



THE CHIEF CONSTABLE OF CLEVELAND

Automatic Number Plate Recognition (ANPR)

Final internal audit report 10.20/21

22 February 2021

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1. EXECUTIVE SUMMARY

With the use of secure portals for the transfer of information, and through electronic communication means, remote working has meant that we have been able to complete our audit / assignment and provide you with the assurances you require. It is these exceptional circumstances which mean that 100 per cent of our audit has been conducted remotely. Based on the information provided by you, we have been able to sample test the control framework.

Why we completed this audit

A review of the Automatic Number Plate Recognition (ANPR) system was undertaken as part of the agreed annual internal audit plan for 2020/21 in respect of the Chief Constable of Cleveland. The use of ANPR allows the Force to gather data and information that may be used to help support operations as well as providing evidence for court cases.

The use of ANPR by police and law enforcement is governed by the National ANPR Standards for Policing and Law Enforcement (NASPLE). NASPLE is a set of guidelines published by the Home Office which outline the standards for which ANPR should be used for policing and law enforcement purposes within the National ANPR Service (NAS) framework. All UK law enforcement and police forces that are part of NAS must comply with NASPLE.

The intention of NAS is to have one single system of ANPR capability across the UK (referred to as the National ANPR Capability, NAC), supported by the National ANPR Infrastructure (NAI). The NASPLE requirements were introduced two years ago to support this, but full implementation of NAC and the NAI has been repeatedly delayed. The most recent estimate of full implementation is April 2021 but it is expected that it will go beyond that date. In consequence, local police forces such as Cleveland have adopted and are working towards the NASPLE standard for the management of ANPR cameras, but not all requirements are yet fully operational. As Cleveland Police's ANPR system is not yet fully integrated into the NAS infrastructure and it is referred to as a 'local' ANPR system. In practice this means that the Force is following NASPLE insofar as it is relevant and is working towards the remainder. This audit was completed to allow Cleveland Police to take assurance that they are complying with NASPLE in preparation for the roll out of the National ANPR Service when it does 'go live'.

Conclusion

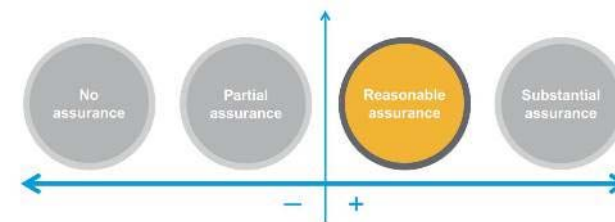
We have found that there is a foundation in place for compliance with NASPLE with some areas being in line with the National Standards (such as procedures relating to the deletion of data and performance checks on camera operation).

However, there are a number of areas where the Force is not yet compliant with the relevant sections of NASPLE, most notably in relation to the creation of strategic assessments prior to deployment of ANPR systems, a policy to inform staff of NASPLE requirements and documenting and retaining evidence of initial checks of camera performance upon deployment.

As a result of our review, we have agreed **three medium priority** management actions and **four low** priority actions. Details of these actions can be found in section two of this report.

Internal audit opinion:

Taking account of the issues identified, the Chief Constable of Cleveland can take **reasonable assurance** that the controls in place to manage this area are suitably designed and consistently applied. However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing this area.



Key findings

Our audit identified the following exceptions with the Force's control framework resulting in three medium priority actions:



The NASPLE set out the requirements for the use of ANPR cameras and the national ANPR infrastructure. Whilst the national ANPR infrastructure is not yet fully in place, Cleveland Police have adopted and are working towards the NASPLE standard for the management of its ANPR cameras. However, there is no formal policy in place to help relevant staff members understand their role and help ensure that they comply with all sections of NASPLE. **(Medium)**



We found that a strategic assessment has not been filled out and completed for six out of the eight ANPR camera deployments currently in place and reviewed, and those that had been completed were not to the standard required by NASPLE. If a strategic assessment for a camera deployment is either not completed or not completed to the required standard, a risk could emerge that Cleveland Police deploy cameras in areas that may not require them or may be disproportionate, resulting in reputational damage. **(Medium)**



We found that the initial checks on camera performance upon deployment are not always conducted to the standard required by NASPLE (250 vehicles / two hours), although this is often due to low vehicle volumes at the deployment site. Whilst further checks are conducted on cameras which have been in situ for longer than two or three months, this process is not in line with NASPLE. We also found that evidence for these checks has not been retained. Failing to complete the initial checks would mean Cleveland Police are not complying with NASPLE and there is a risk that the required documents are not available when an audit is conducted. **(Medium)**

Our audit also identified that the following controls are suitably designed, consistently applied and are operating effectively:



Records are retained for the appropriate periods as set out by the National Police Chiefs' Council (NPCC) guidelines and the Information Commissioner's Office. Through checking reports, we can confirm that data is deleted 12 months after initial capture and any retained data (which is used for court cases) is kept for six years. The deletion of records is completed automatically after a 12-month period and the retained data is deleted after six years manually by the ANPR Co-ordinator after checking to make sure it is appropriate to do so. This is all in line with NASPLE and the guidance from the NPCC.



