



Home Office



Automatic Number Plate Recognition (ANPR)

ANPR Strategy 2016 -2020
Infrastructure Development

Version 1
July 2017

Document Control

Change Control

Version	Date	Change	Author
0.1	1 June 2016	Initial draft version	Bill Mandeville
0.2	22 June 2016	Minor revisions	Bill Mandeville
0.3	18 August 2016	Updated following consultation with ICO and RUG Chair.	Bill Mandeville
0.4	13 Dec 2016	Clarification of Service Management team role in infrastructure development.	Bill Mandeville
0.5	18 July 2017	Minor revisions re data controller (3.5) and Service Management responsibility (3.6)	Bill Mandeville
1.0	25 July 2017	Document as approved by Strategy Board on 25.7.17	Bill Mandeville

1 Introduction

- 1.1 Strategic Objectives within the ANPR Strategy 2016 -2020 (ANPR Strategy) that relate to Infrastructure Development include an intention to establish support to consistent development of infrastructure at a national level.
- 1.2 Important elements of the ANPR Strategy include provisions for a review of, and support to, the development of national infrastructure to:
- ensure that current deployments are consistent between LEA,
 - identify any potential duplication of capability arising as a consequence of integrating local systems into a single national system, with proposals for mitigation,
 - identify any gaps in infrastructure provision that may be mitigated by deployment of additional ANPR capability
- 1.3 The strategy also includes a requirement for a review of the criteria for infrastructure development to be conducted and for consideration to be given to the establishing of provisions for national approval of fixed site NRD deployments that will be in place for 1 year or more.
- 1.4 Consideration has been given to establishing a requirement for approval of fixed site NRD deployments that will be in place for over 1 year, with a conclusion that national approval is inappropriate but the national support to achieve the aims at 1.2 above is required.
- 1.5 The criteria for infrastructure development will be described within this document together with the provisions to support the development and review of long term fixed NRD deployments.

2 Criteria for Infrastructure Development

- 2.1 National ANPR Standards for Policing (NASP) (Part 2 Section 7) include standards to support infrastructure development. The standards provide that:

ANPR NRD may only be deployed, or an LEA receive data, from ANPR systems operated by other organisations for submission to the NAS, at locations identified following a strategic assessment that identifies a need for ANPR at that location for national security or counter terrorism purposes or in order to detect, deter, and disrupt offending. Where a need is identified consideration of whether the deployment, or the receipt of ANPR data, is appropriate and proportionate in balancing protection of the public with the rights and legitimate expectations of individual privacy is also required.

Strategic assessment should take account of the following factors:

- National Security and Counter Terrorism,
- Serious, Organised and Major Crime

- Local Crime,
- Community Confidence and Reassurance, Crime Prevention and Reduction.

- 2.2 NASP also requires that a Privacy Impact Assessment (PIA) is conducted for all new planned infrastructure development with the extent of consultation, forming part of that assessment, being determined in the context of each proposal. Consultation should include all persons and organisations with a reasonable interest in the proposed development unless that would be contrary to the purpose of the development, or the deployment is covert and authorised within provisions of the Regulation of Investigatory Powers Act 2000 (RIPA).
- 2.3 NASP includes a requirement for the need for a Number Plate Reading (NRD) device (NRD) to be deployed at a location to be monitored and the device removed should the justification for deployment at a location cease. In addition all deployments must be reviewed at least annually taking account of the criteria at 2.1 above.
- 2.4 The criteria for infrastructure development detailed within NASP were developed in consultation with the Information Commissioners' Office. They have been reviewed and remain appropriate to support consistency of deployment and management of infrastructure.
- 2.5 Whilst the criteria remain appropriate it is recognised that transparency in the application of those criteria is required to maintain public confidence and support to the use of ANPR by Law Enforcement Agencies (LEA). The factors relevant to identifying the necessity for ANPR are clearly identified (2.1 above) however guidance on the assessment of privacy considerations are not provided in the context of NRD deployments including how these should impact on assessment of the proportionality of a deployment.
- 2.6 Article 8(1) of the European Convention on Human Rights (ECHR) guarantees the right to respect for private and family life, home and correspondence. Under Article 8(2), interference with the right by a public authority which includes LEA must be justified as being in accordance with the law and necessary in furtherance of one or more of certain legitimate aims, which will include those listed at 2.1 above.
- 2.7 The use of ANPR does not generally result in the obtaining of private information. Registration plate detail is not in itself private information. A vehicle registration number plate (VRM) is a deliberately overtly displayed marker, which can be seen, and is intended to be seen. Every person who drives a car voluntarily accepts that they are likely to be capable of being linked to a particular vehicle by reference to the VRM in the context of other data, and that ANPR technology on the roads will allow LEA to determine presence of a vehicle at a location. In general road users have no reasonable expectation of privacy in relation to ANPR being able to determine their presence on the road.
- 2.8 Whilst in general road users have no reasonable expectation of privacy in relation of their use of a vehicle on a road, private life considerations are likely to arise if

several records are to be analysed together in order to establish, for example, a pattern of behaviour, or if one or more pieces of information are obtained for the purpose of making a permanent record about a person or for subsequent data processing to generate further information. The retention of read ANPR to enable later research does therefore have the potential to impact on privacy.

