National ANPR Standards for Policing and Law Enforcement

November 2024

Version: 3.3

1.   Executive Summary

These standards articulate the requirements with which the police and other Law Enforcement Agencies (LEA), as detailed at Annex A must comply to access the National ANPR Capability (NAC). These standards do not cover the use of Automatic Number Plate Recognition (ANPR) for any purpose that is not law enforcement and will identify the purposes for which this document shall be applicable. Data from the NAC may not be used for other purposes, however in appropriate circumstances a camera may provide data to both the NAC and organisations other than those listed at Annex A to be managed independently.

This document includes a description of the legal basis for ANPR as well as the applicability of these standards. The standards comprise three main sections: Data Standards, Infrastructure Standards and Data Access and Management Standards. Audit standards and technical requirements are covered in other documents.

Data Standards comprise the security requirements that must be met for the NAC as well as the composition requirements for read data.

Infrastructure Standards cover the end-to-end infrastructure requirements for the NAC, including infrastructure development, cameras, networks, databases, infrastructure access and performance and legal requirements.

Data Access and Management Standards include the management of data within the NAC, including collection, storage, transfer and deletion of data. This section also provides guidance on FOI and Data Protection Act (DPA) enquiries.

The Annexes to this document include password requirements, guidance on investigation categories, the approval process for accessing ANPR data and a list of approved organisations that may access ANPR.

2.   Contents

Document Revisions

Version 1.1 draft	July 2020	Change ref from CAST to DSTL in 8.14 Clarification at 9.8 re Command and Control Update of links within text
Version 2.0	September 2020	Published with amendments as above
Version 2.1	November 2020	Footnote added re data deletion (para 9.5.1)
Version 2.2	November 2021	Clarification of requirements for roadside camera mounting condition monitoring. (para 8.9.9) Addition of Food Standards Scotland as 'Approved LEA'
Version 2.3	January 2022	Scottish Environment Protection Agency added as 'Approved LEA'
Version 2.4	July 2022	Minor change to wording 9.4.3.2 Camera Locations in Evidence. Addition of The Pensions Regulator as an 'Approved LEA'
Version 3.0	January 2024	Revision to provide clarity and application of standards to a blend of local and national ANPR operational capability. Update Approved LEAs.
Version 3.1	February 2024	Detailed description of password requirements deleted
Version 3.2	May 2024	Addition of Serious Fraud Office (SFO) as an 'Approved LEA'
Version 3.3	October 2024	Additional details re VOI list management requirements. Update to ref UKGDPR Police Management Code of Practice. Reference to NSAP. Revision of section 9.13 re VOI list accuracy and deletion Addition of the Financial Conduct Authority (FCA) and His Majesty's Prison and Probation Service (HMPPS) as 'Approved LEA'

3.   Definitions

Acronym	Description
ANPR	Automatic Number Plate Recognition
ANPR Data	Includes the Vehicle Registration Mark (VRM) as interpreted by the ANPR System together with associated records of location of the ANPR camera that obtained the data together with details of the time of collection and any images associated with that data details at 7.3 and 7.4 post
ANPR READ	The interpretation of a VRM by an ANPR system with associated reference to time and location.
ANPR system	A collection of cameras, readers components linking to NAC
Audit Standards	National Standards for Compliance and Audit of Law Enforcement ANPR
CCTV	Closed Circuit Television
CAMERA	The device used to capture an ANPR read
CAPTURE RECORD	The record of a vehicle recorded by NAC for a vehicle passing an ANPR camera including the ANPR READ, associated images and meta data.
COMMUNICATIONS LINKS	The connections between the camera, any local infrastructure and the NAC
CONTROLLER	The competent authority which alone or jointly with others determines the means and purposes of the processing of personal data. Part 3 data Protection Act 2018
CCA	Crime and Courts Act 2013
CPIA	Criminal Procedure and Investigations Act 1996 and the CPIA Code of Practice
DPA	Data Protection Act 2018
FOI	Freedom of Information Act 2000
UKGDPR	General Data Protection Regulation
GSCP	Government Security Classifications Policy – (formerly the Government Protective Marking Scheme (GPMS)

GPS	Global Positioning System
HIT	The report of a match of a vehicle registration mark (VRM) READ with a VRM that is included on a vehicle of interest list (VOI)
ICO Code	[ICO Code of Practice for Surveillance Camera Systems](#)
ISO	Information Security Officer – The member of staff with responsibility for ensuring compliance with requirements for IT security
ITHC	IT Health Check – The process for ensuring that security provisions for IT are appropriate and in compliance with requirements that are current at the time of the check.
JCA	Joint Controller Arrangements under provisions of the Data Protection Act 2018-
JPEG	Joint Photographic Expert Group image format
LEA	Law Enforcement Agency – Includes police forces and other agencies undertaking law enforcement activities. For the purpose of this document, LEAs shall only include those organisations listed at Annex A.
MIDAS	Motor Insurance Bureau ([MIB](#)) data of uninsured vehicles
MOPI	[Police Information and Records Management Code of Practice](#)
NAC	National ANPR Capability includes: • the core NAS which is a national system consisting of the functionality to enable use for operational response, investigation and intelligence purposes and a national store of data, and, • any other national store of data provided for law enforcement purposes relating to terrorism and serious criminal offences. • The National Strategic ANPR Platform (NSAP) • local ANPR systems to enable use for operational response, investigation, and intelligence purposes, and, • the National ANPR Infrastructure (NAI) which is a network of ANPR cameras, communications links, firewalls and other related supporting components, which are the responsibility of LEAs, which connect to the NAC.

NAI	A network of ANPR cameras, communications links, firewalls and other related supporting components
NAS	The core National ANPR Service
NASP	National ANPR Standards for Policing first version published in 2013 and replaced by NASPLE recognising the applicability to all law enforcement agencies that access the NAC
NASPLE	National ANPR Standards for Policing and Law Enforcement.
National VOI List	Nationally circulated lists that include stolen vehicles, vehicles requiring an operational response and vehicles within Schengen circulations
Network Connections	The IT links between components of the NAC
NPCC	National Police Chiefs' Council
NPCC Vetting Policy	The NPCC standards for vetting of staff for access to police information
NSAP	National Strategic ANPR Platform
PERSONAL DATA	Means any information relating to an identified or identifiable living individual. 'identifiable living individual' means a living individual who can be identified directly or indirectly, in particular by reference to_ a) an identifier such as name, an identification number, location data or an online identifier, or b) One or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual Data Protection Act 2018
PDS	Police Digital Services - Responsible for confirming that police IT systems are in accordance with security requirements and authorising connection to national systems.
PNC	Police National Computer
READ	The interpretation of a VRM by an ANPR system
RIPA	Regulation of Investigatory Powers Act 2000
RIPSA	Regulation of Investigatory Powers (Scotland) Act 2000

Schengen	The Schengen Information System will enable the authorities of signatory countries to have access to reports on persons and objects for the purpose of border checks and controls and other police and customs checks
SMS	A Standards format for text messaging
TSpec	The document prescribing the technical specifications for data within the National ANPR Capability (NAC) to comply with the requirements of NASPLE.
VOI	The details of a vehicle that are of interest to law enforcement for operational response or investigation purposes that is included on a list to enable it to be READ and for authorised staff to receive a report of that READ.
VRM	Vehicle Registration Mark

4.   Introduction

The Home Office issues these standards on behalf of the Joint Controllers for the National ANPR Capability (NAC) in support of the management and use of the (NAC). ANPR by the police and other law enforcement agencies (hereafter referred to as LEAs) for law enforcement purposes. LEAs should use these policy standards to shape technical standards, standard operating procedures and audit standards in support of compliance.

This document covers the use of ANPR within the NAC and will identify for which uses this document shall be applicable. The use of ANPR within the NAC otherwise than in accordance with this document is not permitted.

This document is divided into 3 sections:

- Part 1 – Data Standards, which define the compliance requirements for ANPR Data

- Part 2 – Infrastructure Standards, which define the compliance requirements for ANPR infrastructure

- Part 3 – Data Access and Management Standards, which define the access requirements for LEAs and other organisations that are associated with ANPR data for law enforcement purposes.

