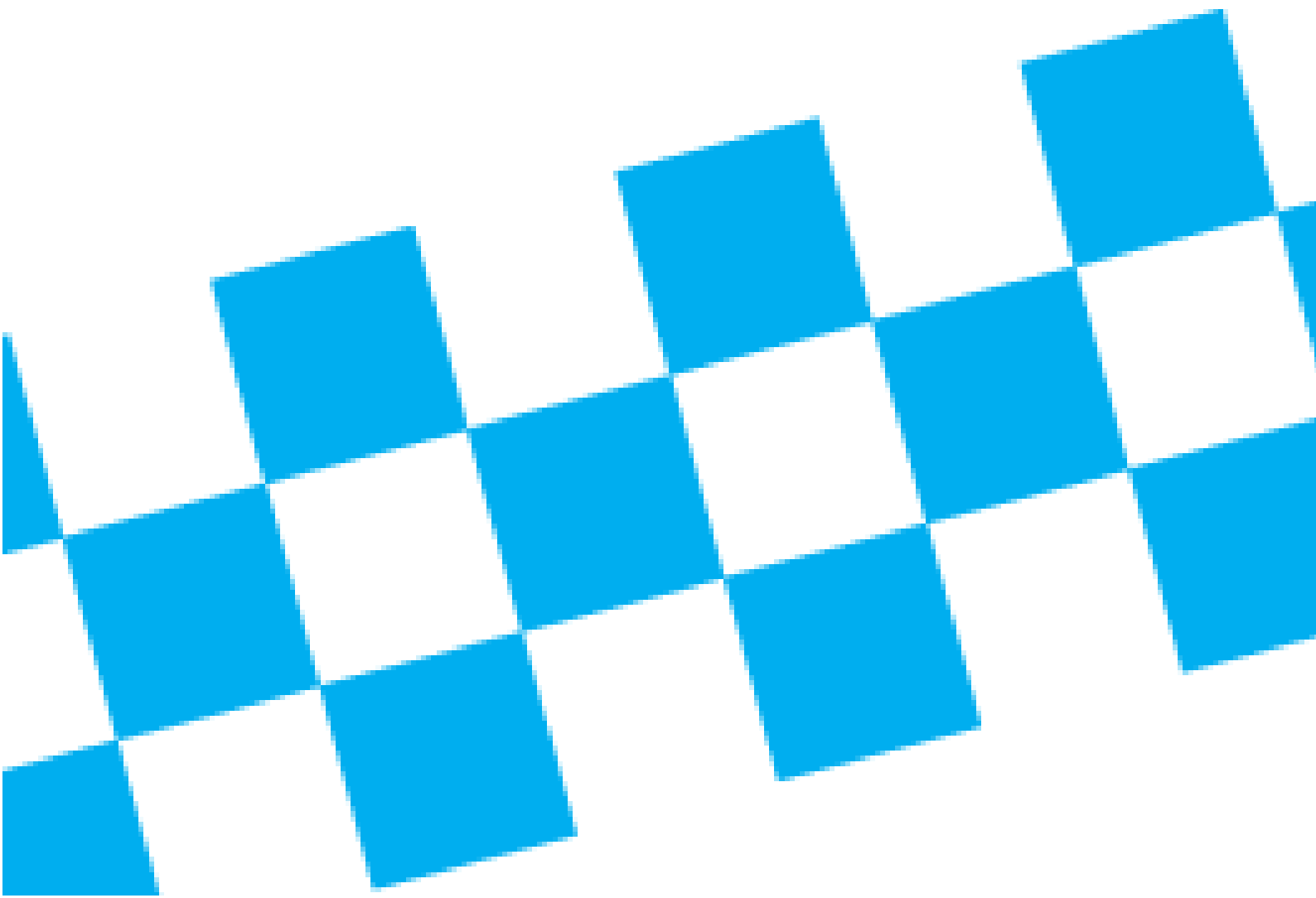# GLAINTELLIGENCE

Automatic Number Plate Recognition consultation report

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Contents

Introduction

This document summarises the context, methodology and findings from an eight week period of communications and consultation around the Mayor's proposal to give the Met Police access to Transport for London's (TfL) Automatic Number Plate Recognition cameras.

The results from this report will form a significant part of the Mayoral decision-making process and will inform the wider Privacy Impact Assessment which will be presented to the Mayor for his consideration.

