

# **Staffordshire Police**

## **ANPR**

### **Privacy Impact Assessment Checklist**

#### **ANPR Project**

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**Author:**

**D PLATT**

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Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project

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**Contents**

**1. INTRODUCTION..... 3**

**2. PRIVACY IMPACT ASSESSMENT (PIA) ..... 3**

    2.1 STEP 1 - CHECKLIST CRITERIA FOR FULL-SCALE PIA ..... 3

    2.2 STEP 2 - CHECKLIST CRITERIA FOR SMALL-SCALE PIA..... 6

    2.3 STEP 3 - CHECKLIST CRITERIA FOR PRIVACY LAW COMPLIANCE CHECK..... 9

    2.4 STEP 4 - CHECKLIST CRITERIA FOR DATA PROTECTION ACT COMPLIANCE CHECK..... 10

**3. SIGN-OFF ..... 10**

**Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project**

**1. Introduction**

This document presents the Privacy Impact Assessment Checklist for the Digital Interview Recording Project.

.....some words about scope/background of what DIR is.....

**2. Privacy Impact Assessment (PIA)**

**2.1 Step 1 - Checklist Criteria for Full-Scale PIA**

The answers to these questions will determine the scale of PIA needed (Full, Small or None), and whether a Privacy Law and/or Data Protection Act compliance check is also required.

| No   | Step 1 - Criteria for Full-Scale PIA Checklist   | Yes | No |
|--|--|-----|----|
| <b>Technology</b>  |  |     |    |
| 1  | Does the project apply new or additional information technologies that have substantial potential for privacy intrusion?   |     | X  |
| Justification for response:<br><br>ANPR is already imbedded in Staffordshire police. It does not apply new or additional information technologies that would change the level of privacy intrusion.  |  |     |    |
| <b>Identity</b>  |  |     |    |
| 2  | Does the project involve new identifiers, re-use of existing identifiers, or intrusive identification, identity authentication or identity management processes?   |     | X  |
| Justification for response:<br><br>ANPR does not include new or re use of existing identifiers. The system is in place to read vehicle registration marks. It does not directly identify a individual or invade their privacy. This would only happen if further checks were carried out on other police systems at which point the necessary authorities are in place and would be applied for. |  |     |    |
| 3  | Might the project have the effect of denying anonymity and pseudonymity, or converting transactions that could previously be conducted anonymously or pseudonymously into identified transactions?                                   |     | X  |
| Justification for response:<br><br>This does not reveal an individuals identity or any activity/transactions they are or have been involved in.  |  |     |    |
| <b>Multiple Organisations</b>  |  |     |    |
| 4  | Does the project involve multiple organisations, whether they are government agencies (e.g. in 'joined-up government' initiatives) or private sector organisations (e.g. as outsourced service providers or as 'business partners')? |     | X  |
| Justification for response:<br><br>The project does involve other organisations (Local Authority/Prison) however the management of data and retention is owned by the police. The data will come straight  |  |     |    |

**Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project**

| No   | Step 1 - Criteria for Full-Scale PIA Checklist   | Yes | No |
|--|--|-----|----|
|  | back to the police back office and will not be shared live. Post event search requests can be submitted formally so that there is an audit and authorisation process just like any other search for ANPR data. |     |    |
| <b>Data</b>  |  |     |    |
| 5  | Does the project involve new or significantly changed handling of personal data that is of particular concern to individuals?  |     | X  |
| Justification for response:<br><br>The ANPR project will see more data collected by the installation of more ANPR cameras however this does not involve new or significantly changed handling of such data. The data retained does not match that as described under the data protection act. The data retained will be a vehicle registration mark, the time/location it passed one of the cameras in the Staffordshire area and a photograph of the vehicle which may or may not include an image of the driver or passengers.   |  |     |    |
| 6  | Does the project involve new or significantly changed handling of a considerable amount of personal data about each individual in the database?  |     | X  |
| Justification for response:<br><br>The ANPR project will see more data collected by the installation of more ANPR cameras however this does not involve new or significantly changed handling of such data. The data retained does not match that as described under the data protection act. The data retained will be a vehicle registration mark and the time/location it passed one of the cameras in the Staffordshire area. Although it may provide a platform to later identify an individual from a photograph taken of the vehicle when it passed the camera that can only be achieved through the use of other methods of identification already imbedded within the police service. |  |     |    |
| 7  | Does the project involve new or significantly changed handling of personal data about a large number of individuals?   |     | X  |
| Justification for response:<br><br>The ANPR project will see more data collected by the installation of more ANPR cameras however this does not involve new or significantly changed handling of such data. The data retained does not match that as described under the data protection act. The data retained will be a vehicle registration mark and the time/location it passed one of the cameras in the Staffordshire area. Although it may provide a platform to later identify an individual from a photograph taken of the vehicle when it passed the camera that can only be achieved through the use of other methods of identification already imbedded within the police service. |  |     |    |
| 8  | Does the project involve new or significantly changed consolidation, inter-linking, cross-referencing or matching of personal data from multiple sources?  |     | X  |
| Justification for response:<br><br>The ANPR project does not involve anything new or significantly changed here. The system has already been in place for a long period of time. The amount of data recorded and retained will increase through the use of more ANPR cameras however this will not be  |  |     |    |

**Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project**

| No   | Step 1 - Criteria for Full-Scale PIA Checklist   | Yes | No |
|--|--|-----|----|
| interlinked or cross reference in a different manner than that is already available.   |  |     |    |
| Exemptions and Exceptions  |  |     |    |
| 9  | Does the project relate to data processing which is in any way exempt from legislative privacy protections?  | X   |    |
| Justification for response:<br>This is for law enforcement purposes to prevent and detect crime. The police can lawfully process and retain data for law enforcement purposes.   |  |     |    |
| 10   | Does the project's justification include significant contributions to public security measures?  |     | X  |
| Justification for response:<br><br>ANPRs justification does include contribution to public safety measures purely due to the site selection of cameras in relation to regional and local intelligence as well as counter terrorism. The contribution cannot be called significant however as this only provides data which much be acted on by staff resources.  |  |     |    |
| 11   | Does the project involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation? |     | X  |
| Justification for response:<br>The project does involve other organisations (Local Authority/Prison) however the management of data and retention is owned by the police. The data will come straight back to the police back office and will not be shared 'live'. Post event search requests can be submitted formally so that there is a data trail audit and authorisation process just like any other search for ANPR data. |  |     |    |

The answers to questions 1 – 11 need to be considered as a whole to determine whether a full-scale PIA is warranted, and if so, whether the scope of the PIA should be wide-ranging or focused on a particular aspect of the project.

| Full-Scale PIA required?  | Yes | No |
|---|-----|----|
|   |     | X  |
| Justification:<br><br>The ANPR project is an extension of the current system with only amendments to internal data capture size and policy being brought in line with NPIA national guidance. |     |    |

If a full-scale PIA is not required, proceed to [Step 2 - Criteria for Small-Scale PIA](#), otherwise:

|   |
|---|
| If a full-scale PIA is required, what should be its scope?<br><br>N/A |
|---|

Proceed to [Step 3 - Criteria for Privacy Law Compliance Check](#)

**Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project**

## 2.2 Step 2 - Checklist Criteria for Small-Scale PIA

| No   | Step 2 - Criteria for Small-Scale PIA                                     | Yes | No |
|--|---|-----|----|
| <b>Technology</b>  |   |     |    |
| 12   | Does the project involve new or inherently privacy-invasive technologies? |     | X  |
| <p>Justification for response:</p> <p>Some system research around the movements of vehicles may require certain authorisation under RIPA however there are procedures in place to deal with such detailed checks. The system does log traffic movements by recording registration marks and a digital photograph of the vehicle which is uploaded to a Back Office Facility (BOF – data storage). Further checks are needed on this system and other systems before any privacy intrusion and it is prior to this that the necessary authorities would be obtained.</p> <p>The system itself prior to these further checks is not inherently intrusive.</p> <p>ANPR is something that the public are aware of through media coverage and police related traffic programmes (Traffic Cops and Interceptors regularly mention and explain what ANPR is and how it works)</p> |   |     |    |
| <b>Justification</b>   |   |     |    |
| 13   | Is the justification for the new data-handling unclear or unpublished?    |     | X  |
| <p>Justification for response:</p> <p>Staffordshire Police are meeting an existing national standard by responding to alerts on a 24/7 basis.</p> <p>An ANPR policy document has been written and will be made available to the public which gives the explanation of the system and the reason behind the camera location choices. It does not disclose the camera locations as per NPIA guidance.</p> <p>A freedom of information report has also been produced by the information assurance team which pre empts the types of requests that would be received. (This data has come from NPIA and other forces). A clear decision has been made on what will be disclosed and what will not along with the justification for both.</p>   |   |     |    |
| <b>Identity</b>  |   |     |    |
| 14   | Does the project involve an additional use of an existing identifier?     |     | X  |
| <p>Justification for response:</p> <p>This is not a new identifier and in any case ANPR does not identify the driver or passengers of a vehicle. Checks would have to be carried out on other police systems for a policing purpose i.e. Police National Computer and Intelligence.</p>  |   |     |    |
| 15   | Does the project involve use of a new identifier for multiple purposes?   |     | X  |
| <p>Justification for response:</p> <p>ANPR does not identify the driver or passengers of a vehicle. Checks would have to be carried out on other police systems for a policing purpose i.e. Police National Computer and Intelligence.</p>   |   |     |    |

**Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project**

| No   | Step 2 - Criteria for Small-Scale PIA   | Yes | No |
|--|---|-----|----|
| 16   | Does the project involve new or substantially changed identity authentication requirements that may be intrusive or onerous?                    |     | X  |
| Justification for response:<br><br>ANPR has no identity authentication requirements.   |   |     |    |
| <b>Data</b>  |   |     |    |
| 17   | Will the project result in the handling of a significant amount of new data about each person, or significant change in existing data-holdings? |     | X  |
| Justification for response:<br><br>ANPR only involves additional data that is not new or significant.  |   |     |    |
| 18   | Will the project result in the handling of new data about a significant number of people, or a significant change in the population coverage?   |     | X  |
| Justification for response:<br><br>ANPR data is about vehicles not people. Further checks on other police systems would be required to identify a person.<br><br>ANPR records vehicle details not details of individuals. Individuals are only identified through research on other systems with appropriate authorities.<br><br>The actual data capture is unchanged however it is the volume of data that will increase. |   |     |    |
| 19   | Does the project involve new linkage of personal data with data in other collections, or significant change in data linkages?                   |     | X  |
| Justification for response:<br>ANPR is a standalone system. Data is only interlinked by intervention of personnel for a lawful policing purpose.<br><br>ANPR data will still be used alongside other systems the actual use it will not be changed.  |   |     |    |
| <b>Data Handling</b>   |   |     |    |
| 20   | Does the project involve new or changed data collection policies or practices that may be unclear or intrusive?                                 |     | X  |
| Justification for response:<br><br>A policy and procedure document has been written for the ANPR project within Staffordshire Police. Clear and non intrusive data collection policies are contained within those documents as per NPIA guidance.  |   |     |    |
| 21   | Does the project involve new or changed data quality assurance processes and standards that may be unclear or unsatisfactory?                   |     | X  |
| Justification for response:<br><br>As with all other data retained by Staffordshire Police and nationally MOPI guidelines are adhered to which are satisfactory and already imbedded.  |   |     |    |

**Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project**

| No   | Step 2 - Criteria for Small-Scale PIA  | Yes | No |
|--|--|-----|----|
| 22   | Does the project involve new or changed data security arrangements that may be unclear or unsatisfactory?  |     | X  |
| Justification for response:<br>Data security arrangements remain unchanged. Only the quantity of data has changed by increasing. Data security has in fact improved by the new written policy and procedure that has been put in place as well as the required system auditing checks. |  |     |    |
| 23   | Does the project involve new or changed data access or disclosure arrangements that may be unclear or permissive?  |     | X  |
| Justification for response:<br><br>Data access will be unchanged and disclosure arrangements are in place and improved as per NPIA guidelines, ANPR policy and procedure as well as the Freedom of Information document.   |  |     |    |
| 24   | Does the project involve new or changed data retention arrangements that may be unclear or extensive?  |     | X  |
| Justification for response:<br><br>Data retention will not change. Weed dates are already in place as per NPIA guidelines and defined in the ANPR procedure document.  |  |     |    |
| 25   | Does the project involve changing the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before? |     | X  |
| Justification for response:<br>The methods of disclosure will not change and the data will not be readily accessible.  |  |     |    |
| <b>Exemptions</b>  |  |     |    |
| 26   | Will the project give rise to new or changed data-handling that is in any way exempt from legislative privacy protections?   |     | X  |
| Justification for response:<br>ANPR systems are already in place and imbedded in the organisation. The data handling is unchanged.<br>The usual exemption remains under law enforcement prevent and detect crime.  |  |     |    |