Access to data is appropriately restricted and reasons for access are recorded. There are multiple levels of access for ANPR data and all levels use appropriate approval methods (such as approval by the ANPR Co-ordinator for basic access and the Director of Intelligence for more advanced access) and forms (account request forms) to ensure only relevant staff have access. Furthermore, suspension of inactive users after 90 days allows Cleveland Police to ensure that only current staff have access to the ANPR system.

2. DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

Area: ANPR				
Control 1	Partially missing control NASPLE are issued by the Home Office. Version 2.1 was issued in November 2020. These set out the requirements with which the police and other Law Enforcement Agencies (LEA) must comply to access the NAC.	Assessment:		
		Design		x
		Compliance		-
Findings / Implications	<p>The NASPLE set out the requirements for the use of ANPR cameras and the national ANPR infrastructure. Whilst the national ANPR infrastructure is not yet fully in place, Cleveland Police have adopted and are working towards the NASPLE standard for the management of its ANPR cameras.</p> <p>However, there is no formal policy in place to help relevant staff members understand their role and ensure that they comply with all sections of NASPLE. Whilst the Force can refer to NASPLE as and when required, a policy document would enable the translation of NASPLE standards into practical instructions that are clearer for all staff to follow.</p> <p>Not having a formal policy in place to assist staff to follow the requirements of NASPLE could give rise to the risk of staff failing to comply with the requirements of NASPLE.</p>			
Management Action 1	A policy will be written and implemented to ensure that the requirements of NASPLE are addressed and tis will be communicated to all relevant staff.	Responsible Owner:	Date:	Priority:
		ANPR Co-ordinator	31 March 2021	Medium

Area: ANPR

Control 2	Section 8.5.1 of NASPLE sets out the requirement for a strategic assessment to be conducted before any deployment to ensure there is a need for ANPR.	Assessment:		
		Design	✓	
		Compliance	×	
Findings / Implications	Upon discussion with the ANPR Co-ordinator, we found that a strategic assessment has not been filled out in advance of ANPR camera deployments. Instead, a Request for Support document is used. We reviewed the Request for Support document completed for the eight ANPR camera deployments currently in place and found that six of these documents completed were not to the standard required by NASPLE.			
	We recognise that a new, more detailed document is currently being drafted for future ANPR deployments and the ANPR Co-ordinator has said that this should be completed in early 2021. This new document will address the areas from NASPLE that are missing on the current Request for Support document.			
	However, if a strategic assessment for a camera deployment is not completed, a risk could emerge that Cleveland Police deploy cameras in areas that may not require them or may be disproportionate given the circumstances.			
Management Action 2	A strategic assessment will be completed for all ANPR camera deployments to ensure that the placement of an ANPR camera is appropriate and, given the circumstances of the threat/problem, proportionate.	Responsible Owner: ANPR Co-ordinator	Date: 31 March 2021	Priority: Medium

Area: Purchases and Credit Cards				
Control 3	Section 8.5.2 of NASPLE sets out the requirement for a Data Protection Impact Assessment (DPIA) to be conducted before any deployment.	Assessment:		
	A DPIA is completed to ensure compliance with NASPLE and reduce any risks such as failing to consider the impact of privacy for a deployment which could lead to complaints by local residents or negative publicity.	Design		✓
		Compliance		×
Findings / Implications	Cleveland Police conducts a force-wide DPIA annually which includes ANPR cameras that have been in stationed in their current position for more than twelve months.			
	Cameras that are temporary and/or moveable (Moveable ANPR Systems) do not need a DPIA if they are deployed for under 12 months. This was confirmed by the ANPR Co-ordinator and was documented in a report on the deployment of temporary ANPR cameras by the National Camera Strategy Working Group in November 2020.			
	However, where a moveable camera is initially installed temporarily but exceeds 12 months in the same location, a DPIA will have to be completed. For the sample selected, only one of the cameras (RD12 (install 2)) fell into the category of exceeding 12 months in the same location, although we have been told by the ANPR Co-ordinator that this camera will be included in the annual DPIA exercise which is due to be completed January 2021, rather than at the anniversary date (in this instance the anniversary date was December, and therefore will breach the 12 month requirement).			
	Failure to conduct a DPIA in line with the required timeframes could give rise to complaints by local residents or negative publicity.			
Management Action 3	A process will be introduced to ensure that when a camera has been in place for 12 months, a DPIA will be completed on the anniversary date (12 months) of its deployment.	Responsible Owner: ANPR Co-ordinator	Date: 31 March 2021	Priority: Low

