

Annapolis Police Department



GENERAL ORDER

Number: E.12

**Issue Date: February
2015**

TO: All Personnel

SUBJECT: License Plate Recognition Program

PURPOSE

To establish guidelines for the deployment, maintenance, training, and data storage associated with the usage of License Plate Recognition (LPR) systems by Annapolis Police Department personnel.

POLICY

It is the policy of the Annapolis Police Department to utilize technology in the furtherance of law enforcement efforts to locate and apprehend criminal suspects. It is further the policy of the Department to ensure that the use of technology devices such as LPR should not, intentionally or otherwise, compromise legitimate privacy concerns of law abiding citizens.

Definitions

LPR Scanner - a device that uses cameras and computer technology to compare digital images of license plates to lists of known plates of interest.

Scan File - lists or data obtained by an LPR Scanner of license plates viewed by the device, including potentially images of the plates and vehicle on which it is displayed, and information regarding the location it was viewed by the LPR Scanner.

Extract Download - "hot" lists of license plates associated with vehicles of interest from associated database. **b**

Background

The identification of stolen vehicles, stolen license plates, and wanted and missing persons are the primary focuses of the LPR program. LPR technology uses specialized cameras and computers to quickly capture large numbers of license plate photographs and compares them to a list of plates of interest. The technology is available in mobile systems mounted on police vehicles and fixed camera systems. Mobile LPR systems are designed to allow officers to patrol at normal speeds while the system reads license plates they come in contact with and alerts the officer if there is a match to a "hot list."

I. Installation and Maintenance

- A. The Chief or the Chief's designee will determine the deployment of fixed and mobile LPR systems.
- B. The vendor will be responsible for the installation and maintenance of the LPR system equipment in APD vehicles and at stationary locations. Equipment will be maintained according to manufacturer's recommendations.
- C. The Administrative Services Division (ASD) will be responsible for maintaining the detailed inventory record of all LPR system equipment and conducting an annual physical inventory of all LPR system equipment and reconciling it with their detailed inventory record.
- D. The Commander, ASD, must pre-approve the installation or transfer of any LPR system.
- E. Any damage or malfunctions to LPR systems will be reported immediately according to ASD per established policy and procedures related to the loss of or damage to APD equipment.

II. **ELSAG Operations Center (EOC)**

- A. The ELSAG Operations Center (EOC) manages the MPH-900 mobile LPR units and/or a network of fixed LPR cameras. The EOC uploads and archives both read and alarm data coming from all LPR cameras. The EOC software includes a web site that allows remote access to data. The EOC also manages the distribution of the wanted plates database or lists to LPR units.
- B. The Maryland Coordination and Analysis Center (MCAC) houses a state wide LPR System Operations Center, which is the central clearinghouse for all license plates scanned by LPR systems throughout the state. The Police Department has its own Operations Center for APD's units. Authorized MCAC/ APD personnel have the ability to:
 - 1. Look for a license plate or partial license plate in the history and view the image and location of matches;
 - 2. View maps with the location of plate reads and alarms;
 - 3. View statistical reports on reads and alarms; and
 - 4. View reads and alarms for a specific geographic area and time frame.
- C. The MCAC LPR Program Administrator or designee will ensure "hot lists" are updated at the beginning of each shift. The updated "hot list" will be transmitted to the LPR systems through an encrypted VPN.
- D. All license plate information related to AMBER, Silver, and Blue alerts will be immediately entered into the Operations Center's LPR server by the MCAC LPR Program Administrator or designee. The "hot list" will be updated with the alert information provided by MCAC Personnel. The MCAC LPR Program Administrator or designee will ensure the timely transfer to all LPR systems.
- E. In the event of a critical situation with vehicle registration information, the deployment of an LPR system can maximize the coverage area to search for any vehicle involved. LPR equipped vehicles should be directed to patrol areas which are likely to increase the chance of encountering the vehicle.

III. Fixed LPR Systems

- A. The use of LPR systems and access to its data requires a legitimate law enforcement purpose. No member may use or authorize the use of the equipment or database records for any other reason.
- B. All scanned LPR data will be transmitted to the Annapolis Police Department and then MCAC through an encrypted Virtual Private Network (VPN).
- C. All data scanned by the fixed LPR system is transmitted to the Communications Section. Positive “hits” will activate an alarm. The “hit” along with a digital image of the license plate will be reviewed by monitoring personnel.
- D. The monitor who receives a positive “hit” (alarm) on a scanned license plate will compare the digital image of the license plate to the NCIC information to verify the “hit.”
- E. Verified positive “hits” will be accepted by activating the “accept” alarm key on the video monitoring screen. When an alarm does not result in a verified positive “hit,” personnel will activate the “reject” alarm key.
- F. The monitor will provide the information to the appropriate personnel based on the location of the “hit.”
- G. A positive “hit” alone does not establish probable cause. The “hit” must be confirmed prior to taking any enforcement action.