1. The headlines

In total we received 2,315 responses to our online consultation survey, while we undertook representative surveying with over 6,000 Londoners, 1,000 through a telephone survey and two samples of 1,000 and then a further 4,000 through online surveys.

1.1 Support for the policy
- Across all polling 8 in 10 respondents support the Mayor's policy to give the Met police access to TfL's ANPR cameras. Around half of all respondents thought the Met Police already had full access to TfL's camera data. In fact very few thought that the police didn't already have full or partial access to TfL's ANPR data (3% in September 2013 and 4% in February 2014).

1.2 Sharing information and working together
- 8 in 10 Londoners support the sharing of data between public organisations to improve efficiency and the use of technology by the Met Police to improve their service.
- 83% of respondents agreed that the Mayor should ensure that public organisations such as TfL and the Met Police work together and share information to make them more effective and save money.

1.3 Keeping data safe and trust
- 8 in 10 Londoners think that there must be strict rules in place to protect privacy and stop the Met Police misusing personal data collected by road cameras.
- 61% of poll respondents were confident that the Met Police already uses technologies like road cameras responsibly, while 12% were not.
- Self-selecting consultation respondents were slightly less confident with 49% agreeing and 36% disagreeing that the Met Police could be trusted to keep road camera data safe and use it properly.

1.4 Benefits
- Respondents do see value in this policy helping the police do their job, solving crime, catching more criminals and deterring criminal activity.
- The improved safety was also seen in the context of improving the efficiency of the Met Police by ensuring they were well-equipped with technology and so could save resources such as time and money.

1.5 Criticism of the policy
- Respondents raised concerns around the level of surveillance in the capital, with particular reference to how proper use and security of the data would be ensured.
- Some respondents went further than concern about general security of the data and questioned trust in the Met Police, particularly in light of other times, highlighted in the media, where data has been mislaid, misappropriated or misused, and the potential for 'creep' of different uses for this data.

2. Background and context

2.1 What are Automatic Number Plate Recognition (ANPR) cameras?

ANPR cameras take a digital reading of vehicle number plates as they pass a camera. These can be stored on a database and be used to identify when vehicles have been in an area. They can be sited in fixed locations or used in vehicles.

2.2 Keeping London safe using ANPR technology:

The Mayor and the Met Police want to ensure London is the safest big city in the world. One of the ways to do this is to use the best available technology to help cut crime and bring offenders to justice. Automatic Number Plate Recognition (ANPR) is one of these technologies.

The Met Police already use ANPR data to help keep London safe. They use it to investigate and solve crimes, and to stop vehicles that have been linked to crime. However, the Met Police's ANPR camera coverage in London is patchy. Better coverage would make London safer.

Transport for London (TfL) own a significant ANPR estate (approximately 1,300 cameras), used to enforce the Congestion Charge Zone (CCZ) and Low Emission Zone (LEZ), which could also be used to solve and prevent crime.

2.3 The Mayor's proposal

In the 'Harnessing Technology' section of his 2012 crime manifesto the Mayor proposed that the Met Police would be given access to TfL's ANPR cameras. This triples the level of coverage the Met Police have access to. Specifically he stated:

"I will ensure Automatic Number Plate Recognition (ANPR) is used across all London to help identify and track down the vehicles of criminals, which has proved of particular use against burglars.

Ensuring strong protections against misuse, I will extend this approach by requiring Transport for London (TfL) and the Metropolitan Police Service to assume joint responsibility for TfL's ANPR camera system which is used for the operation of the Congestion Charge and the Low Emission Zone. This would give the Met straightforward access, with an explicit purpose for crime prevention and detection."

The Mayor also went on to state that measures would be taken to ensure road users' civil liberties were safeguarded:

"In order to safeguard our civil liberties, this will be accompanied by a public awareness campaign to ensure the processing of personal data is fair and lawful; and measures to guard against the possibility of it becoming part of a 'surveillance state'."

2.4 The rationale

Over the 12 months up to this consultation the Met Police have been testing their use of this camera data to ensure it is an effective crime solving method. There is now robust evidence that giving the Met Police access to TfL's cameras would help prevent crime and improve detection rates. Public support has also been measured on a number of occasions, and shows strong support in favour.

