grant; Vermette, Glenn
Cc: Craig, John
Subject: RE: ALPR Roll Out

Hi Deb,

Sorry for the delay the letter looks great, please send it forward.

Jamie

From: Taylor, Debra
Sent: Thursday, June 10, 2010 1:05 PM
To: Pearce, Jamie; Hamilton, Grant; Vermette, Glenn
Cc: Craig, John
Subject: RE: ALPR Roll Out
Importance: High

Hi Jamie,

The OIPC is aware that that we will be participating in the ALPR program. The privacy concerns have been resolved with respect to the "secondary data", and the attached letter will be forwarded to the OIPC unless the parameters of the project have changed. I understand the policy is being drafted, however I have not seen it.

I can send this out today, just let me know.

Deb

Debra Taylor, Manager
Victoria Police Department
Information and Privacy Section
850 Caledonia Avenue
Victoria BC V8T 5J8
Tel: (250) 995-7289

From: Pearce, Jamie
Sent: June 10, 2010 11:26 AM
To: Hamilton, Grant; Vermette, Glenn; Taylor, Debra
Cc: Craig, John
Subject: RE: ALPR Roll Out

We can perhaps hold off in the announcement if necessary and all the pieces are in place. I was under the impression that the FOI concerns were all covered off with the ALPR.

Deb- are you able to confirm that the FOI issues are resolved and Privacy Commission are is aware of our testing of the ALPR?

From: Hamilton, Grant
Sent: Thursday, June 10, 2010 11:07 AM
To: Vermette, Glenn

Cc: Pearce, Jamie; Craig, John
Subject: Re: ALPR Roll Out

Hi Glenn, are the RCMP planning anything with the media? Before we start using this we should ensure there is a good public messaging piece. Also, I'm not sure our policy is done in regards to how this will be used and how the information will be stored, accessed etc. I also know FOI is still drafting a letter to the privacy commissioner about the pilot project.

What's the rush on this?

Grant
Grant

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From: Vermette, Glenn
To: Hamilton, Grant
Cc: Pearce, Jamie; Craig, John
Sent: Thu Jun 10 09:48:38 2010
Subject: ALPR Roll Out

Hi Grant,

I don't know if you've done anything in the media about the ALPR yet, but it will be operational and in use by Wednesday afternoon next week.

Perhaps when you do it, it may be helpful to mention that plate offences are something that will be very much enforced, and more so than it ever has been in the past.

Sgt. Glenn Vermette
Focused Enforcement Team
NCO i/c Traffic Enforcement Section
Victoria Police Department
850 Caledonia Avenue
Victoria, BC
V8T 5J8
Phone: (250) 995-7284
Email: glenn.vermette@vicpd.ca



June 14, 2010

Catherine Tully, Executive Director
Office of the Information and Privacy Commissioner
PO Box 9038, Stn Prov Govt
Victoria BC V8W 9A4

Dear Ms. Tully:

Re: Automatic License Plate Recognition (ALPR) Program

Further to our telephone discussion on April 19, 2010 regarding the ALPR Program, I am now notifying your office that the Victoria Police Department will be conducting a "pilot program" in union with the Royal Canadian Mounted Police (RCMP), "E" Division Traffic Services. It is expected that the program will commence on June 17, and conclude on September 30, 2010.

As you know, ALPR will not be used for general surveillance rather as a tool that extends the vision of police in observing what is already visible to the public. As we discussed, the Victoria Police Department will be following the same principles and processes as outlined in the RCMP program with respect to the use of the technology.

We appreciate your support of the ALPR as an effective policing tool and understand your privacy concerns regarding the retention of the secondary (non-hit) data. In March of 2010 the RCMP instructed the manufacturer of the PIPS technology for the ALPR systems to reconfigure the systems to ensure that only primary (hit) data would be collected and stored. I have confirmed with their agency that the technology now has an auto purge feature for all secondary data, thus retaining only primary data.

The Victoria Police Department is in the process of developing an internal policy to govern the use of the technology and to clarify the procedures with respect to the use, security, access and retention of the personal information collected to comply with the requirements of the *Freedom of Information and Protection of Privacy Act*.

-2-

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www.vicpd.ca

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It is expected that the Victoria Police Department and the public will benefit from implementing the ALPR as a law enforcement and public safety program, with the privacy protection in position for the secondary data.

If you have any questions or concerns please, do not hesitate to contact me directly at 250 995-7289.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Taylor', with a large, stylized flourish extending from the end.

Debra Taylor, Manager
Information and Privacy

c. Insp. Jamie Pearce
OIC, Focused Enforcement Team



June 24, 2010

Debra Taylor
Manager, Information & Privacy
Victoria Police Department
850 Caledonia Street
VICTORIA BC V8T 5J8

Dear Debra Taylor:

Victoria Police Department – Automated License Plate Recognition Program (ALPR) OIPC File F10-42554

Thank you for your letter of June 14, 2010 advising us of the Victoria Police Department's plan to undertake a pilot ALPR program. Consistent with our *Policy Consultations with the OIPC*¹ policy, we have not taken any position in support of or in opposition to the ALPR. We have, however, raised concerns with the ALPR as it was presented to us.

I thought it might be helpful to repeat some of those concerns here as you begin your evaluation of the ALPR, understanding of course, that the Victoria Police Department's implementation and approach may be different. I would appreciate receiving a draft copy of the proposed policy which sounds like it will, in essence, be a privacy impact assessment. If you have a separate privacy impact assessment document, I would also appreciate receiving a copy of that document.