IV. Mobile LPR Systems

- A. LPR equipment provides access to stolen and wanted files, and is also used in furtherance of criminal investigations. The use of LPR systems and access to its data requires a legitimate law enforcement purpose. No member may use or authorize the use of the equipment or database records for any other reason.
- B. Commanders of personnel who are assigned mobile LPR systems will:
 - 1. Select the appropriate personnel to utilize LPR systems;
 - 2. Ensure they are properly deployed and maintained;
 - 3. Maintain an adequate number of properly trained personnel;
 - 4. Ensure all personnel utilizing or maintaining mobile LPR systems are properly trained prior to using the system; and
 - 5. Ensure that all mobile LPR system equipment is inspected each month and documented. Any deficiencies will be immediately brought to the attention of the ASD Commander.
- C. The mobile data computer in the vehicle will act as a video monitoring center. This is the central clearinghouse for all license plates scanned by the mobile LPR system. Data is stored for thirty days on the mobile data computer.
- D. All data scanned by the LPR system is transmitted to the mobile data computer inside the vehicle and checked against the daily “hot list.” When an alarm is received alerting personnel of a positive “hit,” a digital image of the license plate will be displayed on the mobile data computer screen for review.

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- E. Personnel who receive an alarm of a positive “hit” on a scanned license plate will compare the digital image of the license plate to the NCIC information to verify the “hit.” Verified positive “hits” will be accepted by activating the “accept” alarm key the video monitoring center screen. When an alarm does not result in a verified positive “hit,” personnel will activate the “reject” alarm key. A positive “hit” alone does not establish probable cause. The “hit” must be confirmed prior to taking any enforcement action.
 - F. Personnel will provide the information to the Police Communications Operator (PCO), prior to taking enforcement action, who will immediately attempt to confirm the “hit” according to established policy.
 - G. Commanders will be responsible for ensuring compliance with Department policy.

V. **Emergency Operations**

During the course of normal law enforcement duties, incidents may occur that require immediate assistance. The LPR system can be a valuable tool in these situations, such as alerts, bank robberies, or other violent crimes and can help bring the incident to a safe and successful conclusion. In these cases, deployment of an LPR in the area may assist in the investigation.

VI. **Retention**

- A. Video monitoring center – Information from the video monitoring center is transmitted to the Police Department's server via wireless network. Data is purged automatically from the video monitoring center after thirty days.
- B. Server – Information sent to the Annapolis Police Department's servers will be maintained for a minimum of sixty days but not to exceed six months.

VII. **Training**

- A. The Annapolis Police Department will ensure that appropriate personnel are properly trained on the use of LPR systems and captured plate data. Staff is required to complete the following training prior to accessing any LPR systems:

Training #1: Proper use of Car System

Training #2: Proper use of Operations Center

- B. All trained personnel will sign a User Agreement acknowledging the rules and regulations of accessing LPR data.

VIII. **LPR Coordinator**

- A. The Police Chief will have overall responsibility for LPR data collected or stored by the Police Department. The Special Projects Coordinator will be the LPR Program Manager and is responsible for the day to day operations of the LPR Program.

- B. The LPR Program Manager will oversee daily operations of Annapolis Police Department's LPR Program. The LPR Program Manager will ensure records relating to access to and use of information within an LPR database are available for audit.
- C. The LPR Program Manager will be responsible for the following:
 - 1. Ensuring all approved requests for custom manual inputs are documented and maintained with the LPR Program Manager.
 - 2. Ensuring that all custom manual inputs have a legitimate law enforcement purpose. This option should only be utilized in cases where crimes (e.g. stolen vehicles, radio item broadcasts, etc.) are reported.
 - 3. Ensuring that custom manual inputs are approved by the Commander or his or her designee before their entry into the MCAC Operations Center.
 - 4. Requesting that the MCAC LPR Program Administrator manually enter the registration information into the Operations Center once approved by the Commander or his/her designee. This request for entry into the MCAC Operations Center can be made by the initiating officer or Commander.

IX. LPR Searches

- A. Searches of the LPR database must have a legitimate law enforcement purpose.
- B. Personnel conducting searches will enter the reason for the search in the program and will file a document in a case folder detailing the date, the officer's name, the information searched, the reason why the search was conducted and if the search was negative or information was obtained. Refer to Appendix A as an example.