Area: ANPR

Control 4	<p>Section 8.5.1 of NASPLE states that, where a need is identified, consideration must be given as to whether the deployment 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.</p> <p>Consideration of the legitimate expectations of individual privacy is also required.</p>	<p>Assessment:</p> <p>Design ✓</p> <p>Compliance ×</p>
Findings / Implications	<p>Cleveland Police currently use a Request for Support document which documents the request for deployment of an ANPR camera and is authorised by the ANPR team. We reviewed a sample of eight camera deployments and six of the eight Request for Support documents did not have sufficient detail (in areas such as value for law enforcement and justification for camera deployment) to comply with the relevant NASPLE Section.</p> <p>A new, more detailed document is currently being drafted for future ANPR deployments and the ANPR Co-ordinator has said that this should be completed in early 2021. This new document will address the areas from NASPLE that are missing on the current Request for Support document.</p> <p>A completed, detailed Request for Support document will reduce the risk that Cleveland Police does not address all areas of NASPLE as well as the risk that camera deployments are not seen as value for money.</p>	
Management Action 4	<p>The ANPR Co-ordinator will ensure that the revised Request for Support document currently being drafted, is completed and implemented.</p> <p>This new draft will contain sections on justification, rationale, assessment of value for law enforcement and outcome.</p>	<p>Responsible Owner: ANPR Co-ordinator</p> <p>Date: 31 March 2021</p> <p>Priority: Low</p>

Area: ANPR

Control 5	Partially missing control	Assessment:		
	Section 9.5.1 of NASPLE states that all LEAs that connect to, or have access to, the NAS must have an up to date written policy in place for the access, management and use of ANPR data.	Design		×
	The Force has an Information Management Policy and an Information Security Policy which specifies the minimum measures required to protect the confidentiality, integrity and availability of police information assets.	Compliance		-
Findings / Implications	Cleveland Police have both an Information Management Policy and an Information Security Policy.			
	The Information Management Policy is a general, force-wide policy which was approved in April 2019 and last reviewed in August 2020. This policy does not specifically address data from ANPR cameras but rather general data/information that is used, collected or stored by Cleveland Police. ANPR data would therefore fall into this category.			
	The Information Security Policy is another general, force-wide policy and was approved in March 2019. It was last reviewed in January 2020. This policy considers the confidentiality and security of any data related to Cleveland Police. The Management Policy and the Security Policy do not explicitly address ANPR data; however, all ANPR data must comply with both policies as it is data produced and stored by Cleveland Police.			
	In addition, whilst most of the requirements of NASPLE are covered by these policies, there are areas which are missing, for example:			
	<ul style="list-style-type: none">There is no information in either policy regarding the removal of accounts after a certain period of inactivity (section 9.3.2 of NASPLE: ANPR Account Management relates to the suspension of inactive accounts).A provision for audit was also not included within either Policy.			
	If the Information Management and Security Policies fail to cover all areas of NASPLE, Cleveland Police risk staff not complying with the National Standards, particularly on important areas such as data security.			
Management Action 5	The Information Management Policy and the Information Security Policy will be revised to ensure that Cleveland Police are complying with the National Standards and then reissued.	Responsible Owner:	Date:	Priority:
	In the event a separate ANPR Policy is implemented these two policies will still need to reflect the ANPR requirements of NASPLE.	ANPR Co-ordinator	31 March 2021	Low

Area: ANPR				
Control 6	<p>Section 8.7 of NASPLE outlines the requirement for each force to ensure that ANPR cameras adhere to the appropriate performance standard both initially and throughout use.</p> <p>Section 8.14.1 of NASPLE states that, with the exception of covert systems, the performance of ANPR cameras must be checked and the results documented on installation or re-deployment. Section 8.14.2 of NASPLE states that this test must cover at least 250 vehicles (or a minimum period of two hours). The camera is required to capture 98% of all vehicle registration marks (VRM) that are visible and accurately read 95% of captured VRM.</p>	Assessment:		
		Design		✓
		Compliance		×
Findings / Implications	<p>The ANPR Co-ordinator advised us that when first setting an ANPR camera up, initial checks are completed by the Technical Services Unit (TSU). This normally consists of checking approximately 50 vehicles to make sure the camera has correctly identified them. Whilst this is not strictly in line with NASPLE, we were informed that this is only occurs with the cameras that are intended to be in place for no longer than two to three months and is quite often because of low traffic volumes at the deployment site.</p> <p>For cameras that are intended to be in place longer than two to three months, the ANPR Co-ordinator schedules an appropriate date (as close to the two to three month anniversary as possible) to perform a further check of 250 vehicles (or a minimum period of two hours) to ensure that the camera is working correctly.</p> <p>This process is not written in any policy or guidance and neither is it in line with NASPLE. Upon discussion with the ANPR Co-ordinator, we also found that evidence for these checks had not been retained; however, the ANPR Co-ordinator has informed us that the camera would not have been left to capture data unless it had completed the initial test with the TSU team.</p> <p>We were supplied with an example performance test and were satisfied that this had been conducted correctly. However, failing to complete the initial checks would mean Cleveland Police are not complying with NASPLE and the risk that the required documents are not available when an audit is conducted. Conducting a performance check will help ensure that the camera is functioning correctly and performing to the standard that is required as well as reducing the risk that incorrect data is being collected.</p>			
Management Action 6	The installation and testing process will be revised to ensure that checks are performed in line with NASPLE, evidence of initial checks completed by the TSU team and any subsequent checks are documented and held on file for a period of two years.	Responsible Owner: ANPR Co-ordinator	Date: 31 March 2021	Priority: Medium

