ICDPPC Global Privacy and Data Protection Awards

2018

Entry Form

Deadline 29 June 2018

To submit an entry to the ICDPPC Global Privacy and Data Protection Awards please complete and email this form to ExCoSecretariat@icdppc.org no later than 29 June 2018.

Note: ICDPPC member authorities can submit as many entries as they wish but a separate form should be used for each different entry. Please complete the entry in English.

1. **Contact details for this entry**:
   a. Name and email address of person completing this form:
   b. Name of Data Protection or Privacy Authority: **Office of the Information and Privacy Commissioner of Ontario, Canada (OIPC)**

2. **Eligibility**: By submitting this entry I confirm that:
   a. The Authority is a member of the International Conference of Data Protection and Privacy Commissioners.
   b. The initiative described in this entry was undertaken since the last edition. Please note that the OIPC initially released guidance on ALPR in 2016 but the guidance was subsequently updated as a result of additional consultations with Ontario's provincial police service (the OPP) and the revised version was released in July of 2017. Our work on this project is now complete.
   c. I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the ICDPPC Secretariat.

3. Please indicate which **category or categories** you wish to enter (delete those that do not apply; you can enter multiple categories):
   a. Education and public awareness
   b. Accountability

4. **Description of the initiative**
   a. Please provide a brief summary of the initiative (no more than 75 words):

   > The OIPC's document, _Guidance on the Use of Automated Licence Plate Recognition Systems by Police Services_, outlines the key obligations police services have under Ontario's public sector privacy legislation in their use of ALPR systems for public safety purposes. The guidance includes best practices for using ALPR systems in a privacy-protective manner and discusses issues, including:
   >
   > - overview of ALPR technology
   > - privacy implications of ALPR systems
   > - benefits of Privacy Impact Assessments
   > - implementation guidelines

   b. Please provide a full description of the initiative (no more than 350 words):

   > In recent years, the OIPC has observed a growing interest in the use of automated licence plate recognition (ALPR) technology by police services in Ontario. We also recognized that some implementation models of ALPR technology pose significant risks to privacy.

To address this concern, we developed detailed guidance to support the implementation of ALPR systems in a privacy-protective manner, in consultation with the OPP. *Guidance on the Use of Automated Licence Plate Recognition Systems by Police Services* explains how an ALPR system is typically used by a police service and sets out detailed, practical and implementable guidance for police services seeking to install an ALPR system.

ALPR technologies quickly capture and match large volumes of licence plate numbers to lists of plates stored in a database. Police services in Ontario use ALPR systems to match licence plates with lists of plates, such as stolen and expired plates and plates registered to suspended drivers. These systems can also be set up to capture other information, such as the location of vehicles at specific times and dates. As a result, ALPR systems have the potential to track individuals' locations over time, facilitating surveillance and profiling of law-abiding individuals as they go about their everyday lives. The OIPC guidance highlights these privacy risks, and demonstrates the dangers of implementing an ALPR system without adequate policies, procedures and technical controls.

The document provides detailed guidance on best practices for implementing the technology, such as conducting a Privacy Impact Assessment and consulting the OIPC prior to implementing the program. It also summarizes and clarifies the key obligations of police services under Ontario's privacy legislation when using an ALPR system. These obligations include requirements related to notice, collection, retention, use, disclosure, accuracy, security and access to information requests. For example, police should only retain non-violator data briefly, and delete this data at the earliest opportunity. Other tools to mitigate privacy risks and ensure accountability are also recommended, such as conducting system reviews and audits, and staff training.

c. Please explain why you think the initiative deserves to be recognised by an award (no more than 200 words)

Guidance on the Use of Automated Licence Plate Recognition Systems by Police Services is the first guide of its kind in Canada and serves as a baseline for the policies and procedures for establishing ALPR systems.

The OIPC consulted with the OPP to ensure the guidance's applicability, utility, and relevance to police services across the province. Our research and consultation work began in 2015 and was completed in 2017.

Today, more than 20 police services in Ontario follow the OIPC guidance. Many Ontario police services are transparent about their use of ALPR and compliance with our guidance. For example, the London Police Service's ALPR website shares news, videos, the OIPC guide, and other general information about the system, emphasizing the service's commitment to compliance.

Lastly, many of the principles and best practices discussed in the guidance have broad application to other surveillance technologies, such as police body worn cameras and school bus stop-arm cameras.

d. Include a photograph or image if you wish (note this will help illustrate the description of the entry on the ICDPPC website; the image can be pasted into the entry or send as an attachment or a link may be provided):
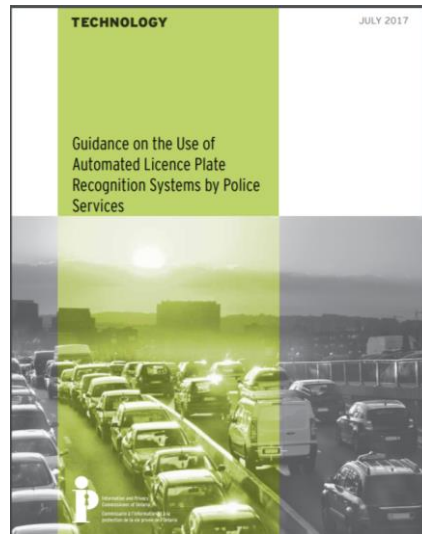
e. Please provide the most relevant link on the authority's website to the initiative (if applicable) (The website content does not need to be in English): Guidance on the Use of Automated Licence Plate Recognition Systems by Police Services

f. Please provide any other relevant links that you wish that help explain the initiative or its impact or success (e.g. links to news reports or articles):
    - The London Police Service's ALPR website
    - Independent Free Press article
    - The Square – Windsor's Independent News Source