The rationale around giving the police access revolves around three central tenets:

- **helping the police make London even safer** by allowing the Met Police to detect more crime, act more swiftly and build stronger cases against criminals
- **stopping criminals using London's roads** by making it more likely criminals will be detected and or stopped
- **saving money** as it is estimated that it would cost the Met Police almost £32 million to build the equivalent ANPR camera coverage. They will also save time and resources finding criminals or collecting camera footage from third parties.

2.5 Protecting privacy

It was recognised that steps would be required alongside this proposal to protect Londoners against a surveillance state. As such it was specifically stated that the use of ANPR data will be strictly to protect the capital from crime. All personal data derived from the ANPR data will be managed in accordance with the Data Protection Act (DPA), with strict guidelines followed by the Met Police.

In order to ensure the proposals were in line with public expectations and to identify any issues that might be encountered or need addressing before the policy was implemented, the Mayor also proposed to undertake a communications and consultation exercise to inform the work. This consultation will also form an essential part of the Privacy Impact Assessment for the proposals, which works specifically to identify and address any issues around privacy resulting from the work.

3. Method and approach

The period of communication and consultation ran for a period of eight weeks, from 11 February to 8 April 2014 and comprised two core areas of work. First, the communications elements to ensure Londoners were aware of the proposal and given the opportunity to influence it, and second, the consultation element to actually give Londoners the opportunity to put forward their views.

The proposal was outlined to the Information Commissioner's Office to obtain feedback and ensure the planned consultation and communications activity will adequately support a democratic decision around using personal data.

The basic proposal worked on an invitation to 'have your say/share your views/tell us what you think' about the proposal, with participation available on and off line.

3.1 Communications

3.1.1 Overview
We directly contacted 562,000 Londoners over an eight week period in order to raise awareness of the Mayor's proposal and to seek their views. This hit a large percentage of the 1.3 million Londoners who drive and are therefore directly affected by this proposal, while further communications including press release, social media and printed leaflets broadened this out to higher numbers and offered other, accessible options. The main consultation page received over 16,600 hits itself over this time period.

The objectives behind the marketing element of this project focussed around two areas, as follows:

Awareness
- To communicate and raise awareness of the benefits of ANPR camera sharing between TfL and the Met Police.
- To communicate the Mayor and MOPAC's commitment to prevent and reduce crime, and increase confidence in policing, through ANPR camera sharing between TfL and the Met Police.

Behaviour
- To achieve the broadest possible reach of the target audience using the budget and resource available to encourage as many on and offline consultation responses as possible.

3.1.2 Target audiences
The primary audience was car owners in London (circa 1.3 million households) as these are the people most directly affected by the existence of these cameras, it being their personal data they collect.

Secondary though are all Londoners, other car owners, people who may drive in the future and so be affected and people who are all, to a lesser or greater extent, affected by crime and threats to public safety.

Communications therefore needed to focus on London's drivers, but also allow others with an interest to share their views too. All this, as always, needed to be done with a balance between the interests of democratic decision-making and pressure on public resources.

The Mayor's Office for Policing And Crime (MOPAC) pages of London.gov (along with a feature on the homepage) were used as the platform which the communications work, in the main, drove people towards. During the eight week period, this page had 16,689 visits, with an average dwell time of 4 minutes 42 seconds.

3.1.3 Design and approach
The design used was one that would work across multiple platforms to ensure consistency and a strong brand throughout the consultation period.

The materials used were chosen due to their consistency with other MOPAC campaign work and therefore the strong identity they were likely to offer to Londoners. They were based on:

- Existing MOPAC advertising work (chequerboard, blue and white)
- Following on from MOPAC Roadshows advertising/creative work (Jan-Mar 2014)
- To aid recognition of MOPAC priorities and to help build MOPAC recognition

Two-pronged approach to drive on and offline participation:

Offline
- Leaflets aimed at consumer groups with limited or no internet access and at drivers on a tactical level (e.g. at petrol stations, garages).
- Leaflet gave link to e-survey (talk.london.gov.uk/road-cameras) but also a telephone number so a hard copy survey could be sent to member of public.

Online
- Survey managed by GLA Intelligence, public calls managed by PLU and Freepost address confirmed by Post Room.
- Digital activity (London.gov, social media, emails) directed people to an e-survey.