Defining "Personal Information"

There was some suggestion in our earlier consultations that no personal information is entered into the ALPR. "Personal information" includes recorded information about an identifiable individual. The ALPR will indeed contain personal information in the form of the licence plate number, associated alerts and of course, the photograph of the vehicle which may contain a recognizable photograph of the driver. The program along with related administrative and law enforcement activities which follow are subject to the provisions of the *Freedom of Information and Protection of Privacy Act* ("FIPPA") and should be managed accordingly.

¹ Available at:

http://www.oipc.bc.ca/images/stories/pdfs/Policy/OIPC_PolicyonConsultations%28April2009%29.pdf

(MVA, licensing, etc)

also regulatory offence
enforcement**Scope of Collection of Personal Information**

I understand that the ALPR program photographs every license plate of cars moving and parked whether or not there is any reason to think a crime has or is being committed. In the RCMP implementation of the ALPR they provided a list of proposed alerts. Some of those alerts resulted in a scope of collection that caused us some concern in terms of whether or not the collection was authorized. I understood that our federal colleagues were satisfied that the collection was authorized under the *Privacy Act*. However, the relevant *Privacy Act* provision (section 4) is different from section 26 of FIPPA and so the question of the authorization for the scope of collection is not settled under FIPPA. I'm not certain if the Victoria Police Department plans to use the same list of alerts. We will look forward to being provided with a list of the proposed alerts and an explanation for the rationale for the collection.

Retention of Data

You are correct in identifying retention of non-hit data as a significant issue. I understand from your letter that the non-hit data will be immediately deleted from the system. I look forward to being advised of the Victoria Police Department's plans and rationale for retention of the remaining data.

Secondary Uses

A fourth issue of concern with respect to the ALPR is potential secondary uses of the data. A detailed explanation for any proposed secondary use of personal information gathered with an evaluation of the authorities for such further use or disclosure under FIPPA would be necessary to ensure compliance with FIPPA.

Thank you for providing us with notice of your planned pilot implementation of the ALPR and we look forward to reviewing and commenting on the detailed plans and policies as they become available.

Sincerely,

Catherine Tully
A/Executive Director

Taylor, Debra

From: Vermette, Glenn
Sent: July 13, 2010 7:22 PM
To: Taylor, Debra; Craig, John; Ayers, John
Cc: Ing, Steve; Pearce, Jamie; Hamilton, Grant; Ducker, John
Subject: RE: ALPR Pilot Program

Hi Debra,

All of these questions, other than our internal policy, can be answered by Warren NELSON, the BC ALPR Coordinator for the RCMP.

We get our daily data, and return any data captured, directly back to CRD-IRSU who administers the ALPR Program. We operate under the IDENTICAL model that CRD-IRSU does.

I think I have the answers to most of these questions, however to be sure, Warren will be able to answer them better than me. He can be reached directly at 604-539-2708.

We do not deviate at all from the parameters that CRD-IRSU already has in place, and in fact it would be impossible for us to do so.

Also, to clarify, we (the VicPD) do not retain ANY data whatsoever regarding the ALPR, nor do we have direct access to the data that is loaded daily on the USB sticks that run on the ALPR program. We retain absolutely NOTHING in the way of data, images, scans, NOTHING. Everyday our captured data is returned to the RCMP via encrypted data stick and they input it back into their system.

Hope this helps.

Sgt. Glenn Vermette
Focused Enforcement Team
NCO i/c Traffic Enforcement Section
Victoria Police Department
850 Caledonia Avenue
Victoria, BC
V8T 5J8
Phone: (250) 995-7284
Email: glenn.vermette@vicpd.ca

From: Taylor, Debra
Sent: Tue 7/13/2010 2:03 PM
To: Craig, John; Vermette, Glenn; Ayers, John
Cc: Ing, Steve; Pearce, Jamie; Hamilton, Grant
Subject: ALPR Pilot Program

Hello,

On June 14, 2010 I notified the Privacy Commissioner's Office on the Department's plan to undertake a pilot ALPR program in union with the RCMP, Traffic Services. I reiterated that the Victoria Police Dept. would be following the same principles and processes as outlined in the RCMP program (which their office is familiar with) with respect to the use of the technology, and the management of personal information collected.

Recently, I received correspondence from the Commissioner's Office indicating that they had concerns with the ALPR as it was presented to them by the RCMP.

I require confirmation on the following in order to respond to their concerns:

- What is the scope of the collection of personal information?
(A list of what information is captured and a list of the proposed alerts would be helpful)
- What is the retention period for personal data collected?
(I understand from the RCMP that all non-hit data will be deleted daily, however how long will the remaining data be kept?)
- Will there be any secondary uses of the data retained?
(Have there been any discussions on using the information collected/retained for any other purposes outside of this program?)
- A copy of the Department's ALPR interim policy.
(I believe that Sgt. Fairburn was initially working on a policy. Has it been assigned to someone else?)

Thanks for your assistance.

Steve- OIPC has also requested a PIA; I would like to chat with you on this.

Debra Taylor, Manager
Victoria Police Department
Information and Privacy Section
850 Caledonia Avenue
Victoria BC V8T 5J8
Tel: (250) 995-7289

Taylor, Debra

From: Taylor, Debra
Sent: July 13, 2010 2:04 PM
To: Craig, John; Vermette, Glenn; Ayers, John
Cc: Ing, Steve; Pearce, Jamie; Hamilton, Grant
Subject: ALPR Pilot Program

Hello,

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I reiterated that the Victoria Police Dept. would be following the same principles and processes as outlined in the RCMP program (which their office is familiar with) with respect to the use of the technology, and the management of personal information collected.

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(I believe that Sgt. Fairburn was initially working on a policy. Has it been assigned to someone else?)

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