

Self assessment tool for Automatic Number Plate Recognition

How well does your organisation comply with the 12 guiding principles of the surveillance camera code of practice?

Complete this easy to use self assessment tool to find out if you do.

Using this tool

This self assessment tool will help you and your organisation identify if you're complying with the principles in the code. It should be completed in conjunction with the surveillance camera code of practice (<https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>). The tool will help you show how well you comply with each principle. It is possible to be largely compliant with some principles and to fall short against others. As a result you will note that at the end of the questions against each principle there is a space to include an action plan. This is to enable you to put actions in place over the next year to improve your compliance to that principle. These boxes can also be used to make a note of what evidence you could produce if required to show your compliance to that principle.

Use of ANPR by Law Enforcement Agencies (LEA), which include police forces, is subject to National ANPR Standards for Policing (NASP). NASP includes standards that support the principles of the code and compliance with NASP is a good indication of compliance with the code. Police forces and other LEA should consider this tool as part of any review of compliance with NASP and publish the result to aid transparency and accountability. Some parts of NASP may be relevant to other users of ANPR and are available at www.npcc.police.uk/anpr.

The tool contains a combination of open and closed questions. For the open questions there is a limit on how much you can write, so please feel free to include any additional notes as an annex to the document – there are additional blank pages at the end of the tool.

We do not want you to send the self assessment response to us. However, in the interest of transparency we encourage you to publish the self assessment on your website.

The self assessment is for you to satisfy yourself and those that you surveil that you meet the principles and identify any additional work to show compliance.

We would like you to let us know that you have completed this document as this will enable us to understand the level of uptake. Also please let us know if you will be interested in working towards certification against the surveillance camera code of practice in the near future or just be added to our mailing list.

PLEASE COMPLETE ALL QUESTIONS

Please forward any feedback to scc@sccommissioner.gsi.gov.uk

Principle 1

Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.

Standards for ANPR infrastructure development and use are included within NASP Part 2 Section 7. Compliance with NASP is indicative of compliance with Principle 1.

1. Have you translated principle 1 into clear objectives to meet your pressing need? Yes No
If so what are they?

Support for Counter Terrorism due to the number of Military personnel living in Blandford and nearby Military camp.
Support and protection to the town's local community in the summer months when an increase in visitors to the area contributes to a rise in crime.
Protection against the growing number of vehicles entering the town linked to Drugs.
Protection of local economy and shopkeepers against shop theft linked to traveling criminality.
To assist in identifying vehicles used by Drink and Drug drivers, to protect the local community.

2. Have you considered the requirement of the end user? Yes No

3. Is the system being used for any other purpose other than those specified? Yes No
If so please explain

Although it could be used if required to assist the Council with details of the types of vehicles entering the town if required to assist with traffic management issues.

4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 1? Yes No

Action plan

Principle 2

The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.

Standards for ANPR infrastructure development and use are included within NASP Part 2 Section 7. Compliance with NASP is indicative of compliance with Principle 2.

1. Do you review your system regularly? Yes No
2. Have you conducted privacy impact assessments? Yes No
3. Do you publish your privacy impact assessments and reviews? Yes No
4. Do you feel there has been appropriate consultation in relation to your development of ANPR infrastructure? Yes No
5. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 2? Yes No

Action plan

All Police camera locations are reviewed regularly with regards to volumes of data and volumes of "vehicles of interest" to justify their continued existence.
PIAs previously conducted across Dorset by Police using Wessex FM and Dorset Echo with only positive feedback. All available on Dorset Police website.
Publication of camera details on Blandford Forum Town Council website.

Principle 3

There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.

1. Do you publicise the use of ANPR cameras in your area? Yes No
2. Do you identify the point of contact for information and complaints? Yes No
3. Does your publication of information include the procedures and safeguards that are in place, impact assessments undertaken, performance statistics and other management information? Yes No

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4. Do you have a complaints procedure in place? Yes No
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5. Do you make the public aware of how to escalate complaints? Yes No
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6. Is there a defined time scale for acknowledging and responding to complaints and is this conveyed to the complainant at the outset? Yes No
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7. Do you publish the number and nature of complaints received?
(NB Police forces professional standards departments, or local equivalents, are likely to provide for the appropriate receipt and management of complaints.) Yes No
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8. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 3? Yes No

Action plan

Dorset Police Website details full complaints procedures, contacts details etc

Principle 4

There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.

Standards for ANPR infrastructure development and use are included within NASP Part 2. Compliance with NASP is indicative of compliance with Principle 4.

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1. What arrangements are in place to provide clear responsibility and accountability?

Fully NASP compliant, data is archived in a protective secure data storage with access only by a limited number authorised Officers and Staff, with all systems audited and monitored. Authorised Officers and Staff have all been trained.

Data will only be stored for 12 months from 1st April 2018 and then deleted.

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2. Are all staff aware of their responsibilities? Yes No
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3. Please explain how you ensure the lines of responsibility are adhered to.

Dorset Police ANPR system is fully auditable and details all users keystrokes. The whole system is monitored and users are dip sampled and asked to prove their justification for their use of the system. Failures to do so can result in breaches of discipline and prosecution under the Data Protection Act or similar.

4. If you share ANPR infrastructure, is it clear what each partner organisation is responsible for and what the individual obligations are? Yes No

5. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 4? Yes No

Action plan

The Town Council is the purchaser, and therefore owner, of the system and Dorset Police manages the system.

Principle 5

Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.

Standards for ANPR development and use are included within NASP Part 2 and Part 3. Compliance with NASP is indicative of compliance with Principle 5.

1. Do you have clear policies and procedures which help ensure that any legal obligations affecting the use of such a system are addressed? Yes No

If so please specify.