5.   Background

ANPR technology is used for law enforcement purposes, to help detect, deter and disrupt criminality at a local, force, regional and national level. This includes tackling traveling criminals, Organised Crime Groups and terrorists. ANPR provides lines of enquiry and evidence in the investigation of crime and is used by LEAs throughout England, Wales, Scotland and Northern Ireland. In appropriate circumstances, and with compliance with data protection legislation, the NAC may also be available to Intelligence Services and the Crown Dependencies of the Channel Islands and the Isle of Man.

There exists a National Law Enforcement ANPR capability NAC which enables LEAs to benefit from operational use of ANPR. The NAC comprises:

- The primary NAS. This is a national system comprising standardised functionality to enable use for operational response, investigation and intelligence purposes and a national store of data;

- any other national store of data provided for law enforcement purposes relating to terrorism, serious criminal offences and where necessary and proportionate for other law enforcement purposes.

- The National Strategic ANPR Platform (NSAP)

- any national components to support the transfer of data including any data cache.

- local ANPR systems to enable use for operational response, investigation, and intelligence purposes, and,

- The National ANPR Infrastructure (NAI), which is a network of ANPR cameras, communications links, firewalls and other related supporting components. Any element of this network that is connected to the NAC shall be the responsibility of the LEA that manages that connection.

5.1   Technical Specifications

Technical specifications for the NAC are detailed within a technical specification document (TSpec). LEAs are required to conform to the requirements of that document.

6.   ANPR Legislation

ANPR operates under a complex framework of legislation of general application, including the Data Protection Act 2018, UK General Data Protection Regulation (UKGDPR), and Common Law.

The National Law Enforcement ANPR capability (NAC) is subject to the Information Commissioner's Office (ICO) regulatory provisions.

6.1.   ANPR Data: Legal Basis

ANPR data from police forces is police information within the meaning of The Code of Practice on the Police Information and Records Management Code of Practice 2023 (MOPI) made under the Police Act 1996 and Police Act 1997. It may be shared between LEAs in accordance with the provisions of that Code or any other document which applies similar standards in its place, including the National Crime Agency's (NCA) Statement of Information Management Practice (SIMP).

Access to and the retention and management of ANPR data obtained by LEAs must be compatible and consistent with their relevant legal obligations, which include: The Data Protection Legislation (i.e. the General Data Protection Regulations (UKGDPR) and the Data Protection Act 2018 (DPA);

- ICO Code of Practice for Surveillance Camera Systems (ICO Code);

- College of Policing Approved Professional Practice – Information Management. (MOPI);

- Part 2 of the Protection of Freedoms Act 2012 (PoFA);

- The Surveillance Camera Code issued under Part 2 of PoFA.

- Criminal Procedure and Investigations Act 1996 and Code of Practice issued under Part II of that Act (CPIA);

6.2.   Use of ANPR for Law Enforcement Purposes

ANPR infrastructure may only be deployed for law enforcement purposes as defined in Part 3 of the DPA ; or on grounds of national security. Law Enforcement is defined by the DPA as "the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal

penalties, including the safeguarding against and the prevention of threats to public security".

The Joint Controller Arrangements (JCA) details the responsibilities of controllers for compliance with the DPA. The National Police Chiefs' Council (NPCC) ANPR lead is designated as the lead controller within the JCA for the national components of NAC and for national policy. Local components of the NAC are the responsibility of the Chief Officer for the organisation that provides and manages that local component.

Joint Controllers have determined within the JCA that they will conform to consistent policy and procedures for the elements of the NAC for which their own LEA is responsible and for which they are the controller.

6.3. Use of ANPR for other Policing Purposes and Public Benefit

LEAs may the NAC for operational purposes relating to individual and public safety including in collaboration with other public authorities. For example, those partners with accountability for traffic management and road safety. Data may be processed independently by the LEA or other public authority using shared collection equipment (10.2.3 post) such that each are independent controllers for the processing that they undertake, or statistical information may be provided by the LEA devoid of personal data. In all cases a Memorandum of Understanding (MOU) must be in place setting out the arrangements for compliance with these standards.

6.4. ANPR Audit

The Home Office has also issued a separate document entitled "National Standards for Compliance and Audit of Law Enforcement ANPR" (Audit Standards). This document sets out the requirements for compliance and audit by all LEAs and of the national components of the NAC.

7.   Applicability

These standards apply to the NAC operated by LEAs that connect to or receive data from any other components of the NAC.

Where, under an agreement, LEAs receive data from components that are under the ownership or control of other organisations it is the responsibility of the receiving LEA to ensure compliance with the NASPLE.

ANPR cameras that are used solely for speed enforcement are outside the scope of these standards.

ANPR systems that are not operated by LEAs and do not submit data to the NAC are similarly outside the scope of these standards.

7.1.   Approved Organisations

An LEA may only connect to, or receive data from, the NAC following approval of the NPCC policing lead for ANPR within the NPCC Crime Operations Committee (NPCC policing lead for ANPR) - an "Approved Organisation".

For an organisation to be designated as an "Approved Organisation" it must be involved in and can lawfully process data for one or more of the following activities:

- National security and counter terrorism

- Law enforcement purposes namely the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security.

In granting access, the NPCC policing lead for ANPR must be satisfied that it is necessary and proportionate for the organisation to be approved.

Approved Organisations must ensure that their organisation complies with the requirements of NASPLE and Compliance and Audit Standards.

References to LEAs within NASPLE includes only "Approved Organisations" unless indicated otherwise. Approved Organisations are listed in Annex A.

In addition to the above purposes LEAs may use the NAC for operational purposes relevant to individual and public safety. E.g Missing persons.

8.   Part 1: Data Standards

8.1.1.   Data Standards Overview

Part 1 prescribes the data standards for the NAC.

8.1.2.   Data Security

LEAs have a duty to protect ANPR data to ensure its integrity and to maintain its value for law enforcement purposes. ANPR data must therefore be attributed a protective marking of OFFICIAL, in accordance with the Government Security Classifications Policy (GSCP).

When in the NAC databases is used, other material may be accessed such that personal details of persons associated with the ANPR READ data may be identified. Once ANPR READ data is available within the NAC, it is personal data in the context of the DPA.

All ANPR data in the national and local components of the NAC, should therefore be managed in accordance with DPA principles and handled as OFFICIAL - SENSITIVE data, in accordance with the GSCP.

Whilst in the custody of, or being transmitted to or from a LEA, ANPR data should be handled in accordance with Part 2 and Part 3 of NASPLE.

Access to data within ANPR systems must be in accordance with Part 3 of NASPLE.

8.2.   ANPR Read Records

8.2.1.   Composition

An ANPR READ places a VRM at a specific location and time. It is obtained by a camera as part of an automatic number plate reading system. The data components of a record must not be entered manually into the NAC unless for the purposes of correcting a mis-read VRM on the system or by an administrator for testing the connectivity of a camera.

The READs must include VRM, time, location of read and camera identifier and be consistent with the requirements of section 8.4.

8.3. ANPR Data

8.3.1. Vehicle Registration Mark (Mandatory)

ANPR data must accurately represent VRMs of all vehicles with correctly represented EU and Schengen Community number plates. Systems must accurately record the VRM for vehicles passing within the field of view for each camera. The capture and read rates must be in accordance with the type of camera defined at Section 9.7.

8.3.2. Vehicle Registration Mark – Not Read (Mandatory where functionality is in place)

Where a CAMERA has the capability to record images of vehicles passing within the field of view where no VRM is identified by the system, information will be recorded in the VRM field in accordance with current TSpec.

8.3.3. Time (Mandatory)

System audit provisions must provide evidence of synchronisation at least once every 10 minutes using standard time source techniques in accordance with current TSpec.

Components of ANPR systems must automatically adjust the display of the time to daylight saving time during the period when this is in-force.