Where the answers to questions 12 - 26 are "Yes", consideration should be given to the extent of the privacy impact and the resulting project risk. The greater the significance, the more likely that a small-scale PIA is warranted.

If only one or two aspects give rise to privacy concerns, a small-scale PIA may still be justified. In these circumstances the PIA process should be designed to focus on the areas of concern. If, on the other hand, multiple questions are answered "Yes", a more comprehensive assessment is appropriate.

|   |     |    |
|---|-----|----|
| Small-Scale PIA required?   | Yes | No |
|   |     | X  |
| Justification:<br><br>ANPR systems are already imbedded. The numbers of cameras will increase and therefore the |     |    |

**Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project**

amount of data recorded will also increase. New policy and procedure documents are now in place which have improved data handling and processes.

If a small-scale PIA is not required proceed to Step 3 - Criteria for Privacy Law Compliance Check, otherwise:

If a small-scale PIA is required, what should be its scope?

Proceed to Step 3 - Criteria for Privacy Law Compliance Check

### 2.3 Step 3 - Checklist Criteria for Privacy Law Compliance Check

Note: This step is required where there has been new or change legislation has required either a new process or a change to process to be implemented. Where this is not the case then proceed to step 4.

The answers to these questions will determine whether a privacy law compliance check will be required.

| No   | Step 3 - Criteria For Privacy Law Compliance Check  | Yes | No |
|--|---|-----|----|
| 27   | Does the project involve any activities (including any data handling), that are subject to privacy or related provisions of any statute or other forms of regulation, other than the Data Protection Act? | X   |    |
| Justification for response:<br>RIPA ACT<br>HUMAN RIGHTS ACT  |   |     |    |
| 28   | Does the project involve any activities (including any data handling) that are subject to common law constraints relevant to privacy?   |     | X  |
| Justification for response:<br>There is no confidentiality clause. No information is given in confidence. Only vehicle registration marks are captured. There may be occasions whereby the ANPR image shows the persons present in the vehicle however this system does not identify therefore further checks on other systems with appropriate authorities would be required.<br><br>Intrusion would be governed by the relevant model (Government Information Assurance Maturity Model). |   |     |    |
| 29   | Does the project involve any activities (including any data handling) that are subject to less formal good practice requirements relevant to privacy?   |     | X  |
| Justification for response:<br>RIPA authorities would be required for privacy invasion and the relevant pathways to achieve such authorities are already imbedded within the organisation.   |   |     |    |

**Staffordshire Police, Technology Services  
Privacy Impact Assessment Checklist  
Digital Interview Recording Project**

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If any of the questions 27 – 29 are answered “Yes”, then a privacy law compliance check should be integrated into the project schedule.

Proceed to [Step 4 - Criteria for Data Protection Compliance Check](#)

**2.4 Step 4 - Checklist Criteria for Data Protection Act Compliance Check**

The answers to these questions will determine whether a Data Protection compliance check will be required.

| No  | Step 4 - Criteria for Data Protection Act Compliance Check  | Yes | No |
|---|---|-----|----|
| 30  | Does the project involve the handling of any data that is <u>personal data</u> , as that term is used in the <u>Data Protection Act</u> ? | X   |    |
| Justification for response:<br>Vehicle registration marks are classed as an identifier. |   |     |    |

If question 30 is answered “Yes”, then a Data Protection compliance check should be integrated into the project schedule.

**3. Sign-off**

**PIA Screening Process completed by:**

Name: .....Signature: ..... Date:.....

**Reviewed by:**

Name: .....Signature: ..... Date:.....

Name: .....Signature: ..... Date:.....