

c/o PO BOX 481  
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21/08/2025

**FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 2387/2025**

Thank you for your request for information regarding ANPR County Lines Pilots; which has now been considered.

**Applicant Question:**

The NPCC Science and Technology Strategy states: "Home Office Digital, Data and Technology (DDAT) and forces are collaborating on pilots that utilise Automatic Number Plate Recognition data to identify and proactively target high harm County Lines offenders. Applying automated data analytics tools and policing techniques has already proven highly successful in identifying suspicious travel."

For each of these pilots, or for any overarching initiative governing these pilots, please provide any:

1. Project Initiation Documents Project
2. Funding bids
3. Memorandums of understanding
4. Data Sharing Agreements
5. Data Protection Impact Assessments
6. Equality Impact Assessments
7. Evaluation documents

**NPCC Response:**

The NPCC does hold recorded information captured by parts of your request.

For completeness, the NPCC does not hold recorded information captured by parts three, six and seven of your request.

Part One

The NPCC does hold recorded information captured by your request:

- Part 1 Outline ANPR

The above engages S31 Law Enforcement exemption. For further information relating to the legislation, please see Annex A.

#### Pat Two

The NPCC does hold recorded information captured by your request:

- Part 2A ANPR FUP MTA Bid
- Part 2B CDAP Funding Request form

The above engages S31 Law Enforcement exemption. For further information relating to the legislation, please see Annex A.

#### Part Four

The NPCC does hold recorded information captured by your request.

- Part Four Data Processing Contract

The above engages S31 Law Enforcement and S40 Personal Information exemption(s). For further information relating to the legislation, please see Annex A.

#### Part Five

The NPCC does hold recorded information captured by your request:

- Part Five DPIA Find and Profile County Lines

The above engages S31 Law Enforcement and S40 Personal Information exemption(s). For further information relating to the legislation, please see Annex A.

Yours sincerely

Sherry Traquair  
Freedom of Information Officer & Decision Maker

[www.npcc.police.uk](http://www.npcc.police.uk)

## **COMPLAINT RIGHTS**

Internal Review

If you are dissatisfied with the response you have been provided with in compliance with the Freedom of Information legislation, you can lodge a complaint with NPCC to have the decision reviewed within 40 working days of the date of this response.

The handling of your request will be looked at by someone independent of the original decision and a fresh response provided.

It would be helpful, if requesting a review, for you to articulate in detail the reasons you are not satisfied with this reply.

Any request for an internal review will be acknowledged and responded to, **based on the specific wording of your initial request only**.

**We ask that any rationale to request an internal review, does not include any requests for new information and ask that these be submitted by separate email. We will acknowledge as a new request and may aggregate to your initial request in compliance with the legislation.**

If you would like to request a review, please write or send an email to NPCC Freedom of Information, c/o PO Box 481, Fareham, Hampshire, PO14 9FS.

## Annex A

Section 17 of the Freedom of Information Act 2000 requires the NPCC, when refusing to provide information by way of exemption in question and (c) states why the exemption applies. In accordance with the Freedom of Information Act 2000 this letter acts as a refusal notice to those aspects of your request.

### The legislation: Section 31 Law Enforcement

- (1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice -
- (a) the prevention or detection of crime
  - (b) the apprehension or prosecution of offenders

Disclosure of this information would enable those with criminal intent to target specific areas of the UK to conduct their criminal or terrorist activities. This would also enable criminals to take measures to counteract the tactical capabilities of police forces.

Disclosure of this information would have the likelihood of identifying specific vulnerabilities, which would ultimately compromise police tactics, operations and future prosecutions. Any information identifying the focus of policing activity could be used to the advantage of terrorists or criminal organisations. Information that undermines the operational integrity of these activities will adversely affect public safety and have a negative impact on law enforcement. Public safety would be put at risk if criminals were able to counteract police tactics. The NPCC is committed to demonstrating proportionality and accountability.

Any information that could impact or undermine ongoing investigations or any future investigations would enable targeted individuals / groups to become tactically aware of the police capabilities. This would help subjects and avoid detection, and inhibit the prevention and detection of crime.

The NPCC will not disclose information which may hinder the effective management of law enforcement or place staff or officers at risk. Whilst there is a public interest in the transparency of policing operations and in this case providing assurance that the police service is appropriately and effectively managing this area of policing, there is a very strong public interest in safeguarding the tactical abilities.

The prevention and detection of crime is the foundation upon which policing is built and the police service have a clear responsibility to prevent crime and arrest those responsible for committing crime or those that plan to commit crime. Disclosure of information captured by this request could directly influence the stages of that process, and jeopardise current investigations or prejudice law enforcement.

### The legislation: Section 40 Personal Information

- (1) Any information to which a request for information relates is exempt information if it constitutes personal data of which the applicant is the data subject.

- (2) Any information to which a request for information relates is also exempt information if**
- (a) it constitutes personal data which does not fall within subsection (1), and**
  - (b) the first, second or third condition below is satisfied.**

(3A) The first condition is that the disclosure of the information to a member of the public otherwise than under this Act—

- (a) would contravene any of the data protection principles, or
- (b) would do so if the exemptions in section 24(1) of the Data Protection Act 2018 (manual unstructured data held by public authorities) were disregarded.

(3B) The second condition is that the disclosure of the information to a member of the public otherwise than under this Act would contravene Article 21 of the GDPR (general processing: right to object to processing).

Any information to which a request for information relates is also exempt information if it constitutes personal data which do not fall within subsection (1), and either the first or the second condition is satisfied.

S40(2) applies to third party personal data. Any release would breach the data protection principles contained within the Data Protection Act 2018. S40(2) has been engaged by virtue of S40(3)(a)(i). Any disclosure of withheld information would breach the first data protection principle of fair and lawful processing.

This is an absolute exemption and there is no requirement to apply the public interest test.

#### **Legislation – Section 16**

- (1) It shall be the duty of a public authority to provide advice and assistance, so far as it would be reasonable to expect the authority to do so, to persons who propose to make, or have made, requests for information to it.