Area: ANPR

Control 7	Missing control The National Standards for Compliance and Audit of Law Enforcement (ANPR) issued by the Home Office (Version 2.0 issued September 2020) outline the requirements for all ANPR systems: <ul style="list-style-type: none">• To be audited, both internally and externally.• Records to be kept of those audits / checks.	Assessment: Design × Compliance -
Findings / Implications	The National Standards for Compliance and Audit of Law Enforcement (ANPR) issued by the Home Office (Version 2.0 issued September 2020) outline the requirements for all ANPR systems to be audited, both internally and externally, with specified tests to be conducted and the frequencies of those tests. To date, Cleveland Police have not been audited as required by these standards. This is because the National ANPR system is currently not being used (and has not officially 'gone live'). Despite this, the ANPR Co-ordinator has identified a person to perform the role of Auditor and a plan has been created to address these audit requirements. A completed audit provides validation that Cleveland Police are adhering to NASPLE and ensures that any non-compliance is made clear. Failing to complete the required audits at their specified frequencies could increase the risk that non-compliance goes un-noticed.	
Management Action 7	An audit plan will be developed alongside the introduction of the Auditor to ensure that all auditable areas are addressed and the procedure for auditing is documented. The audit plan will be implemented, and an audit conducted, every six months to ensure that Cleveland Police are compliant with all areas of the standards.	Responsible Owner: ANPR Co-ordinator Date: 31 March 2021 Priority: Low

APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Priority	Definition
Low	There is scope for enhancing control or improving efficiency and quality.
Medium	Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.
High	Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*		Non Compliance with controls*		Agreed management actions		
					Low	Medium	High
ANPR	3	(9)	4	(9)	4	3	0
Total					4	3	0

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The scope was planned to provide assurance on the controls and mitigations in place relating to the following area:

Objectives of the area under review

The National ANPR Standards for Policing (NASP) guidance detail the standards that are required to be met for the development and use of ANPR systems. Our review will confirm the re-deployment of ANPR systems is consistent with NASP guidance and key accountability and responsibilities have been established.

Our review will consider the following areas in relation to the infrastructure for the re-deployment of ANPR systems:

- There is a policy / procedure in place that provides a framework for the management, deployment and use of ANPR and it reflects the national standards.
- A strategic assessment has been undertaken to identify strategic threats necessitating ANPR deployment at a specific location to detect, deter and disrupt criminality.
- Privacy impact assessments are conducted for all assets to ensure the rights of individual privacy are considered and balanced against the need to protect the public from harm.
- There is a policy in place detailing the requirements for data management and access control including provisions for audit.
- Records are retained for the appropriate periods as set out by NPCC guidelines and the Information Commissioner's office. The deletion of records is appropriately approved.
- Access to data is appropriately restricted and reasons for access are recorded.
- Compliance with performance standards detailed with the NASP guidance are undertaken for the re-deployment of any ANPR device.
- The re-deployment of ANPR devices is appropriate, considered and approved.
- Appropriate governance arrangements are in place to consider the performance and re-deployment of ANPR devices.

Limitations to the scope of the audit assignment:

- Our review will only focus on the re-deployment of ANPR devices. We will not consider any other ANPR projects.
- We will not review the procurement of ANPR devices or if value for money has been achieved.
- Testing will be completed on a sample basis so we will not confirm all ANPR infrastructures have been undertaken in accordance with National ANPR Standards for Policing (NASP).
- We will not verify the calibration of equipment for accuracy.
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

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The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

Our report is prepared solely for the confidential use of **The Chief Constable of Cleveland**, and solely for the purposes set out herein. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights from RSM Risk Assurance Services LLP for any purpose or in any context. Any third party which obtains access to this report or a copy and chooses to rely on it (or any part of it) will do so at its own risk. To the fullest extent permitted by law, RSM Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

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We have no responsibility to update this report for events and circumstances occurring after the date of this report.

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