8.3.4. Location (Mandatory)

ANPR data must place a read in a location, accurate to within 10 metres. In addition, all fixed-site ANPR cameras must have their GPS co-ordinates accurately recorded to within 5 metres.

8.3.5. Supporting Imagery

In order to assist with assessment of the accuracy of individual read records, ANPR data may include images:

• Plate patch – showing the number plate only, to allow comparison of the visual image with the textual representation interpreted (Mandatory for systems under ownership or control of a LEA)

• Overview Image – showing the vehicle to allow identification of the make, model and colour of the vehicle within the read zone (Optional)

• 'Geo Tagging' - if an accurate GPS Geo Location is available, then this detail may be added to images (Optional)

Should any image be found to exceed prescribed limits for image size, cameras submitting the images must be revised to ensure images obtained are within the limits prescribed within a maximum of 7 days.

All images must be linked to the corresponding read record.

All images recorded must be forwarded to the national databases of the NAC. Where no overview image has been recorded, the read record must include a reference to identify that no image is recorded.

8.4 Record Retention and Deletion

All read records received by LEAs including any associated images must be supplied to the national databases of the NAC.

All records must be managed and subsequently deleted in accordance Section 10.6.

8.5 Camera Performance Evaluation

Camera Performance evaluation, as detailed in Section 9.14 of all components within LEA ANPR systems must be conducted to ensure compliance with the Data Standards. Where performance falls below the Data Standards then this must be corrected and reassessed to confirm that performance conforms to data standards, within 30 days of that issue being identified.

If camera performance issues are not resolved within 30 days of identification, then the feed of data from those cameras must cease until corrected.

9 Part 2: Infrastructure Standards

9.1 Infrastructure Standards Overview

Part 2 prescribes the standards for the components of the NAC, including the operability standards required that are to be used by LEAs connected to it.

9.2 Accreditation

To preserve the integrity of the NAC, all components of infrastructure that connect to it must be assessed to ensure that they do not pose a threat to the NAC and are suitably for handling data up to GSC OFFICIAL level.

9.3 LEA Domain

The assessment of risk to an LEA domain rests with the controller for each LEA, which will normally be discharged by the Information Security Officer (ISO) for that LEA. The level of risk posed should be determined through completion of a Risk Analysis Document and an IT health check (ITHC). Review of compliance with the risk analysis outcomes and the conduct of an ITHC is to be completed annually.

9.4 ANPR Network

Police Digital Services (PDS) as the National Accreditor for Police Systems (NAPS), needs to be assured that the local LEA Infrastructure poses no threat to NAC. The NAPS will liaise with the LEA ISO to assess the level of risk posed, as documented through the LEA corporate information risk management and ITHC process.

The PDS will approve the components of local infrastructure for connection to the ANPR Network. This will be confirmed by the completion of the relevant security assurance processes as determined by PDS.

9.5 ANPR Infrastructure Development

A consistent and standardised approach must be applied to infrastructure development within the NAC. Compliance with Technical Specifications and any requirements to support consistency in configuration of components within the NAC is required.

Police Forces and LEAs are responsible for ensuring that any proposed deployment of additional static ANPR cameras within their area, is appropriate taking account of data protection legislation and these standards. LEAs must ensure that current infrastructure within their area is managed in compliance with these standards before deploying any additions to the NAC.

9.5.1   Strategic Assessments

A strategic assessment should be carried out prior to the deployment of an ANPR camera. An assessment should also be carried out prior to receiving ANPR data for onward submission to any component of the NAC, that is received from ANPR systems operated by organisations that are not defined as LEAs. These assessments must identify a need for ANPR at that location for law enforcement purposes.

Where a need is identified, consideration of whether the deployment, or the receipt of ANPR data is appropriate and proportionate. This requires an assessment of the value for law enforcement purposes taking account of the impact on fundamental rights and freedoms of individuals. Consideration of the legitimate expectations of individual privacy is also required. Strategic assessment should consider:

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

9.5.2   Data Protection Impact Assessment

A Data Protection Impact Assessment (DPIA), which may include consultations with relevant stakeholders, is required for all planned new infrastructure.

The DPIA must include:

• A description of the proposed development
• An assessment of the risks to the fundamental rights and freedoms of individuals – the data subjects.
• Measures to mitigate those risks
• Confirmation of safeguards and security measures to ensure protection of personal data and compliance with the DPA.
• Details of any stakeholder consultation

9.5.3   Information Commissioner's Office Consultation

The NAC may result in high risk to the rights and freedoms of individuals and prior consultation with the Information Commissioner's Office (ICO) may be required before the deployment of any new ANPR infrastructure. When a DPIA identifies a large increase in the number of deployed ANPR

infrastructure or where significant privacy risks are identified the ICO should be consulted. (Section 64 DPA)

The advice of data protection specialists within the LEA should be obtained when assessing the data protection risks and the need for consultation.

9.5.4 Strategic Assessment and DPIA Reviews

LEAs must monitor the continued requirement for a camera to be maintained at a location, or for an LEA to receive data from ANPR systems operated by other organisations. Should the justification for deployment at that location cease, the device must be removed, and the receipt of data must be terminated.

The locations of all cameras and the need to receive data from systems operated by other organisations must be reviewed annually, considering requirements for infrastructure development to ensure that camera deployment or receipt of data remains appropriate and proportionate

LEAs must ensure that Strategic Assessments and DPIA are reviewed at least annually and maintain a record of that review.

9.6 Vehicle-Mounted Systems

Vehicle-mounted ANPR may only be deployed where any of the following circumstances arise:

- For the purposes of monitoring hits against a list of VOI with the intention that an operational response to the hit will take place, either by staff within the vehicle containing the ANPR system or by others deployed in support of that vehicle for the purpose of providing a response.

- Deployed at locations identified following completion of infrastructure development assessment prior to the deployment of other camera at the location.

- Deployed as a result of Operational tasking processes within an LEA where it has been determined that it is proportionate for short-term deployment of ANPR;

- In response to identified criminal activity

- In response to identified community problems

- To support assessment of a location for future more permanent camera deployment in accordance with the infrastructure development procedure

- In support of immediate operational response following report of a crime or incident.

9.7 System Standards

The performance standards for camera shown below are most easily met for vehicles travelling towards a camera, and it is recommended that unless unavoidable, for example in some dual-lane deployments, that this configuration is used in all cases.

9.7.1 Static ANPR Systems

A static ANPR system has been built for the primary purpose of 'capturing' and 'reading' VRMs and is located in a fixed position, with no intention of the system being moved. The performance standards for these systems must be achieved at all times. Systems must capture 98% of all VRM that meet the reflective requirements detailed within the BS AU 145 (as related to the age of the plate) and are visible to the human eye[1] and accurately read 95% of captured VRM.

9.7.2 Moveable ANPR Systems

A moveable ANPR system has been built for the primary purpose of 'capturing' and 'reading' VRMs, is located in a fixed position on a temporary basis and may be moved. The performance standards for these systems must be achieved at all times. Systems must capture 98% of all VRM that meet the reflective requirements detailed within the BS AU 145 (as related to the age of the plate) and are visible to the human eye and accurately read 95% of captured VRM.

9.7.3 Multi-Lane ANPR Systems

A Multi-Lane ANPR system has the capability to read VRM for vehicles travelling in multiple lanes of the highway using a single camera. The performance standards for these systems must be achieved at all times. For vehicles travelling towards the camera, systems must capture 98% of all VRM that meet the reflective requirements detailed within the BS AU 145 (as related to the age of the plate) and are visible to the human eye and accurately read 95% of captured VRM.

For vehicles travelling away from the camera, the system must capture 90% of all VRM that are visible to the human eye and accurately read 95% of captured VRM.

---

[1] 'Visible to the Human eye' should be determined from the viewpoint of the camera within the ANPR system. A number plate visible to a 'human eye' at that location should also be visible by the ANPR system taking account of circumstances prevailing at the time including adverse weather conditions.