Force ANPR Policy document
Force ANPR Working Practices document
Force Control Room Policies

2. Do users receive training appropriate to their role? Yes No

3. How do you ensure that all system users remain up to date and compliant with relevant operational, technical, privacy considerations, policies and procedures?

Regular updates to any relevant policies or procedures would be notified to all on a force wide weekly update electronic noticeboard system.
Changes to operational systems are sent to individual users by e-mail from the system's internal list of users and reflected in training documentation.

4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 5? Yes No

Action plan

Principle 6

No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.

Standards for management and use of ANPR data are included within NASP Part 2 and Part 3. Compliance with NASP is indicative of compliance with Principle 6.

1. On what basis is the ANPR data retained and for how long?

Majority of Dorset cameras are 3G operated and don't have images. Currently in line with Home Office NPCC and Information Commissioner guidance, all textual data is held for 24 months. Images of innocent vehicles of no interest to the Police are weeded from the system at 12 months with all other data deleted at 24 months.
Recent changes have brought ANPR data in line with other personal Police data and so effective from 1st April 2018, this retention period will reduce to 12 months. System has automated filters which are set to do this.

2. Do you have an auditable process for reviewing ANPR data (including images) and managing their retention? Yes No

3. Are there any time constraints in the event of the enforcement agency not taking advantage of the opportunity to view the retained ANPR data? Yes No

4. Are there any time constraints which might affect external parties from viewing the ANPR data? Yes No

5. Do you quarantine all relevant ANPR data relating to a reported incident until such time as the incident is resolved and/or all the ANPR data have been passed on to official third parties? Yes No

6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 6? Yes No

Action plan

Principle 7

Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.

Standards for management and use of ANPR data are included within NASP Part 3. Compliance with NASP is indicative of compliance with Principle 7.

1. Do you have a policy on who has access to the stored information? Yes No

2. Do you have a policy on disclosure of information? Yes No

3. What checks do you have in place to ensure that the disclosure policy is followed?

The system will automatically not allow Police officers or staff to print another force's ANPR data for evidence without first contacting that force for protecting DPA principles. Coupled to this, local users are all trained in disclosure of ANPR data. Only trained and authorised Police Officers and Staff have access, currently around 350 people (14% of the force).

4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 7?

Yes No

Action plan

Principle 8

Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.

Standards for development, management and use of ANPR are included within NASP Parts 1, 2 and 3. Compliance with NASP is indicative of compliance with Principle 8.

1. What approved operational, technical and competency standards relevant to a surveillance system and its purpose does your system meet?

NASP

2. How do you ensure that these standards are followed appropriately?

Regular health checks of all cameras, monitored daily, twice annual visits to ensure lenses are cleaned and all ok.
Only NASP compliant cameras are purchased ensuring cameras are compliant from the start.

3. What steps are in place to secure certification against the approved standards?

Only NASP compliant cameras are purchased ensuring cameras are compliant from the start.

4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 8?

Yes No

Action plan

Principle 9

Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

Standards for management and use of ANPR are included within NASP Parts 1, 2 and 3. Compliance with NASP is indicative of compliance with Principle 9.

1. What security safeguards do you have in place to ensure the integrity of images and information?

Data is passed encrypted into the secure Police network where it is stored in a secure server with limited access as detailed previously

2. If the system is connected across an organizational network or intranet, do sufficient controls and safeguards exist? Yes No

3. What is the specified purpose for which the information is being used and accessed and is this consistent with the stated purposes?

Policing purposes

4. Do you have preventative measures in place to guard against misuse of data and images? Yes No

5. Are your procedures and instructions and/or guidelines regarding the storage, use and access of surveillance system information documented? Yes No

6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 9? Yes No

Action plan

Principle 10

There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.

Standards for management and use of ANPR are included within NASP Parts 1, 2 and 3. Compliance with NASP is indicative of compliance with Principle 10.

1. Does your system have a review process that shows it still addresses the needs and delivers the benefits that justify its use? Yes No

2. Have you identified any cameras that do not remain justified in meeting the stated purpose(s)? Yes No

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3. Have you conducted an evaluation in order to compare alternative interventions to surveillance cameras? Yes No

If so please provide brief details.

Every site is considered for a variety of options as part of the initial scoping phase. Cameras are only selected if they meet the aim.

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4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 10? Yes No

Action plan

Principle 11

When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.

Standards for management and use of ANPR are included within NASP Parts 1, 2 and 3. Compliance with NASP is indicative of compliance with Principle 11.

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1. Are the ANPR data and images produced by your system of a suitable quality for the criminal justice system to use? Yes No

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2. Do you have safeguards in place to ensure the forensic integrity of the ANPR data and images including a complete audit trail? Yes No

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3. Do you have a policy on data storage, security and deletion? Yes No
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4. Is the information stored in a format that is easily exportable? Yes No
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5. Does the storage ensure the integrity and quality of original recording and the meta data? Yes No
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6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 11? Yes No

Action plan

Principle 12

Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

Standards for management and use of ANPR are included within NASP Parts 1, 2 and 3. Compliance with NASP is indicative of compliance with Principle 12.

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1. Do you have a policy in place to ensure that the information contained on your database is accurate and up to date? Yes No
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2. Do you have a procedure for deciding when and whether an individual or vehicle should be included in a reference database? Yes No
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3. What policies are in place to determine how long information remains in the reference database?

NIM policies and guidance, PNC Policy.

Vehicles for consideration of adding to a list of "vehicles of Interest" must be assessed in a NIM compliant format and follow appropriate review policies such as those set for automatic processing on PNC, i.e. both PNC and ANPR system hotlists will weed vehicles at a set time period in line with current national Home Office issued guidance.

4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 12?

Yes No

Action plan

Additional Information

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