



Berkeley Police Department Memorandum



To: Chief Louis
From: Arlo Malmberg, Strategic Planning and Accountability Manager
Date: September 13, 2024
RE: Genetec Automated License Plate Reader Audit

OVERVIEW

The Berkeley Police Department's Strategic Planning and Accountability Manager conducted an audit of the Genetec ALPR system to assess compliance with Policy 1302, Surveillance Use Policy – Automated License Plate Reader (ALPR). The audit scope included access records for the Genetec ALPR system between January 1, 2024 and June 30, 2024. The audit methodology involved analyzing these access records for unauthorized access, data breaches, and prohibited uses.

The audit found full compliance with Policy 1302, with no instances of unauthorized access, data breaches, data errors, or prohibited uses detected. All system access was made by authorized personnel as stipulated in the policy.

BACKGROUND

Policy 1302 outlines the requirements for use and access to the Genetec ALPR systems by Parking Enforcement Officers. The policy mandates biannual audits of the ALPR system to ensure compliance and detect any unauthorized access or data breaches.

PRIOR AUDITS

The last audit was conducted in January 2024. No findings were recorded. The next audit will be conducted in January 2025.

SCOPE AND METHODOLOGY

The scope of this audit included all access records for the Genetec ALPR system between January 1, 2024 and June 30, 2024.

The audit methodology involved:

1. Retrieving Genetec ALPR system access records for the specified timeframe from the Parking Enforcement Manager.
2. Analyzing the records for any instances of unauthorized access, data breaches, or prohibited uses.
3. Verifying that all system access was made by authorized personnel as stipulated in Policy 1302.

SUMMARY OF FINDINGS



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| Objective # | Audit Objectives | # Meeting Standards | % Meeting Standards |
|-------------|----------------------------------|--|---------------------|
| 1 | Authorized access to ALPR system | 191 Admin actions, 2580 PEO logins/logoffs / 191 Admin actions, 2580 PEO logins/logoffs | 100% |
| 2 | No data breaches | 191 Admin actions, 2580 PEO logins/logoffs / 191 Admin actions, 2580 PEO logins/logoffs | 100% |
| 3 | No prohibited uses | 191 Admin actions, 2580 PEO logins/logoffs / 191 Admin actions, 2580 PEO logins/logoffs | 100% |

DETAILED FINDINGS

Objective 1: Authorized access to ALPR system

Criteria:

1302.5 DATA ACCESS (a): " Only properly trained Parking Enforcement Officers, Sworn Officers as selected by the Investigation's Division Captain, and Information Technology personnel are allowed access to the Genetec ALPR system or to collect ALPR information."

Inspection Procedure:

- Review all access records for the Genetec ALPR system during the audit period.
- Verify that all access was made by authorized personnel.

Findings:

- All access to the Genetec ALPR system was made by authorized personnel
- System maintenance access by Genetec personnel and City of Berkeley IT was also noted and deemed appropriate.

Recommendations:

- None. The 100% compliance rate meets department standards.

Objective 2: No data breaches

Criteria:

1302.11 AUDITING AND OVERSIGHT (1): "Any unauthorized access or data breach shall be reported immediately to the City Manager..."

Inspection Procedure:

- Analyze access records for any signs of data breaches.



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- Confirm with the Parking Enforcement Manager that no data breaches were reported during the audit period.

Findings:

- No data breaches were detected or reported during the audit period.

Recommendations:

- None. The 100% compliance rate meets department standards.

Objective 3: No prohibited uses

Criteria:

1302.11 AUDITING AND OVERSIGHT (1): "...BPD will enforce against prohibited uses of the Genetec ALPR system, associated ALPR Read and Hit metadata, and lists and databases pursuant to Policy P-26, or other applicable law or policy."

Inspection Procedure:

- Review access records for any indication of prohibited uses of the ALPR system or data.

Findings:

- No prohibited uses of the ALPR system or associated data were detected during the audit period.
- The majority of system accesses were by Genetec personnel for IT support and user management. The remaining accesses were primarily by the Parking Enforcement Manager and Parking Enforcement Officer Supervisors for reviewing system configurations and usage.

Recommendations:

- None. The 100% compliance rate meets department standards.

MANAGEMENT'S RESPONSE

The Parking Enforcement Manager, Lyesha Garrett, has reviewed the report and concurs with the findings presented herein.