9.7.4 CCTV Integrated ANPR Systems

A CCTV Integrated ANPR system may operate both as a CCTV camera and as an ANPR camera. The camera should be optimised[2] for the purposes of ANPR when being deployed as a camera. Integrated systems must only provide data to the other components of the NAC when in ANPR mode. The performance standards for these systems must be achieved at all times when deployed in ANPR mode. CCTV systems may not be optimised to capture ANPR reads therefore systems must capture 85% of all VRM that meet the reflective requirements detailed within the BS AU 145 (as related to the age of the plate) and are visible to the human eye and accurately read 95% of captured VRM.

9.7.5 Mobile ANPR Systems

A mobile ANPR system has been built for the primary purpose of 'capturing' and 'reading' VRMs. These include vehicle-mounted ANPR systems and other portable systems deployed on a temporary basis. Any equipment procured after the publication of version 1 of National ANPR Standards for Policing (NASP) (May 2013) must be live-linked to the other components of the NAC.

To achieve the optimum performance requirements, mobile equipment should be capable of night-time and low-light operation. The performance standards for these systems must be achieved at all times.

Systems must capture 98% of all VRM that are visible to the human eye and accurately read 95% of captured VRM unless deployed in a moving vehicle, when the system must capture 80% of all VRM that meet the reflective requirements detailed within the BS AU 145 (as related to the age of the plate) and are visible to the human eye and accurately read 95% of captured VRM.

9.7.6 Covert Systems

It is recognised that circumstances may arise where moveable or purpose-built, covert systems are deployed in support of an investigation in circumstances where it is not possible to establish a live-link to other components of the NAC. Deployments of this type that are authorised within provisions of the RIPA or RIPSA are the only circumstances where

---

[2] The optimum configuration of CCTV systems differs when used for general CCTV surveillance to when operated as an ANPR reader. It needs to be configured for ANPR use to ensure maximum possible data accuracy

equipment procured after the publication of version 1 of NASP (May 2013) may not have the capability to live-link to the NAC.

Unless unachievable due the nature of the deployment the performance standards for these systems must be achieved at all times. Systems must capture 98% of al VRM that are visible to the human eye and accurately read 95% of captured VRM.

9.8   Camera Access Settings

Unless a camera is designated a 'Restricted Access' camera, all cameras that submit data to NAC must be attributed the settings of 'Open Access', such that all data received from that camera is visible to all users with appropriate permissions to access the data.

With appropriate authority, a camera may be designated a 'Restricted Access' camera. Designation of a camera for 'Restricted Access' may only be authorised by a senior manager. A 'Restricted Access' camera may or may not be covert and the designation of a device for 'Restricted Access' may require authorisation within the provisions of the RIPA or RIPSA.

A record of all authorisations for restricted access must be retained for the duration of the restriction and a period of 2 years thereafter.

9.9   System Capability and Resilience

9.9.1   Image Capture

All cameras under the ownership or control of LEAs must have the capability to capture and record supporting imagery in accordance with section 8.4.5.

There may be circumstances where the shared collection equipment that is owned and managed by a non-LEA organisation is being used that are not enabled for the recording of imagery. In these circumstance, these cameras may be connected to the NAC subject to the standards for ANPR Infrastructure Development.

Supporting Images are important to assist with the accuracy of individual capture records and therefore, where data is received from other a non-LEA organisation without supporting images, provision for upgrading of the system to enable the provision of images should be established.

9.9.2   Schengen Information Systems (SIS)

All ANPR systems must be capable of reading plates that form part of the SCHENGEN community.

9.9.3   Data Storage

The NAC must not allow any data loss. Data may be held in approved national data stores that provide for user access and in any cache to support transfer and managed in compliance with these standards.

9.9.4   Local System Resilience

All local ANPR systems must transfer data to the national components of the NAC on receipt in local systems from a camera and also have the capacity to retain ANPR reads and their related images for 7 days from the time of the ANPR read in a format that will enable submission to the national components of the NAC.

This will provide resilience should the local infrastructure connections, the NAC or communications to the national components of the NAC become unavailable and will prevent the loss of data. In the event of a failure to send read records and associated images to the national components of the NAC local systems must have the capability to re-send that data.

If for any reason reads from a camera are submitted to the local system more than 7 days after initial capture the reads may be retained on the local system for 7 days in a format that will enable submission to the national components of the NAC to prevent loss of data, should connection to the national components of the NAC become unavailable.

9.9.5   Local system connection and data transfer

Local ANPR systems must not enable connection to or the transfer of data to local ANPR systems operated by other LEA for the purposes of searching of data or monitoring of VOI lists created and managed by other LEAs, Access to data from other LEAs and VOI lists is provided from national components of NAC and in compliance with data protection principles additional local copies of other LEAs data is not permitted. except that VOI lists may be transferred to Mobile ANPR Systems to enable monitoring by those systems when not connected to the NAC. LEAs must establish procedures to ensure that VOI lists held on Mobile ANPR Systems are current versions of lists as required by 9.13.3 (post)

LEAs may, in partnership, establish a single shared local component of the NAC to enable use by their staff for for operational response, investigation, and intelligence purposes provided that system is not connected to any other local system.

LEAs must not disclose VOI lists to other LEAs for use on local components of the NAC, even in circumstances of national components of the NAC unavailability; however, LEAs may share information and intelligence relating

to those VOI lists using established intelligence management procedures. Where LEAs receiving intelligence reports have an interest in the vehicles subject to those reports they may include details of VOI within their own VOI lists and are accountable for the management of those lists.

9.9.6   Local system data deletion

Data held on local systems must be deleted within the next 24 hours after the period of 90 days following the time of the read. Where a read is submitted to the local components of NAC more than 24 hours after the time of the read by a camera it must be deleted 90 days after the time that it was read by that camera.

9.9.7   Mobile ANPR Systems Data Transfer

All ANPR data held on mobile ANPR units that have been unable to transmit their data in real time must be transferred to the NAC within a maximum period of 48 hours from the time of capture except in circumstances where the camera is unable to connect to the local system.

9.9.8   Support and Maintenance

ANPR systems should be commissioned only with an appropriate level of support and maintenance to safeguard against component failure and assist with business change. Local provisions must be in place to ensure that, in the event of any failure of a component of infrastructure that provides communications to the NAC, to prevent loss of data. Reinstatement must be within a period consistent with the ability to retain data locally for that failed component and subject to a maximum period of 96 hours from the time that the component failed.

Roadside infrastructure must be compliant with the requirements of any required permissions and installed to meet safety standards. All components including camera brackets and mountings must be inspected at least annually for signs of corrosion, damage and overall condition to ensure that they remain safe. Records of the inspection for each installation must be kept for 2 years from the date of that inspection.

9.10   System Connectivity

9.10.1   Local ANPR Infrastructure Connectivity to LEA networks

Local ANPR Infrastructure must connect to the LEA network infrastructure to allow user access to the NAC and to support connections to the Police National Computer (PNC) and the national components of the NAC.

The security of all infrastructure connections must be managed via an organisation maintained and managed firewall in accordance with that

organisation's own policy and the Community Code of Connection and NPCC/Police Scotland Community Security Policy.

9.11 National Databases

NAC must have the capacity to check against the following national data sets, as a minimum; PNC; Includes 'Fast Track' 'Extract', 'Schengen' and 'MMC' data.

9.11.1 Response Times

In order to ensure compliance with DPA principles in the circulation of VOI, Real-time matching performance standards must be achieved in 95% of all reads.

The following table summarises maximum response times within the NAC:

System Type	Read to alarm	Number plate read by a camera to delivery to national core NAS	NAC process to delivery at a LEA for visibility by staff
Static ANPR system	4 sec	2 sec	2 sec
Moveable ANPR system	4 sec	2 sec	2 sec
Multi-Lane ANPR System	4 sec	2 sec	2 sec
CCTV Integrated ANPR system	4 sec	2 sec	2 sec
Mobile ANPR system	6 sec	4 sec	2 sec

9.11.2 Real-Time Data Delivery

In order to ensure operational capability and to support compliance with DPA, local LEA ANPR infrastructure must clearly display the current state of connectivity to the NAC and/or any time when data is not being sent to the national components of the NAC. In the event of a communications or systems failure, the LEA infrastructure must buffer that read data and deliver it to the national components of the NAC once the communications or failed systems have been restored. The real-time delivery of data is a priority and the delivery of any buffered data should take place in addition to delivery of real-time data.