- 2.9 The attached framework is provided to assist LEA to assess the proportionality of deployment of NRD at a location taking account of privacy. (Appendix A) It is proposed that detailed guidance on the development and review of ANPR infrastructure is revised to include this matrix.

3 National Infrastructure

- 3.1 The ANPR Strategy includes provisions for review of and support to the development of national infrastructure and for a review to be conducted to:
- ensure that current deployments are consistent between LEA,
 - identify any potential duplication of capability arising as a consequence of integrating local systems into a single national system, with proposals for mitigation,
 - Identify any gaps in infrastructure provision that may be mitigated by deployment of additional ANPR capability.
- 3.2 The National ANPR Service (NAS) enables LEA and significantly police services to access data from NRD outside the boundaries of their own force area for all users in accordance with their access provisions. Access to national data was previously limited to staff who were authorised to access the National ANPR Data Centre (NADC). The NADC did not support live time matching of vehicle of interest (VOI) lists for operational response purposes. The access to NRD from outside of a force geographical boundary presents opportunity to review deployments of NRD.
- 3.3 Part 2 NASP (section 7.1) requires that the locations for NRD must be reviewed annually to ensure that the deployment, or receipt of data from that location remains appropriate and proportionate. The review process will be utilised to support a review of national infrastructure.
- 3.4 The ANPR Strategy also requires consideration to be given to national approval of deployment of NRD at a fixed site for a period of greater than 1 year.
- 3.5 The data controller for a NRD is the chief officer for the LEA that owns or controls the NRD that initially captures the 'read' data, or receives data where it is using shared collection equipment, and submits the data to the National ANPR Service; it is therefore appropriate that guidance is provided to support decisions by that data controller but not for deployment to be subject to national approval.
- 3.6 Responsibility for managing the extent of national infrastructure and in provision of guidance to support decisions by data controllers regarding the deployment of

fixed site infrastructure for periods of greater than 1 year rests with Home Office ANPR Service Management.

- 3.7 In order for the Service Management team to meet that responsibility LEA will submit a form (Appendix B) for each current and proposed fixed site NRD that is, or is intended to be, deployed for greater than 1 year.
- 3.8 This will apply for all new NRD deployments that are intended to be in place for over 1 year and for others that have been deployed since 1st April 2016, that are in place for 1 year or more. The Service Management team will advise the data controller of any information that is relevant to their decision for the deployment or continued deployment of a NRD. This will include relevant information from any national oversight arrangements and regulators.
- 3.9 The Service Management team will maintain an overview of fixed site NRD deployments and advise the NPCC Policing lead for ANPR of any apparent duplication in deployments, or of any deployment for which the deployment may be inconsistent with the decisions of data controllers in other LEA.
- 3.10 The Service Management team will identify any potential gaps in the strategic ANPR network and liaise with relevant LEA to confirm whether a pressing need for ANPR consistent with the criteria in section 2 above, arises in those that has not been previously met.
- 3.11 The Service Management team will support LEA in the identification of opportunities for collaboration between LEAs and with other public and private sector operators of ANPR and will assist in exploring and opportunities that are identified, as appropriate. This approach will reduce the overall number of NRDs that are deployed in some locations and reduce the costs of establishing ANPR infrastructure at those locations where it is necessary and proportionate to do so.

Appendix A

Privacy Assessment Matrix	National Security/ Counter Terrorism	Serious, Organised and Major Crime	Local Crime	Crime Prevention and Reduction	Community Confidence and Reassurance
Motorways					
Highways England, Transport Scotland or Welsh Government managed Roads					
Local Authority managed Major Rural Roads					
Local Authority managed Major Urban Roads					
Local Authority managed Minor Rural Roads					
Local Authority managed Minor Urban Roads					
Crowded places eg Regional shopping centres					
Private car parks					

Code	
Deployment very likely to be justified	
Deployment likely to be justified in most cases	
Deployment likely to be justified in exceptional cases only	

Name of Law Enforcement Agency:

Location of current/ Proposed NRD:

Reason for Deployment – Overview of Pressing Need

National Security/ Counter Terrorism	Serious, Organised and Major Crime	Local Crime	Crime Prevention and Reduction	Community Confidence and Reassurance

(Indicate all that apply)

Summary of Strategic Assessment justifying deployment.

Assessment of Privacy Impact: (Indicate extent and outcome of consultation: Description of the location including road type)

Form Completed by:

Date:

Send to anpr@homeoffice.gsi.gov.uk with subject "Infrastructure Development" when complete

Home Office Service Management Assessment:

Deployment is appropriate within National Infrastructure - No further consideration required. Yes/No

(If 'No' data controller is to be advised of information to assist a review of new or continued deployment.)

Date of Assessment:

Date LEA advised: