West Midlands Police
Automatic Number Plate Recognition (ANPR)
Infrastructure Development

Privacy Impact Assessment

This document is a Home Office product which has been provided to support the police service and other law enforcement agencies (LEA) to comply with their data protection and human rights obligations and meet individuals' expectations of privacy when developing new ANPR infrastructure.

It has been developed in consultation with the ICO, to provide a consistent approach to the conduct of privacy impact assessments and support compliance with the Information Commissioner's Office (ICO) Conducting privacy impact assessments code of practice (February 2014).

Privacy Impact Assessment completed by: Supt Darren Miles, Colin Holder

Description of proposed ANPR development:

The proposed ANPR sites are an extension of existing West Midlands Police (WMP) cameras across our own force area and cameras on the motorway infrastructure in the region.

The WMP ANPR Strategy Board commissioned the Force Intelligence Department to produce an analytical product that analysed the WMP Crimes database for a 5 year period between November 2008 and October 2013 – see report in Section 1 of this file.

This analysis concentrated on serious acquisitive crime and the following crime types were analysed due to the likelihood of a vehicle being used during the offence:

- Car key burglary and attempts;
- Theft of motor vehicle and attempts;
- Theft from motor vehicle, fuel and catalytic converters;
- Business robbery and attempts;
- Cash and Valuables in Transit offences;
- Business burglary (other building) and attempts.

ANPR is a tried and tested operational tool, not only for WMP but also utilised by all police forces in the United Kingdom. [redacted]

Within 9 months of the proposed ANPR sites going live, a review will be carried out to ascertain the success of the locations and to either recommend that the sites are supported or alternatively, to move the cameras to new locations. This report will be commissioned and reviewed by the WMP ANPR Strategy Board.
A new community consultation process and privacy impact assessment will be undertaken at this time.

Part 1 Screening Questions

1	**Will the project involve the collection of new information about individuals?**
	Yes - Vehicle Registration Marks (VRM) will be obtained from locations not previously monitored by ANPR and therefore new information will be obtained from those locations.
2	**Will the project compel individuals to provide information about themselves?**
	Yes - The collection of VRM is automatic at the locations and therefore when an individual drives a vehicle at the new locations they could be considered as compelled to provide information as they have no choice.
3	**Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?**
	Yes - Whilst information from new locations will be disclosed it will only be disclosed to those organisations that currently have access to ANPR data in accordance with access permissions appropriate to their role.
4	**Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?**
	The new ANPR infrastructure will provide ANPR data for the same purposes as for the data already obtained from ANPR systems. The developments will not alter the way in which it is used.
5	**Does the project involve you using new technology that might be perceived as being privacy intrusive? For example biometrics or facial recognition.**
	ANPR is not new technology however the development of new locations increases the ability for monitoring of vehicle movements and therefore although not new technology the provision of increased capability may be perceived as privacy intrusive. The project does not include any new technology such as biometrics or facial recognition.
6	**Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?**
	Yes - The purpose of the proposed development of infrastructure is in order to detect, deter, and disrupt criminality and therefore impact significantly on those involved in such activity.
7	**Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.**
	ANPR data is personal data since it can be combined with other information by an LEA to provide data relating to an individual. The collection of ANPR data does raise privacy concerns.
8	**Will the project require you to contact individuals in ways that they may find intrusive?**
	There is no requirement to contact individuals as a result of the collection of ANPR data, however it may result in later contact in the course of an investigation.

Part 2 Record of Privacy Impact Assessment (PIA) Process

Our strategic assessment concentrated on serious acquisitive crime and for the five year period analysed, there were a total of 69,654 offences. [redacted]

This information highlighted locations that would benefit from the installation of ANPR cameras that would assist to reduce the threat of serious, organised and major crime in the West Midlands.

[redacted]

The business case for the new proposed ANPR sites is the strategic assessment – see report in Section 1 of this file. This analytical product forms the basis for the site selection process but in addition we have taken into account the existing ANPR assets not only operated by WMP but also neighbouring forces. This strategy maximises the potential of ANPR and reduces the numbers of cameras in our region. This approach has a positive impact on capital and annual revenue expenditure and reduces the privacy impact to the public.

The proposed ANPR sites form part of the overall WMP ANPR Strategy and as they are located on the strategic roads network will be of benefit from a national security perspective.

The new sites will help to complement the following WMP policing objectives in respect to ANPR:

- Increase public confidence and reassurance;
- Reduce crime and terrorism;
- Increase the number of offences detected;
- Reduce road traffic casualties;
- Increase efficiency of police resources.

An interesting outcome of our community consultation process for this project has been the community confidence and reassurance that has been captured as a result of our engagement and briefing strategy.

We have not only briefed the public and stakeholders about the proposed sites, but also informed and educated people about ANPR: why we use it; how we use it and how the data is stored and accessed.

Our strategic assessment highlighted 69,654 offences in the five year period that was analysed. The total recorded crime for the same period is just over one million offences (1,018,140) so the serious acquisitive crime types that were our focus reflect a small proportion of all crime at approximately 7 per cent.

Whilst these crime types may not seem statistically significant, they remained our focus due to their links to serious, organised or large scale crime. The effect of this criminality on individuals and families can be devastating and the financial costs to businesses and insurance companies should not be underestimated.

ANPR technology is a key strategic, operational and intelligence tool to help to reduce these crimes and bring offenders to justice. WMP's strategic intent is to protect the public and reduce crime through the targeted use of number plate recognition systems. There is a pressing social need to deploy ANPR cameras highlighted in this report.

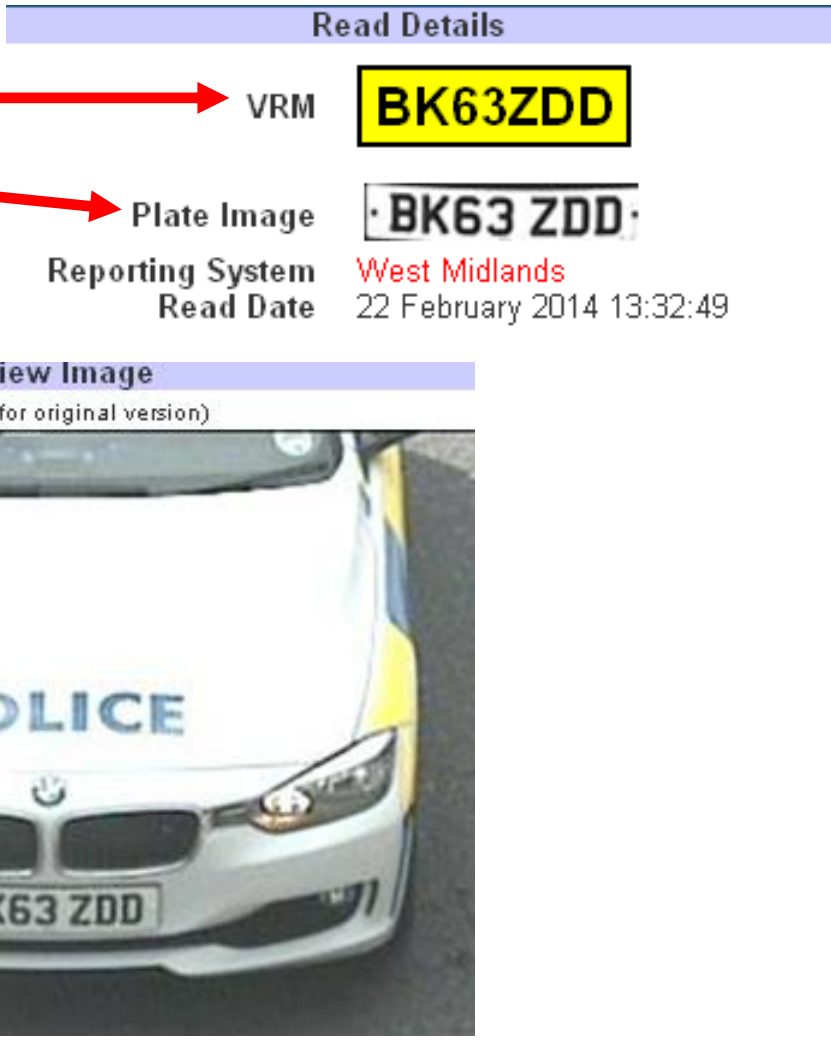
Traffic Volumes per Proposed Location:

	Location	LPU	West Midlands Police [redacted]	Average daily traffic flow
1	[redacted]	[redacted]	[redacted]	[redacted]
2	[redacted]	[redacted]	[redacted]	[redacted]
3	[redacted]	[redacted]	[redacted]	[redacted]
4	[redacted]	[redacted]	[redacted]	[redacted]
5	[redacted]	[redacted]	[redacted]	[redacted]
6	[redacted]	[redacted]	[redacted]	[redacted]
7	[redacted]	[redacted]	[redacted]	[redacted]
8	[redacted]	[redacted]	[redacted]	[redacted]
9	[redacted]	[redacted]	[redacted]	[redacted]
10	[redacted]	[redacted]	[redacted]	[redacted]
11	[redacted]	[redacted]	[redacted]	[redacted]
13	[redacted]	[redacted]	[redacted]	[redacted]
14	[redacted]	[redacted]	[redacted]	[redacted]
16	[redacted]	[redacted]	[redacted]	[redacted]
19	[redacted]	[redacted]	[redacted]	[redacted]
20	[redacted]	[redacted]	[redacted]	[redacted]

Storage of ANPR Data from Proposed Sites:

ANPR files consist of 3 elements:

1) Read Data, including time, date and location
2) Number Plate Image
3) Overview Image



[redacted]

[redacted]

There are very strict protocol guidelines about who accesses ANPR data in WMP – a copy of the protocol is included in Section 11 of this document.

Provisions for Collection, Use and Deletion of ANPR data.

As a vehicle passes an ANPR camera, its registration number (VRM) is read and forwarded to a local database where it is instantly checked against database records of vehicles of interest and stored to enable later research. If the number is for a vehicle of interest (VOI) details can be passed to Police officers who can intercept and stop a vehicle, check it for evidence and, where necessary, make arrests. In addition to the 'read' data images of the number plate (plate patch) an overview of the front of the car is obtained when a VOI has been captured and forwarded to the local database.

In addition, a copy of the read data together with the plate patch is forwarded electronically to the National ANPR Data Centre (NADC) where details are also stored to enable later research. The VRM read by the ANPR camera is also checked against lists of VOI that have been placed on the NADC by other LEA. If the VRM is matched against any of those lists then the LEA submitting the list is also provided with details of the VRM read together with the time, date and location of the read.

Data held both locally and on the NADC may be researched for investigation purposes within clear rules described within National ANPR Standards for Policing (NASP). NASP also includes requirements for audit of access to data.

These rules include 'user defined' permissions to access data based upon a person's role and requirements for prior authorisation of searches based on the type of investigation being undertaken and the length of time that has passed since the collection of data.

Rules and procedures are in place to ensure compliance with the data access and audit requirements of NASP.

ANPR data is retained both locally and nationally for a period of 2 years before it is deleted.

Provisions are in place to ensure compliance with the Risk Management and Accreditation Document Set (RMADS) and for securing data accuracy and security in accordance with NASP.

Consultation Process:

Internal:

The WMP ANPR Strategy Board (chaired by ACC Operations) commissioned the strategic analytical product that influenced our decision making process regarding the proposed ANPR locations.

This Board comprises members from: CID; Intelligence; Central Motorway Police Group; Operations; ICT; Professional Standards and the West Midlands Counter Terrorism Unit.

The West Midlands police force comprises 10 local policing units (LPUs). The proposed ANPR locations are [redacted] LPUs. The Chief Supt in command of these LPUs was contacted by the ANPR Strategy Board and made aware of the force-wide project. They were asked to nominate a member of their Senior Leadership Team who would be point of contact for the project – this individual would be a Chief Inspector or Supt (or Police Staff equivalent).

The WMP ANPR Manager visited all [redacted] LPUs and liaised with the nominated point of contact. A briefing took place which consisted of an overview of the force-wide project and site specific information pertinent to the LPU (Sections 2 – 7 of this file show the detailed maps that were provided to LPUs). A PowerPoint presentation was also provided which could be used for internal briefing to LPU officers and staff.
It was stressed that this document could also be utilised for emails and meetings with external stakeholders and members of the public. WMP believe that this document is very informative and illustrates a level of transparency with regard to the use and deployment of this technology.

WMP colleagues in ICT were also briefed about the new ANPR installations, specifically: network services; ANPR BOF Administrator and Senior Database Administrator.

The ANPR Manager also met with the Force Data Protection Manager to brief her on the project, the strategy behind ANPR site selection, the privacy impact assessment and the community consultation phase.

Finally, the Corporate Communications Department was engaged to discuss a communication strategy which includes a Press Release and new ANPR pages on the WMP external website.

External:

Each Chief Supt from the [redacted] LPUs was tasked to undertake a community consultation process regarding the proposed ANPR sites. This briefing was not only to inform stakeholders about the project but as important was to improve the understanding of ANPR and why we use it, how we use it and how we will protect the data that is captured by the cameras.

We are very pleased with the outcome of the consultation process, a record of which is included in Sections 2 – 7 of this file.

One query that was replicated from different stakeholders was that if the cameras are to be moved in the future would a similar engagement process be undertaken. WMP gave assurances that no ANPR camera would be relocated to a new location without consultation with the community.

Privacy Risks			
Risk	**Solution**	**Result**	**Evaluation**
The deployment of ANPR at a location is not proportionate	Assessment of 'Pressing Need' supported by a detailed strategic assessment, decisions taken following consultation and consideration of all issues.	Risk reduced	A robust assessment process for infrastructure development provides a proportionate response to the aims of the project taking account of any privacy concerns.
Individuals not involved in criminal activity consider the new ANPR deployments as unjustified intrusion on their privacy.	Transparency in regard to ANPR with provision of information concerning why it is needed and how it is used provided via Internet sites and written communication. Access controls in place in accordance with NASP.	Risk reduced	Increased awareness of how ANPR is used and the controls in place to prevent misuse will reduce concerns.
Action taken as a result of ANPR 'hits' from a camera may be seen as disproportionate, or the VRM may have been mis-read.	Management controls in place to ensure use is in accordance with NASP. Robust process for managing lists of vehicles of interest to ensure that data for circulated vehicles remains accurate and relevant. Ensure compliance with NASP for system performance.	Risk reduced	Efficient business process will reduce the likelihood of inaccurate data and compliance with policy on use will ensure that use is proportionate.
Inappropriate disclosure of data	Data is only shared and accessed in accordance with NASP. Provisions for monitoring and audit of data access and use in place.	Risk reduced	Compliance with business rules provides safeguards to prevent misuse and enable the benefits from the development to be realised.
Excessive data is collected	ANPR is only deployed where a pressing need has been identified. The continued requirement will be reviewed in accordance with NASP. Retention and disposal of data is in accordance with NASP.	Risk eliminated	Compliance with NASP ensures that data is collected and managed in accordance with agreed national standards. This should be measured against the success criteria identified at the outset, pressing need should also be kept under review.
Data is retained longer than necessary	Compliance with NASP regarding retention and disposal of data.	Risk eliminated	Compliance with NASP ensures that data is collected and managed in accordance with agreed national standards.

Deployment will be considered disproportionate and subject to complaint to ICO.	Compliance with national guidance for the development of ANPR infrastructure. Decisions taken following strategic assessment taking account of identified privacy concerns identified through timely consultations with appropriate groups and individuals.	Risk accepted	Decisions regarding deployment are taken following proper assessment, nonetheless it is recognised that some may disagree with the decisions and the opportunity for review by the ICO is an essential safeguard.
ICO may determine that deployment is inappropriate leading to sanctions.	Compliance with national guidance for the development of ANPR infrastructure. Decisions taken following strategic assessment taking account of identified privacy concerns identified through timely consultations with appropriate groups and individuals.	Risk reduced	A robust development and review process reduces the likelihood of ICO review concluding that the deployment of infrastructure at a location is inappropriate.

Privacy Risks Solution Approval		
Risk	**Approved Solution**	**Approved by**
The deployment of ANPR at a location is not proportionate	Assessment of 'Pressing Need' supported by a detailed strategic assessment, decisions taken following consultation and consideration of all issues.	
Individuals not involved in criminal activity consider the new ANPR deployments as unjustified intrusion on their privacy.	Transparency in regard to ANPR with provision of information concerning why it is needed and how it is used provided via Internet sites and written communication. Access controls in place in accordance with NASP.	
Action taken as a result of ANPR 'hits' from a camera may be seen as disproportionate.	Management controls in place to ensure use is in accordance with NASP. Robust process for managing lists of vehicles of interest to ensure that data for circulated vehicles remains accurate and relevant.	
Inappropriate disclosure of data	Data is only shared and accessed in accordance with NASP. Provisions for monitoring and audit of data access and use in place.	
Excessive data is collected	ANPR is only deployed where a pressing need has been identified. The continued requirement will be reviewed in accordance with NASP. Retention and disposal of data is in accordance with NASP.	
Data is retained longer than necessary	Compliance with NASP regarding retention and disposal of data.	
Deployment will be considered disproportionate and subject to complaint to ICO.	Compliance with national guidance for the development of ANPR infrastructure. Decisions taken following strategic assessment taking account of identified privacy concerns identified through timely consultations with appropriate groups and individuals.	
ICO may determine that deployment is inappropriate leading to sanctions.	Compliance with national guidance for the development of ANPR infrastructure. Decisions taken following strategic assessment taking account of identified privacy concerns identified through timely consultations with appropriate groups and individuals.	

Integration of Privacy Solutions into the Project		
Action to be taken	**Date for Completion**	**Allocated to**
Assessment of 'Pressing Need' supported by a detailed strategic assessment, decisions taken following consultation and consideration of all issues.	Completed	Force Intelligence Dept (strategic assessment) LPU SLTs (consultation)
Transparency in regard to ANPR with provision of information concerning why it is needed and how it is used provided via Internet sites and written communication. Access controls in place in accordance with NASP.	Completed	Supt – Operations ANPR Manager Corporate Comms Dept
Management controls in place to ensure use is in accordance with NASP. Robust process for managing lists of vehicles of interest to ensure that data for circulated vehicles remains accurate and relevant.	Completed	ANPR Manager
Data is only shared and accessed in accordance with NASP. Provisions for monitoring and audit of data access and use in place.	Completed	ANPR Manager
ANPR is only deployed where a pressing need has been identified. The continued requirement will be reviewed in accordance with NASP. Retention and disposal of data is in accordance with NASP.	Completed	Supt – Operations ANPR Manager
Compliance with NASP regarding retention and disposal of data.	Completed	ANPR Manager
Compliance with national guidance for the development of ANPR infrastructure. Decisions taken following strategic assessment taking account of identified privacy concerns identified through timely consultations with appropriate groups and individuals.	Completed	Supt – Operations ANPR Manager LPU SLTs
Compliance with national guidance for the development of ANPR infrastructure. Decisions taken following strategic assessment taking account of identified privacy concerns identified through timely consultations with appropriate groups and individuals.	Completed	Supt – Operations ANPR Manager LPU SLTs