9.11.3   Search and Export of Data

The NAC must provide for the identification and export of data to enable identification using criteria defined in TSpec.:

The ability to export ANPR data shall be limited to defined users.

Bulk data, including images, required for investigative purposes that is stored under provisions of the Criminal Procedure and Investigation Act 1996 (CPIA) may be exported to an external LEA defined storage area and managed in accordance with local policy.

The NAC, both at a national and a local level, must provide for user defined privileges for use of data export functions and data may only be exported by users with those privileges.

9.11.4   Security

The NAC must provide for adequate security measures, including access control, to protect against unauthorised access to the system and data held within it. LEAs must ensure compliance with NAC requirements and are accountable for the security of all components of the NAC that are within their control. LEAs must ensure that individual user privileges are consistent with the requirements of their role and individual level of vetting.

Audit trails must be maintained to record all significant actions taken, including:

- User login,

- Successful and failed database searches, and;

- the addition to, and deletion of data from lists of VOI.

There must be provision within the NAC for users to record the reasons and any required authorisation for their actions. Access to audit trails must also be auditable and restricted to users who require this access as part of their role, as defined within policy.

The security of all LEA components of the NAC must be managed via an LEA. The LEA shall maintain and manage a firewall in accordance with the LEA's own policy, the Community Code of Connection and Community Security Policy. The requirements of the national network connections and GSC as confirmed by the appropriate governance authority in each case.

9.12 Databases

9.12.1 National Database

LEAs that receive VOI lists and updates from a national VOI list shall ensure that this list is loaded on their mobile system at the first opportunity following receipt of that list or update.

9.12.2 Third Party Databases

Where data is provided by a third party (e.g. the MIDAS File as provided from the Motor Insurance database), then there must be measures/procedures to ensure that the data is handled consistent with these standards. The criteria that must be addressed through these procedures include:

• Provisions must be in place to ensure that only the most up-to-date data set is in use.

• Version control and file naming systems must be in place

• Distribution methods must be in accordance with GSC security requirements.

9.13 Lists of Vehicles of Interest

9.13.1 Vehicle of Interest List Purpose

Lists of Vehicles of Interest (VOI) may be maintained by LEAs to support intelligence development, operations and investigations. The contents of a list of VOI will depend upon the purpose of that list, the format for which is detailed in TSpec.

9.13.2 Vehicle of Interest List Information and Access Controls

VOI Lists used for monitoring purposes and that do not require an operational response may include the details defined within the Tspec. When a VOI List is used to support operational response, sufficient information to ensure an appropriate response must be included.

LEA may maintain a VOI list for operational response purposes; however, these lists should only be used in circumstances that do not meet the need to include the information on the PNC. Access permissions for those lists must be restricted to ensure that data access is proportionate in each case.

Special Categories of Data and Criminal Convictions Data as defined by Schedule 1 of the DPA and Articles 9.1 and 10 of UKGDPR should only be included within a VOI list when it is essential to the purpose of circulation. The LEA circulating the list must ensure that the content and provisions for the access to any such list are appropriate at all times.

9.13.3 Vehicle of Interest List Resilience

The NAC will make lists of VOI available to LEA in order that they can be loaded onto management servers and mobile systems should the live-link to NAC become unavailable and to support the monitoring of lists within local components of the NAC .

Except as above, LEAs must not load VOI lists received from NAC onto any other systems and must establish procedures to ensure that VOI lists loaded onto the management server or mobile systems are current versions of those lists.

9.13.4 Actions required for a Vehicle of Interest List

Any LEA publishing a list of VOI onto NAC will determine access controls for that list and the extent that it may be made available to other LEAs for access within local components of the NAC. Lists will only be accessible to LEAs where it is proportionate for that accessibility. Where one LEA subscribes to the VOI Lists of another LEA, there is an obligation to monitor the list, assess a 'hit' against the list and respond subject to local resource availability and operational demands.

National data sets will only be accessible to LEAs where it is proportionate for that accessibility taking account of the remit of the LEA and their authority to respond to an alert against that list. Where an LEA subscribes to a national VOI List (E.g PNC fasttrack) there is an obligation to monitor the list, assess a 'hit' against the list and respond subject to local resource availability and operational demands.

Logs of the loading of any VOI list onto a mobile system shall be maintained as required by Section 10.11.2.

9.13.5 Vehicle of Interest List Accuracy

The LEA supplying a VOI list to the NAC must ensure that information within the list is accurate, of current relevance, and is in a format that conforms to the requirements detailed within TSpec. All lists held locally or supplied to the NAC must be reviewed on a regular basis to ensure current accuracy. All lists must be reviewed at least once in each 28 day period by the LEA holding or supplying the list.

9.13.6 Vehicle of Interest List Deletion

An LEA will be advised of the intended deletion of a list provided to the NAC where that list has not been reviewed within a 28 day period. Lists received from an LEA will be deleted from the NAC no later than 56 days after the last date of review unless revised by the LEA that supplied the list within that overall 56 day period.

LEAs must ensure that lists held locally remain accurate and that contents are deleted should they become inaccurate or no longer required for operational purposes.

9.13.7   Vehicle of Interest List Extraction

LEAs will not extract data from a list of VOI from another LEA, for the purposes of creating a composite list from a number of such lists, to be held within local components of the NAC

A national composite list may be established for vehicles in respect of compliance with requirements, for some or all of, national VOI lists for current vehicle insurance, tax, a valid test certificate and record of a current keeper provided that lists are reviewed, updated as appropriate or deleted after a maximum of 24hours after their creation.

9.13.8   Vehicle of Interest Alert Notifications

LEAs may provide for alerts against a VOI list to be provided by mobile communication technology including secure SMS text messages and secure email. An email message may include the details of the read including images and a map of the location. Information received by SMS and text may not be forwarded to other persons and must be deleted within 48hours of receipt.

.

9.14   Performance Evaluation

Performance testing must be consistent with current guidance provided by the Defence Science and Technology Laboratory (DSTL). (DSTL Guidance)

9.14.1   Installation of ANPR Infrastructure

Unless the exceptions for covert systems apply, on installation of any component of ANPR Infrastructure compliance with performance standards detailed within NASPLE must be confirmed and recorded.

Compliance with performance standards is required for both initial installation or on re-installation or re-deployment of any ANPR camera or other component.

9.14.2   Capture Rate Assessment

Any assessment of 'capture' rate must be based on not less than 250 consecutive vehicles (or a minimum period of 2 hours) displaying a VRM visible to the human eye passing within the field of view for a camera and in

the case of a multi-lane system this applies to each lane covered by that system.

9.14.3 READ Rate Assessment

The READ rate for each type of system must be determined for not less than 250 consecutive 'captured' Vehicles displaying a VRM visible to the human eye.

Performance must be assessed for daylight and night time conditions. It is advisable to assess for a range of conditions including; bright daylight (dawn); bright daylight (dusk); overcast daylight and night time.

9.14.4 Performance Evaluation Schedules

The performance of all ANPR systems must be regularly reviewed to ensure conformance with the data standards defined in this document. NAC functionality should be used to monitor continued compliance with required 'capture' rates.

Compliance with the READ rate for a camera should be reviewed at least annually with a sample of not less than 250 consecutive reads. Provisions for performance evaluation must be defined in LEA policy and procedures.

In addition to the annual assessments, the performance standards for all cameras that do not have the capability to provide supporting imagery must be evaluated at no less than 6 monthly intervals. Assessments for this additional assessment shall include a sample of east 50 vehicles passing consecutively within the field of view.