X. Audit Responsibilities

- A. The Police Chief has overall responsibility for implementation of procedures as it relates to access to and use of Automatic License Plate Reader systems and data. This includes ensuring appropriate personnel are screened and trained in the use of LPR systems.
 - B. The Police Chief will implement audit procedures to include appointment of auditor and identification of certifying official.
 - D. The Police Chief will have responsibility for submission of audit results to certifying official and will have responsibility to present results of certified audit to appropriate legislative entities.
 - E. An Auditor(s) will have responsibility for implementing audit procedures, conducting reviews of appropriate documents and records, interviewing appropriate personnel, and reporting results of audit to Police Chief.
 - F. The Certifying official is responsible for validating results of audit. This includes ensuring audit procedures are followed, appropriate reviews were conducted, audit documents conform with generally accepted audit practices. The official shall not be associated with the operation of the LPR Program; should not be assigned to the Annapolis Police Department.
- and
Certifying
this official

- G. Authorized LPR database users are responsible for full cooperation with auditors.

XI. **Audit Procedures**

- A. The Annapolis Police Department shall submit to an audit annually. The audit shall consist of a predetermined sample size of all relevant requests of data stored in any LPR database. The sampling shall be a random selection of at least 10 percent of relevant requests from that audit period, but no fewer than 50. In the event the total of requests is less than 50, all requests will be audited.
- B. The following two steps shall be used to assess compliance:
1. Administrative Interview: An interview is conducted with the LPR Program Manager to review agency procedures relating to the operation and use of LPR systems; to include completion of sample questionnaire in Appendix B.
 2. Data Quality Review: In conjunction with the interview, a data quality review is conducted with the LPR Program Manager. This entails comparison of requests to query the LPR database against agency case files and consultation with agency representatives. The accuracy, completeness, and validity are verified during the data quality review.
- C. Audit results will be captured utilizing various checklists/worksheets. Auditors will compile a report of audit results. The Auditors report, with appropriate additional documentation (worksheets, etc.), shall be provided to certifying official for validation.
- D. The following information shall be maintained for the audit:
1. Date and time of the request; and
 2. Purpose of the request; and
 3. Incident or report number (physical record number) related to the query; and
 4. The identity of the agency requesting the query (including if the requester is from a local, state, federal or out-of-state agency); and
 5. The requester's name and contact information; and
 6. The license plate number or other data elements used to query the LPR system
- E. Records containing inaccurate or incomplete data shall be documented by Auditor and provided to the Police Chief for appropriate action. A record that requires corrective action is categorized as inaccurate, unable to location, or incomplete. Below is a description of each discrepancy:
- Inaccurate:* Key fields in the LPR query record did not match the report, warrant, investigation or supporting document.

Unable to locate: The report, warrant, investigation and/or supporting documentation that substantiates the LPR query could not be located.

Incomplete: the report, warrant, investigation, or supporting documentation contains additional data that should be included in the LPR request record.

- F. Beginning on or before March 1 of each year [beginning in 2016], the Annapolis Police Department shall report to the Senate Judicial Proceeding Committee, the House Judiciary Committee, and the Legislative Policy Committee, and the Legislative Policy Committee, in accordance with 2-1246 of the State Government Article, on the lists of audits that were completed.

Michael A. Pristoop
Chief of Police

References
None

This General Order replaces E.12 entitled License Plate Recognition Program dated November 2012.

Appendix A

**Annapolis Police Department
LPR Database Search**

On _____, Officer _____ conducted a search of the

LPR database in reference to case # _____ . The search was based on

_____ (information from a witness, video, investigation

etc.) Information was obtained / was not obtained. (circle one)

Appendix B
SAMPLE AUDIT QUESTIONS (Step 1)

Goal	Question	Answer	Comments
1	Have procedures been adopted relating to the operation and use of the LPR system? [Cite policy number]	YES NO	
2	Are staff with access to the Automatic License Plate Reader database adequately screened and trained?	YES NO	
3	Does the agency maintain training records for each user?	YES NO	
4	Is the training curricula maintained?	YES NO	
5	Are training records annually reviewed for relevancy and effectiveness?	YES NO	
6	Does the agency accept law enforcement requests for historical plate data, collected by an LPR system?	YES NO	
7	If historical data is accessed, does the agency have an audit trail?	YES NO	
8	Is the audit trail maintained for 2 years?	YES NO	
9	Have audit procedures been adopted to ensure that information obtain through the use of an LPR system is used for legitimate law enforcement purposes?	YES NO	
AGENCY:		SCOPE OF AUDIT:	
COMPLETED BY:		DATE COMPLETED:	
REVIEWED BY:		DATE REVIEWED:	

SAMPLE AUDIT QUESTIONS (Step 2)

	Question # 1	Question #2	Question # 3	Question # 4	Question #5	Results
Record #	Report/Incident Number	Is the date and time of request documented?	Is the purpose of the request documented?	Does the request include the identity of the agency requesting the query?	Has the request been validated through the requesters agency?	Findings shall be listed as: Accurate, Inaccurate, Unable to locate or Incompletd
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