

University of Nebraska-Lincoln

Parking and Transit Services

Automatic License Plate Reader Policy

July 1, 2022

PURPOSE & SCOPE

The University of Nebraska-Lincoln utilizes Automatic License Plate Reader (LPR) technology to support management of campus parking facilities. The LPR system allows a vehicle license plate to also be used as or linked to the university parking permit or parking violations in accordance with the University of Nebraska-Lincoln parking rules and regulations.

By using the University of Nebraska-Lincoln's parking permit, hourly parking, event parking services, the customers acknowledge and accept the practices and policies outlined in this document.

This Policy:

- Specifies the allowable uses of and data collected for the LPR Systems and LPR Information at the University of Nebraska-Lincoln
- Designates the Vice Chancellor for Business and Finance as the Campus LPR Authority; and
- Provides authorization for UNL Parking and Transit Services to operate LPR Systems and use LPR Information.
- Defines the privacy on how the data may be shared.

This policy serves as the privacy policy required by Nebraska State Statute 60-3206 Governmental entity; duties; report; contents to ensure that the collection, use, maintenance, sharing, and dissemination of LPR Information is consistent with federal, State, and local law.

II. DEFINITIONS (Nebraska State Statute 60-3202)

For the purposes of this Policy:

Automatic License Plate Reader System (LPR) Information means information or data collected through the use of an LPR system.

Automatic license plate reader system means one or more mobile or fixed automated high-speed cameras used in combination with computer algorithms to convert images of license plates into computer-readable data;

Captured plate data means global positioning system coordinates, date and time information, photographs, license plate numbers, and any other data captured by or derived from any automatic license plate reader system;

Governmental entity means a department or agency of this state, the federal government, another state, or a political subdivision or an individual acting for or as an agent of any of such entities;

III. POLICY STATEMENT

The Vice Chancellor for Business and Finance is designated as the Campus LPR Authority. The Vice Chancellor for Business and Finance may delegate the role of Campus LPR Authority.

A. Authorized Uses

Operation of LPR Systems and/or access to or use of LPR Information must only be for legitimate, official business purposes:

The LPR system may be used by a governmental entity for the purpose of parking management, occupancy counting, violation location, and rule enforcement and data analyzing parking utilization.

Uses include identifying: (Nebraska State Statute 60-3203)

- Outstanding parking violations;
- A vehicle not registered with UNL;
- Vehicles for use of regulating the parking facility;
- Vehicles for the purpose of controlling access to a secured area;
- abandoned vehicles left in parking facilities operated by the University of Nebraska-Lincoln
- Available parking spaces;

Other uses include

- Respond to inquiries from law enforcement, legitimate third-party subpoenas or from other legitimate third parties as applicable under Nebraska State Statute;
- Generate various operational metrics and statistical reports internal to the Parking and Transit Services Department.
- LPR Data related to parking violations or policy infractions may be shared with campus administration and/ or supervisors to support customer service and quality control.

Any other use must have prior written approval by the Campus LPR Authority.

B. Authorized Users

UNL Parking and Transit Services

The Campus LPR Authority authorizes the following roles within UNL Parking and Transit Services to operate LPR Systems and use LPR Information: Parking Enforcement Officer, Parking and Transit Services Director/Assistant Director, and positions required for the continued operation of normal parking enforcement, event, and occupancy counting operations and other uses listed in Section III A; and University of Nebraska-Lincoln Police Department (UNLPD) sworn personnel and emergency dispatchers.

IV. LPR DATA COLLECTION

The LPR system captures two images of observed vehicles: a context image of the vehicle and its immediate surroundings, and an image of the license plate. Images are usually taken of the rear of a vehicle, but an image of the front of a vehicle may be taken when the vehicle is backed into a parking space, parked in a driving aisle, or parked in any other way which provides better visibility of the vehicle's front. Images taken are not of a resolution that allows for identification of vehicle occupants, if any.

Along with the images, the LPR system also records the global positioning system coordinates and date/time information of the observation. Further software processing of the license plate image generates an alphanumeric version of the license plate number which is also stored with the record. The LPR system itself does not contain individual parking patron's account information but may be linked to such information by Parking and Transit Services.

A. Retention (Nebraska State Statute 60-3204)

Data collected by the LPR system that does not result in a parking enforcement action and is not part of an ongoing law enforcement investigation will be purged after 90 days, but accessible for 180 days. Data that results in parking enforcement action will be retained with the citation record for up to 7 years. Data associated with an ongoing law enforcement investigation shall be retained with the investigative record according to established University of Nebraska record retention policies.

Institutional Information Disposal Standard. NE State Statute 60-3204

B. Sharing

LPR Information may be shared within UNL, as well as with law enforcement agencies and other public agencies, in accordance with Nebraska State Statutes and at the discretion of the Campus LPR Authority, in support of law enforcement investigations, parking planning or research, or other legal purpose. Any sharing of LPR Information requires (a) written authorization from the Campus LPR Authority and (b) a written agreement between requestor and LPR Information holder and consult with General Counsel.

E. Prohibition on Sale

LPR Information will not be sold under any circumstances.

V. PRIVACY (Nebraska State Statute 60-3209)

By using the University of Nebraska-Lincoln's parking permit, hourly parking, event parking services, the customers acknowledge and accept the practices and policies and use of the information for the purpose of parking management, occupancy counting, violation location, and rule enforcement and data analyzing parking utilization and other uses identified in section III A and IV B.

Captured plate data held by a governmental entity is not considered a public record for purposes of sections 84-712 to 84-712.09 and shall only be disclosed to the person to whom the vehicle is registered or with the prior written consent of the person to whom the vehicle is registered or pursuant to a disclosure order under subsection (2) of section 60-3205 or as the result of a match pursuant to subsection (2) of section 60-3203.