9.14.5 Performance Evaluation of Covert Cameras

Where covert installation of ANPR infrastructure has been authorised within the provisions of RIPA or RIPSA, and the purpose of the installation may be compromised as a result of testing, the testing need not be completed.

9.14.6 Performance Evaluation Logs

A log for all performance evaluation activities must be retained in a form to enable the record of reviews for each component within ANPR systems to be identified and retrieved when required.

10 Part 3: Data Access and Management Standards

10.1 Data Access and Management Standards Overview

Part 3 prescribes the standards required for access to and management of ANPR data within the NAC.

The obligations that arise under the DPA are different depending on the reason for processing of data. It is the responsibility of the controller for the LEA that is processing the data to ensure compliance with relevant parts of the DPA in each case.

10.2 Data Management

10.2.1 Policy

All LEAs that connect to, or have access to, the NAC must have an up to date written policy in place for the access, management and use of ANPR data, including provisions for audit, which must be consistent with Compliance and Audit Standards.

Access to ANPR data must be proportionate to the circumstances of that access and taking account of the impact on the fundamental rights and freedoms of individuals.

10.2.2 Data Access Management

Authorised members of LEAs may access and use data within the NAC to the extent that is compliant with the DPA in the circumstances of each case, without reference to a controller unless otherwise required within the terms of NASPLE.

10.2.3 Shared Collection Equipment

10.2.3.1 Data provision by non-LEAs

The NAC may receive data via an LEA from ANPR systems not directly within the control of the LEA in circumstances where it is using shared collection equipment that is owned and managed by a non-LEA organisation.

In these circumstances, the controller for the LEA that initially receives the data and the organisation owning the collection equipment are both controllers who will store data in separate databases that they manage independently. LEA controllers for data received under any such

31

arrangement may manage the data and allow access to the data without reference to the owner, or any other user of the shared collection equipment.

10.2.3.2 Data received directly into national components of the NAC

The NAC may receive data directly from ANPR systems not within the control of an LEA in circumstances where data is submitted to the NAC using shared collection equipment that is owned and managed by a non-LEA organisation, without the data first being received by a LEA.

The NPCC policing lead for ANPR as controller for data received under any such arrangement may manage the data and allow access to the data without reference to the owner, or any other user, of the shared collection equipment

10.2.3.3 Management of data provided by non-LEAs

In circumstances where a non-LEA has provided data to the national components of the NAC, the NPCC policing lead for ANPR and the organisation owning the collection equipment are both controllers who will store data in separate databases that they manage independently.

The NPCC policing lead for ANPR as controller for data received under any such arrangement may manage the data and allow access to the data without reference to the owner, or any other user, of the shared collection equipment.

10.2.3.4 Compliance Agreement

The LEA that receives data from a non-LEA organisation for submission into NAC, or the NPCC policing lead for ANPR in respect of data submitted directly to the national components of the NAC, must ensure that a formal written-agreement is in place with the owner of the camera and other components of the ANPR infrastructure detailing appropriate arrangements to enable compliance with NASPLE.

10.2.4 Data Extraction from NAC

Where an LEA accesses data within any component of the NAC they are controller for any data extracted from the NAC as a result of that access. Management of all data that is extracted must be in accordance with the provisions within NASPLE and any reports or other documents that include data from NAC must be marked in accordance with the requirements of the Government Security Classifications (GSC). Personal data must only be processed in accordance with the DPA.

10.3 Organisational and User Access to ANPR Data

10.3.1 ANPR Password Policy

Password requirements for access to NAC is based on national Cyber Security Centre (CSC) guidelines and is applicable to all roles within LEA, third party contractors and suppliers and staff responsible for NAC service management.

Staff will be allocated individual accounts that may only be accessed using a password in a format approved by the national Accreditor or alternative CSC format as approved by PDS.

10.3.2 ANPR Account Management

Staff who are approved to access NAC as both a user and for administrative purposes must be allocated separate accounts such that these functions cannot be achieved using a single log in account. Accounts must be reviewed, suspended or terminated in the following circumstances:

• An account must be suspended if it is not accessed for a period of 90 days. The need for access must be reviewed within the subsequent 7 days. The account may then be reactivated or deleted as appropriate,

• Access permissions must be reviewed within 7 days of a person changing role within an LEA.

• An account must be terminated within a maximum of 48 hours of a person leaving an LEA or partner agency.

10.3.3 Provisions for Data access

Any access to data must be for law enforcement purposes relating to national security, counter terrorism, the investigation of criminal offences as defined in Annex B, for operational purposes relevant to individual and public safety. E.g Missing persons. or for the purpose of audit both scheduled and in relation to allegations of misconduct.

Staff within an LEA may be granted access to the extent relevant to their role, in accordance with local LEA policy in an LEA. LEA policy must be consistent with the purposes and standards within this document and the specific requirements at Annex C.

Intelligence and evidential reports may only be provided by authorised staff with appropriate access permissions using functionality within NAC components. The extraction of data by other means such as 'screen shots' from components of the NAC is not permitted.

10.3.4 Vetting Requirements for access to ANPR data

Staff accessing the NAC are required to have successfully completed vetting to the standards as detailed below unless in exceptional circumstances with express written approval of the NPCC Policing lead for ANPR, as lead controller, approves any vetting process as equivalent to the required standard.

10.3.4.1 Police

Staff within a police service LEA authorised to access ANPR data must have successfully completed Recruitment Vetting (RV) to NPCC vetting standards.

10.3.4.2 Non - Police LEA

Staff within an Approved Organisation that is a non-police LEA authorised to access ANPR data must have current vetting clearance to national non-police personnel vetting (NPPV) Level 2.

10.3.4.3 Partner Agencies

Controllers may allow access to non-police staff in partner agency (e.g. local authority controllers) for the law enforcement purposes of the controller, subject to have them having current vetting clearance to NPPV Level 2, to the extent necessary for their role.

10.3.4.4 Police Service Administration, Monitoring and Audit

Police LEA staff conducting activity in respect of administration, monitoring and audit of any components of the NAC will have a current security clearance to SC level and NPPV to Management Vetting standard.

10.3.4.5 Non-Police LEA Administration, Monitoring and Audit

Non-police LEA staff conducting activity in respect of administration; monitoring and audit of any components of the NAC will have a current security clearance to SC level and NPPV Level 3.

10.3.4.6 National Audit

Staff appointed to any National Audit role must have a minimum current security clearance to Developed Vetting (DV) level and NPPV Level 3.

10.3.4.7 National Administration and Processor Companies

Staff within NAC supplier companies or the Home Office that have access to the national components of the NAC for management or administrative

purposes will have a current security clearance to SC level and NPPV Level 3.

10.3.5 Authorisation Requirements for access to NAC Data

Where an authorisation for access is required, staff providing that authorisation must ensure that access is proportionate in each case taking account of the DPA and associated principles and that access is in the interest of justice.

10.3.5.1 Authorisation of Staff Access

Each LEA will designate a senior manager who is accountable for the authorisation of staff who may access ANPR data.

10.3.5.2 Role Based Access and Training

Personnel will only be granted access to ANPR data to an extent that is necessary and proportionate to their role. LEAs must ensure that authorised staffs have completed any required training and are fully aware of the provisions within NASPLE. Authorised staff will have individual access accounts and permissions.

10.3.5.3 Records of Authorised Staff

LEAs will maintain a list of authorised staff and ensure that a persons' authorisation is revised or cancelled as appropriate when they change role or leave the organisation.

10.4 Disclosure and Evidential Use of Data

Data held within or obtained from the NAC may not be used or disclosed for any purposes except those as authorised within NASPLE.

10.4.1 Disclosure schedules

Where ANPR data obtained is retained as material within the meaning of the CPIA (or similar procedures in Scotland), in preparation of disclosure schedules, information relating to ANPR methodology, tactics and camera locations will be recorded on the Schedule of Sensitive Material and may be disclosed to prosecution authorities.

10.4.2 Restrictions on personnel in disclosure of ANPR and in production of evidential materials

Statements of evidence in respect of data within the NAC may only be provided by staff authorised within LEAs to provide ANPR evidence with current access permissions within NAC for that purpose. Subject to the

following authorised staff may provide a statement of evidence for any data held within the NAC.

10.4.3   Provisions to safeguard the location of ANPR infrastructure

The order to safeguard the national ANPR infrastructure, apart from data obtained from a Mobile ANPR system, the precise location for an ANPR read obtained from a camera will not be disclosed during an investigation, nor included in evidence unless the controller with responsibility for the camera that recorded the data has been consulted and provided written consent for that disclosure or for evidence to be provided. The following principles apply:

10.4.3.1 Evidential Use of Data

Evidence of an ANPR read will only be included where it is of specific relevance to an investigation and is of material value to any judicial proceedings.

10.4.3.2 Disclosing of Camera Locations in Evidence

Apart from data obtained from a Mobile ANPR system the disclosure of the precise location of the camera that recorded an ANPR read, by the production of a map, or otherwise, is not permitted during any stage of an investigative or prosecution process, unless specifically authorised by the data controller for the LEA with responsibility for the camera that recorded that data.

10.4.3.3 Information to be included in evidential disclosure

The location of a read will be described in the following decreasing order of preference;

1.   The general area of the location (e.g. Town, District, Metropolitan Borough)

2.   The postcode (following consultation with the controller with responsibility for the camera that recorded the data, in circumstances where this will identify the precise location of the camera)

3.   The name of the road (following consultation with the controller with responsibility for the camera that recorded the data, in circumstances where this will identify the precise location of the camera)

4.   The precise location (following consultation with the controller with responsibility for the camera that recorded the data)

10.4.3.4 Disclosure of ANPR data for non-evidential purposes

Unless permitted within section 9.6 of this document, core ANPR read data and any supporting imagery as defined by section 7.4.5., is not to be transferred to other systems, nor disclosed to any third party, including staff from an organisation that is not listed at Annex A, Data may only be disclosed to the data subject in accordance with procedures for dealing with FOI and DPA enquiries in accordance with section 9.12. Data may be shared with an organisation that is not listed at Annex A with the express written authority of the controller with responsibility for the camera that recorded that data.

10.4.3.5 Disclosure to non-Approved Organisations

Where an LEA has an active role in collaboration with another LEA which is not listed at Annex A in the conduct of an investigation, and circumstances consistent with the provisions of Schedule 2 DPA apply, the results of a search of ANPR data may be disclosed to that other LEA with a requirement that it is not further disclosed without the express written authority of the controller for the 'Approved Organisation' collaborating in the investigation.

10.4.3.6 Controller Representations re Disclosure of Camera Locations

In addition to the above, the controller that owns or controls the camera that captures 'read' data will be provided with a specific opportunity to make representation to any court that is to consider an order for information to be disclosed regarding the location of a camera.

10.4.3.7 Recording of Disclosure

In all circumstances where data is disclosed a record must be maintained to include the identity of those disclosing and receiving the data and the reason for and any authorisation of that disclosure.

10.5 Dissemination of Data Otherwise than for Evidential Purposes

Data may be disseminated by authorised staff for investigation and intelligence purposes consistent with Law Enforcement processing of data. Dissemination must follow the College of Policing Authorised Professional Practice (APP) for Intelligence Management using the National Intelligence Report (NIR) format.

10.6 Retention and Deletion

10.6.1 Record Retention and Deletion

ANPR READ records in national components of the NAC must be deleted 12 months[3] after their initial capture, unless retained under provisions of CPIA or similar provisions in Scotland. Retained data may only be accessed in connection with the investigation subject to that retention after a period of 12 months following initial capture.

ANPR READ records in local components of the NAC must be deleted 90 days after their initial capture, unless retained under provisions of CPIA or similar provisions in Scotland.

Records may also be retained external to the NAC following a review that identifies a continuing policing purpose for those items of data under provisions of MOPI. These records must be retained and managed in accordance with those provisions. LEAs must establish procedures for the management and review of any data held under these provisions including arrangements for deletion as required.

Data held within a national cache supporting approved transfer to any other systems must be deleted within 7 days of entering the cache.

10.7 Storage of ANPR Data otherwise than in NAC

Data must not be stored outside the NAC unless for the purpose of retention in accordance with section 10.6.1 or in accordance with section 10.9 below where those requirements cannot be met within the NAC, or it has been extracted as a result of a court order or other lawful authority for the provision of the data.

10.8 Record Amendment

Records that are identified as incorrect for any reason must either be corrected or deleted at the time that they are found to be incorrect.

10.9 Record Deletion from Third Party Systems

ANPR data must be deleted from any computer-based system within 7 days of entry of that data, where an LEA has established any link between the NAC and any other computer-based system for the purposes of:

---

[3] Read metadata is deleted on day 366 after initial capture. Associated images are deleted the following day. Data may only be accessed up to 12 months after initial capture (Annex C) unless in circumstances of 9.5.1 above.

- Monitoring and the initiation of an operational response to any hit against a list of vehicles of interest or

- More advanced research and analysis purposes in relation to an investigation.

- Entries are included in command and control records

An exception exists for deletion after 7 days when a review has been conducted of the data that it is proposed to be retained which has identified the items of data where a continued policing purpose remains that can only be satisfied by the continued processing of the data within the system external to the NAC.

In this case provisions of MOPI (or similar provisions in Scotland) apply and the relevant items of data may be retained and managed in accordance with those provisions; or

An exception also exists for deletion after 7 days when a review has been conducted into the data that it is proposed to be retained which has confirmed that the items of data are relevant to an investigation. In this case the relevant items of data may be retained, managed and deleted in accordance with the requirements of CPIA.

10.10   Transfer to local systems for basic user access

Data may not be transferred to any local systems external to the NAC to facilitate basic user access to ANPR data.

10.11   Records of Data Processing, Access and Disclosure

10.11.1   NAC Logging

A log of all automated processing operations will be maintained within NAC to include records of access by administrators and authorised users, data capture, alterations and any search of data or records within NAC. Logs of administrator or user access must include details of the identity of the user together with the justification, date and time of that access and a record of any authorisation relevant to that access.

10.11.2   Mobile Systems Logging

A log recording the details of all lists of VOI that have been loaded onto mobile systems as authorised by section 9.13.4 will be maintained by the LEA that loaded the log onto the mobile systems.

10.11.3　Logging of Access on systems external to NAC

In addition, LEAs are required to maintain a record of any access by their staff to ANPR data, in any external system, to include records of access by administrators and authorised users, data capture, alterations and any search of data or records within the NAC. Logs of administrator or user access must include details of the identity of the user together with the justification, date and time of that access and a record of any authorisation relevant to that access in a readily retrievable form.

10.11.4　Logging of Escalation of Investigation Category

LEAs are required to maintain a record of any escalation of an investigation to the category 'Major Investigation' or 'Serious Investigation', including details of the reason for escalation, in a readily retrievable form.

10.11.5　Logging of data Disclosures

Unless disclosure is in accordance with the provisions of the CPIA or similar provisions in Scotland, LEAs will maintain records of all disclosure of ANPR data including the justification, data and time of the disclosure, the identity of the person disclosing the data and the identity of the recipient of the data.

10.11.6　Use of Logs in Disciplinary Proceedings

Logs within NAC and those recorded by an LEA may be used for the purposes of self-monitoring by the controller or the processor, the conduct of internal disciplinary proceedings, in ensuring the integrity and security of personal data and for the purposes of criminal proceedings.

10.11.7　Disclosure of Logs to ICO and Home Office

Records within NAC and any local records must be made available to the Information Commissioner, and the Home Office on request for audit and monitoring purposes.

10.12　Management and Audit of NAC

Audit must be conducted in accordance with National Standards for Compliance and Audit of Law Enforcement ANPR by staff with appropriate security clearance.

LEAs will support all controllers for NAC in the audit and management of the NAC.

LEAs will support the national auditor in the monitoring and audit of access to the NAC and will provide relevant information on request.

LEAs will audit the access to NAC by their staff in accordance with Audit Standards and maintain a record of all audits that are undertaken. Details of such audits will be made available to the Information Commissioner, the Surveillance Camera Commissioner and the national auditors on request.

10.13   Freedom of Information Act and Data Protection Act Enquiries

All requests for Information regarding the NAC made to a public authority under the provisions of the Freedom of Information Act 2000 (FOI) will be referred to the relevant controller for consideration and will be managed according to the JCA.

All requests in relation to data held on NAC, made under provision of the DPA, will be referred to the controller for consideration and will be managed according to the JCA. This includes any subject access requests and requests for erasure or restriction on processing.

Annex A: Approved Organisations

List of Approved Organisations
Avon and Somerset Constabulary
Bedfordshire Police
Border Force
British Transport Police
Cambridgeshire Constabulary
Cheshire Constabulary
City of London Police
Civil Nuclear Constabulary
Cleveland Police
Cumbria Constabulary
Department for Work and Pensions (DWP)
Derbyshire Constabulary
Devon and Cornwall Constabulary
Dorset Police
Driver and Vehicle Licensing Agency (DVLA)
Driver and Vehicle Standards Agency (DVSA)
Durham Constabulary
Dyfed-Powys Police
Environment Agency
Essex Police
Food Standards Agency
Food Standards Scotland
Gangmasters and Labour Abuse Authority
Gloucestershire Constabulary
Greater Manchester Police
Gwent Police
Hampshire Constabulary
Hertfordshire Constabulary
H M Revenue & Customs (HMRC)
Humberside Police
Immigration Enforcement
Intelligence Services

Isle of Man Constabulary (IOM)
Kent Police
Lancashire Constabulary
Leicestershire Constabulary
Lincolnshire Police
Medicines and Healthcare Products Regulatory Agency (MHRA)
Merseyside Police
Metropolitan Police Service
Ministry of Defence Police
National Crime Agency (NCA)
NAFN Data and Intelligence Services facilitating Local Authority Trading Standards investigations
National Vehicle Crime Intelligence Service (NaVCIS)
Norfolk Constabulary
North Wales Police
North Yorkshire Police
Northamptonshire Police
Northumbria Police
Nottinghamshire Police
Police Service of Scotland
Police Service of Northern Ireland (PSNI)
Royal Air Force Police
Royal Military Police
Royal Navy Police
Scottish Environment Protection Agency
Serious Fraud Office (SFO)
South Wales Police
South Yorkshire Police
Staffordshire Police
Suffolk Constabulary
Surrey Police
Sussex Police
Thames Valley Police
The Pensions Regulator
Thurrock National Investigation Service
Warwickshire Police
West Mercia Constabulary

West Midlands Police
West Yorkshire Police
Wiltshire Police

Annex B: Investigation Categories

Investigations within LEAs fall within three main categories, so that there is a consistency of understanding within LEAs as to which investigations should be included within each category. The main categories are:

- Major Investigations

- Serious Investigations

- Priority and Volume Investigations

A consideration of the category of the investigation informs effective management and decision making, including the scope for an investigation and determination of the resources that are to be deployed. These categories provide the framework to support a national policy for retention of, and access to ANPR data. The categorisation of an investigation should be determined taking account of the circumstances in each case, using the below framework as a guide.

Major Investigations

A key characteristic is that Major Investigations should normally be led by a Nationally Registered Senior Investigating Officer (SIO) within a police force or similarly senior investigator in non-police LEAs.

Designated Major Investigations

Major Investigation Types
Murder
Attempted Murder
Manslaughter
Infanticide
Child Destruction
Kidnapping

Terrorist related crimes

Serious Investigations

Designated Serious Investigations

Serious Investigation Types
Arson
Abduction
Aggravated Burglary dwelling and non-dwelling
Arson High Value or life endangered
Blackmail
Drug Trafficking
Death by Dangerous Driving
Female Genital Mutilation
Fraud and Associated Offences (80hrs + investigation time)
Gross Indecency Child
Offences under S1 Firearms Act
Offences involving indecent images of children
Offences under Modern Slavery Act
Perverting Justice
Public order (racially motivated)
Rape
Robbery (Firearms or ABH or more serious injury caused)

| Sexual Assault (children under 13) |
| Threats to Kill |
| Vulnerable Missing Person |
| Wounding (S18/20) |
| Response to incidents of significant public interest / public safety/ public security |

Serious Investigation Escalation

Serious Investigations may, with the authority of a senior manager[4] be escalated to the category of Major Investigations.

Investigations that have been escalated to serious from the category of Priority and Volume Investigations may not be further escalated to the category of major Investigation.

Any authority to escalate to the higher category together with the reasons for the grant of that authority must be recorded. Any authority to escalate will take account of the following factors:

Serious Investigation Escalation Factors

Consideration	Examples
Community factors	- Likely to escalate into large scale disorder or critical incident - Has escalated from a previous offence - Sensitivity regarding individuals involved

---

[4] an officer of at least superintendent rank in the police or the equivalent level of seniority in a non-police organisation

Offence characteristics	• Aggravating factors of the offence
	• Vulnerability of victims/witnesses,
	• Has crossed force or national boundaries
	• Forms a previously undetected series
Offender Characteristics	• Organised crime
	• Terrorism links
	• Resistance to police operational strategies
	• Multiple offenders

Priority and Volume Investigations

Investigations not included within the above categories will be considered as within the remit of Priority and Volume Investigations. This will include investigations into street robbery, burglary and vehicle-related criminality and non-crime issues such as anti-social behaviour, vehicle excise enforcement, road traffic offences, safeguarding and missing persons.

Priority and Volume Investigations may with the authority of manager[5], be escalated to the category of Serious Investigations.

Any authority to escalate to the higher category together with the reasons for the grant of that authority must be recorded and will take account of the following factors:

---

[5] an officer of at least Inspector rank in the police or the equivalent level of seniority in a non-police organisation

Priority and Volume Investigations Escalation Factors

Consideration	Examples
Community	• **High risk of critical incident** • **Sensitivity regarding individuals involved**
Offence Characteristics	• Aggravating factors of the offence such as: • Hate crime • Weapons used • Injuries sustained • Vulnerability of victims/witnesses, • Priority issue identified within NIM business process. • Series of offences e.g. forensic links to the offender(s) • Complexity of the Investigation
Offender Characteristics	• Criminal history • Resistance to investigative strategies • Prolific offender • Multiple offenders

Annex C: Data Access Requirements

Age of data to be accessed (as required)	Purpose of access to data
	To monitor alarms or receive reports from matches against a list of Vehicles of Interest (VOI) from a NRD for operational response or intelligence purposes.
Real or near real time during the course of monitoring	By any member of staff authorised to access ANPR systems with no additional authority required.
	To research data for 'Priority and Volume Investigation' purposes.
Up to 90 days	By any member of staff in accordance with their authorisation to access ANPR systems.
Over 90 days	By any member of staff in accordance with their authorisation to access ANPR systems with written authority of an Inspector or equivalent staff grade; a) where there has been a significant delay in reporting the offence to be investigated, or; b) new information or evidence has become available, or; c) the investigation is being conducted diligently and expeditiously and is not yet completed.

	To research data for 'Serious Investigation' purposes.
Up to 1 year	By any member of staff in accordance with their authorisation to access ANPR systems.
	To research data for 'National Security', 'Counter Terrorism' or other 'Major Investigation' purposes.
Up to 1 year	By any member of staff in accordance with their authorisation to access ANPR systems.
	To prepare evidential material for information revealed during a previous search of ANPR data.
	By any member of staff in accordance with their authorisation to access ANPR systems with no additional authority required.
	To comply with a written request from the Crown Prosecution Service, the procurator fiscal or on the direction of a court.
	By any member of staff in accordance with their authorisation to access ANPR systems with no additional authority required.
	To research data as part of an investigation into alleged breach of the policing Code of Ethics or similar LEA professional standards purposes.
	By any member of staff in accordance with their authorisation to access ANPR systems with written authority of a superintendent or equivalent staff grade.