Bought media
92,000 leaflets distributed, as follows:

- 87,000 via targeted networks to community centres such as libraries and driver destinations such as garages and petrol stations.
- 4,200 distributed via the Met Police at community events.
- 800 distributed at City Hall.

GLA owned channels (free of charge)
- Content on London.gov.uk under 'Policing & Crime'.
- Homepage feature on London.gov.uk.
- @MOPACLdn tweets - 1,362 followers.
- GLA intranet event listing.
- London@work editorial & lift panel posters.
- Press release on London.gov.uk.

Earned media
- TfL email to database of 562,000 individuals registered to receive messages on Congestion Charging, LEZ or other driving topics.
- Earned activity via social media / partners (free of charge).
- Social media coverage.
- Met Police activity e.g. stakeholder groups and network activity.

3.2 Consultation

3.2.1 Method and approach
The consultation plan ran alongside the communications and marketing package already outlined over the period 11 February to 8 April 2014. Additional public opinion data was sought outside and during this period through representative means including telephone and online polling, in order to ensure that all groups' views were represented throughout.

The following methods of garnering public opinion were undertaken:

- In June 2013 a question was included on a GLA telephone poll with a representative sample of 1,000 adult Londoners.
- In September 2013 a suite of questions were asked on an online GLA poll of a representative sample of 1,000 adult Londoners.
- In February 2014 a suite of questions were asked on an online GLA poll of a representative sample of 4,000 adult Londoners.
- From 11 February to 8 April 2014 an online survey with closed-ended and open-ended questions were asked to allow the general public to air their views. Hard copy versions of the survey were also available on request.

3.3 Telephone poll, June 2013

3.3.1 Methodology
The GLA's Opinion Research and Statistics (ORS) team carry out telephone polls every quarter to gauge the views of Londoners. ICM Research on behalf of the GLA conducts a minimum 1,000 telephone interviews per poll.

In our June 2013 telephone poll we put a single question to the public as to whether they supported or opposed the Mayor's proposal for sharing TfL's ANPR cameras with the Met Police. The poll ran from the 14 to 17 June and 1,000 telephone interviews were conducted with a representative sample of Londoners over 18 years old.

Results are weighted by gender, age, social class, tenure, working status, ethnicity and area of London lived in to ensure data is representative. Where results do not sum to 100%, this may be due to multiple responses, computer rounding or the exclusion of don't knows/not stated. All demographic differences referred to are statistically significant at a 95% confidence level.

3.3.2 Findings
In June 2013 the majority of Londoners who were asked the question, agreed that police should have access to number plate data, already collected by TfL cameras, for crime solving purposes. Half were definitely in favour, with just over a further quarter (28%) answering probably. Just over one in ten (12%) were definitely against such a proposal.

Question: TfL have around 1,300 cameras on major roads, collecting number plate data which is currently used for identifying vehicles to receive congestion and low emission zone charges. In an effort to crack down on crime and track known offenders the police would like to be able to use this data too.

Do you think the police should or should not be given access to data collected by these cameras?
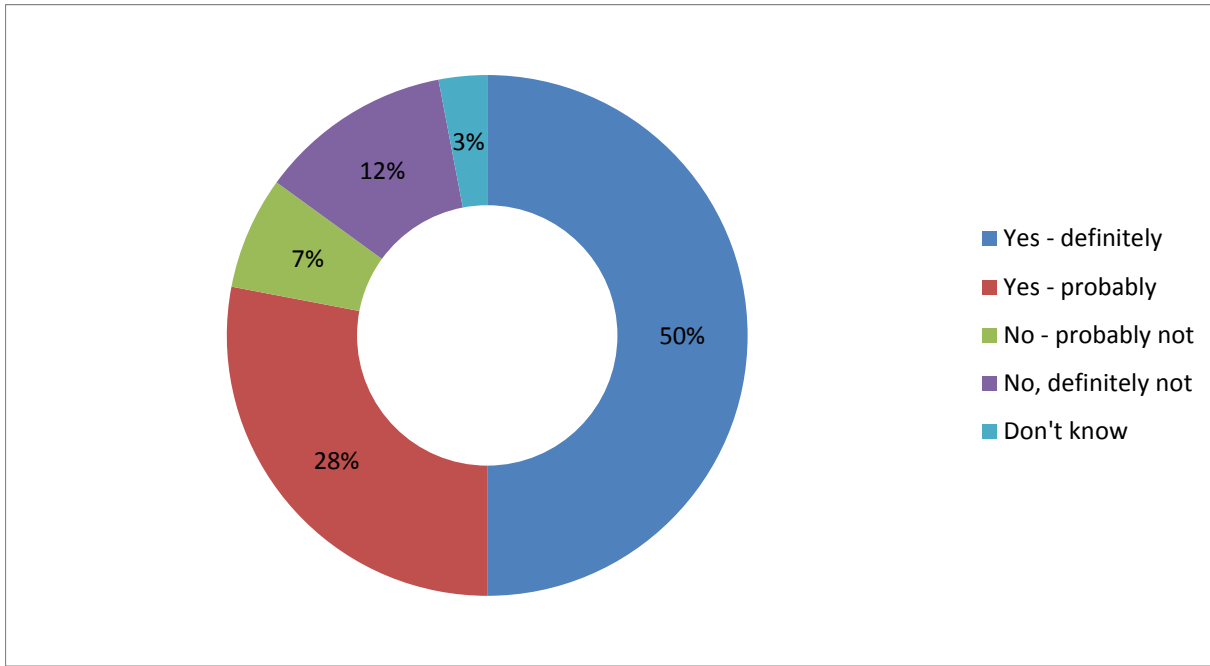
There were few differences across demographic groups, though men are less likely to agree (22% against compared with 15% of women) as are those aged 45-54 (25% against, compared with 17% for all other age groups). This finding may reflect their greater likelihood to drive and therefore expectation of being affected – the 2010 National Travel Survey shows 43% of men and 30% of women to be the main driver.

Women, those not working, or working part-time are more likely to be in favour of such a proposal, again perhaps in part due to a lower likelihood of being drivers.

3.4 Online polls – September 2013 and February 2014

3.4.1 Methodology
TfL run a regular online poll with a representative sample of 1,000 Londoners to gauge the views of Londoners. This is delivered by TNS Research, on behalf of TfL. TfL, as part of the GLA Group, allows the GLA to buy space on these polls.

In September the GLA bought space on a survey of 1,031 Londoners, and in February on a number of online surveys to give a coverage of 4,223 Londoners in order to cover a number of issues relating to ANPR and the Met Police's sharing of knowledge and use of private data. These interviews were conducted with adult Londoners of 16 years or older.

Results are weighted by gender, age, social class, tenure, working status, ethnicity and area of London lived in to ensure data is representative. Where results do not sum to 100%, this may be

due to multiple responses, computer rounding or the exclusion of don't knows/not stated. All demographic differences referred to are statistically significant at a 95% confidence level.

3.4.2 Findings

3.4.2.1 Support for the policy proposal
Public support for the proposal to share TfL's ANPR cameras with the Met has been consistently high across online polls, as well as the telephone poll response detailed earlier. In online polls in September 2013 and February 2014 over eight in 10 Londoners (81% and 83% respectively) supported the proposal, while about one in 10 were in opposition (10% and 9% respectively).

Do you think the police should or should not have access to data collected by these cameras to help them tackle crime?
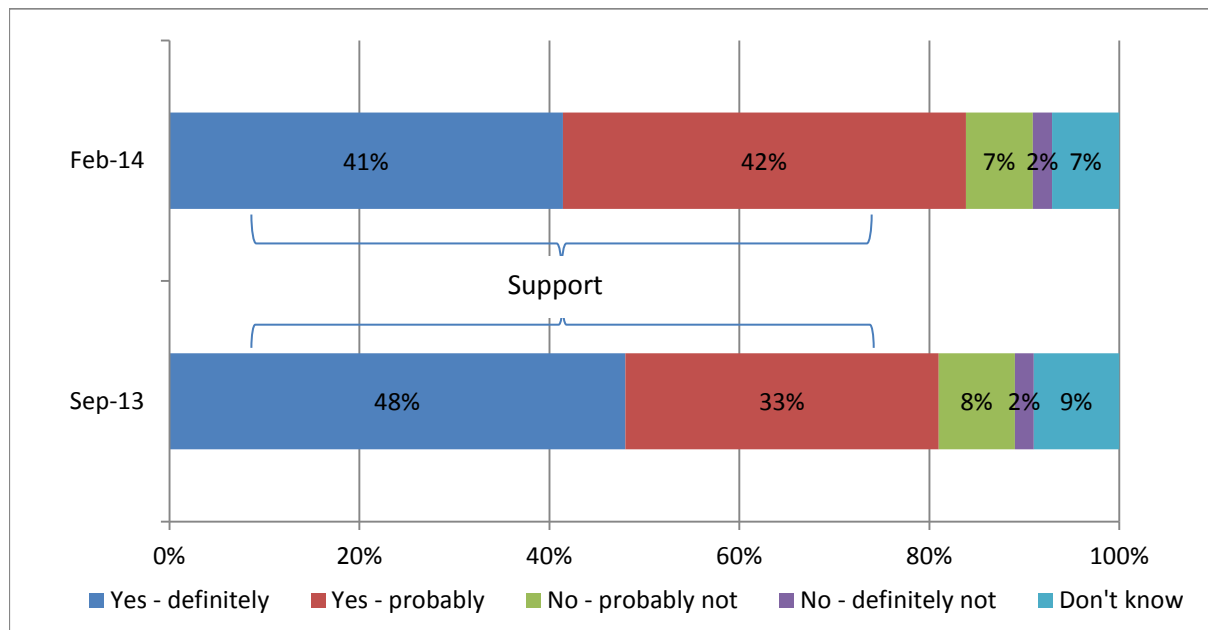
Confidence in the Met's use of modern technology was a key factor here. 93% of those that were confident that the Met use modern technologies like road cameras responsibly and within the law were in support of the proposal, while only 63% of those that weren't confident supported the proposal.
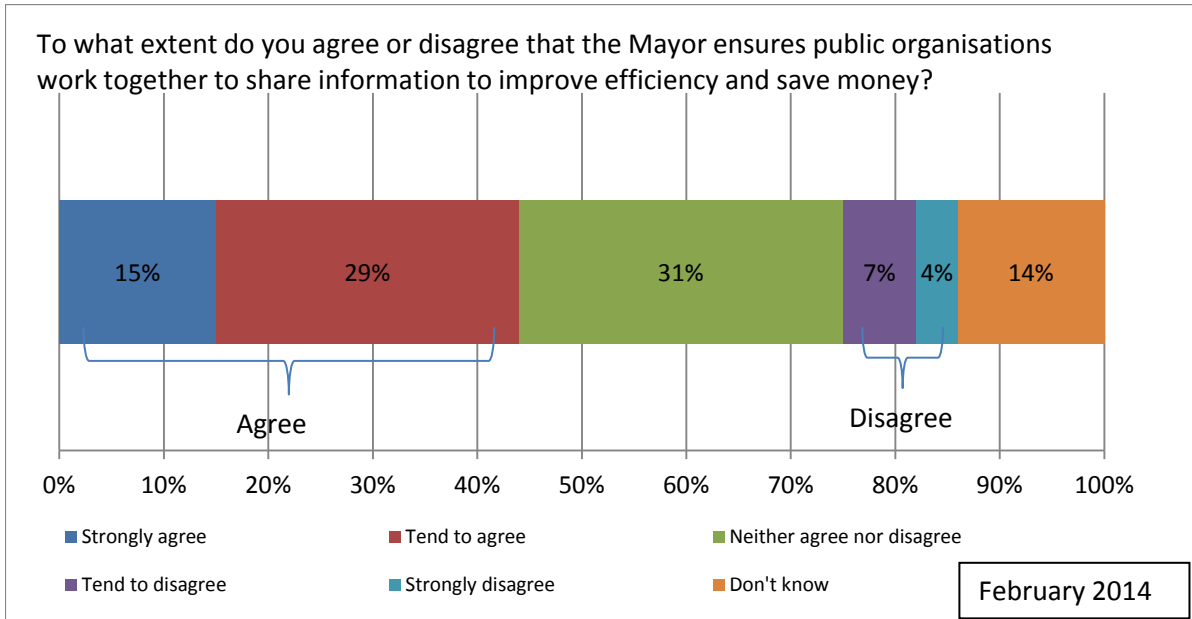
Those who said they knew about the proposals for the Met to have more access to TfL ANPR data were also more likely to support the proposal – 85% compared with 80% - suggesting that ensuring the public are informed could increase support.

Age seems to play an important role with regard to support, with older respondents more likely than younger to support the proposals (88% of those aged over 55, compared with 80% of those aged 16–34). Female respondents were also slightly more likely than males to support the proposal, 85%, compared to 82% for men.

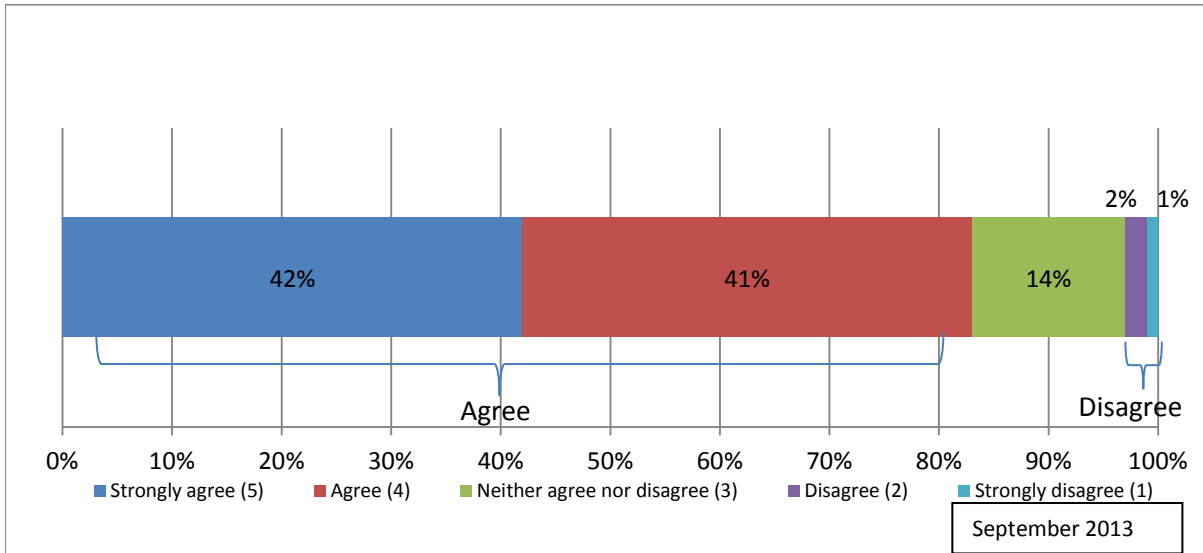### *3.4.2.2 Working together and sharing information*
More than four in 10 (44%) respondents agreed that the Mayor ensures that public organisations such as TfL and the Met Police work together and share information to improve efficiency and save money.

To what extent do you agree or disagree that the Mayor ensures public organisations such as TfL and the Met Police work together to share information to improve efficiency and save money?

To what extent do you agree or disagree that the Mayor ensures public organisations work together to share information to improve efficiency and save money?

15%	29%	31%	7%	4%	14%

Agree   Disagree

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

■ Strongly agree   ■ Tend to agree   ■ Neither agree nor disagree
■ Tend to disagree   ■ Strongly disagree   ■ Don't know

February 2014

Almost twice as many, (83%) of respondents thought that the Mayor should ensure that public organisations such as Transport for London (TfL) and the Met Police work together and share information to make them more effective and save money.

The Mayor should ensure that public organisations such as TfL and the Met Police work together and share information to make them more effective and save money

42%	41%	14%	2% 1%

Agree   Disagree

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

■ Strongly agree (5)   ■ Agree (4)   ■ Neither agree nor disagree (3)   ■ Disagree (2)   ■ Strongly disagree (1)

September 2013

Demographic differences for this more general issue around public sector organisations working together and sharing information to make them more effective are in line with those for the specific ANPR proposal. Women (85%) were slightly more likely than men (82%) to agree, while those aged 35+ were more likely to agree (86%) than those aged 16-24 (79%). The additional

difference here is that there are differences by ethnicity too with White respondents more likely to agree (85%) compared to Asian and Black respondents (79% each).

### 3.4.2.3 Using modern crime-fighting techniques and technology

55% of respondents thought that the Met police used modern crime-fighting techniques. Less than one in 10 disagreed (9%). There are a significant number that neither agree nor disagree (28%).

Taking everything into account, to what extent do you agree or disagree with the following statements? - The met police uses modern crime-fighting techniques

September 2013
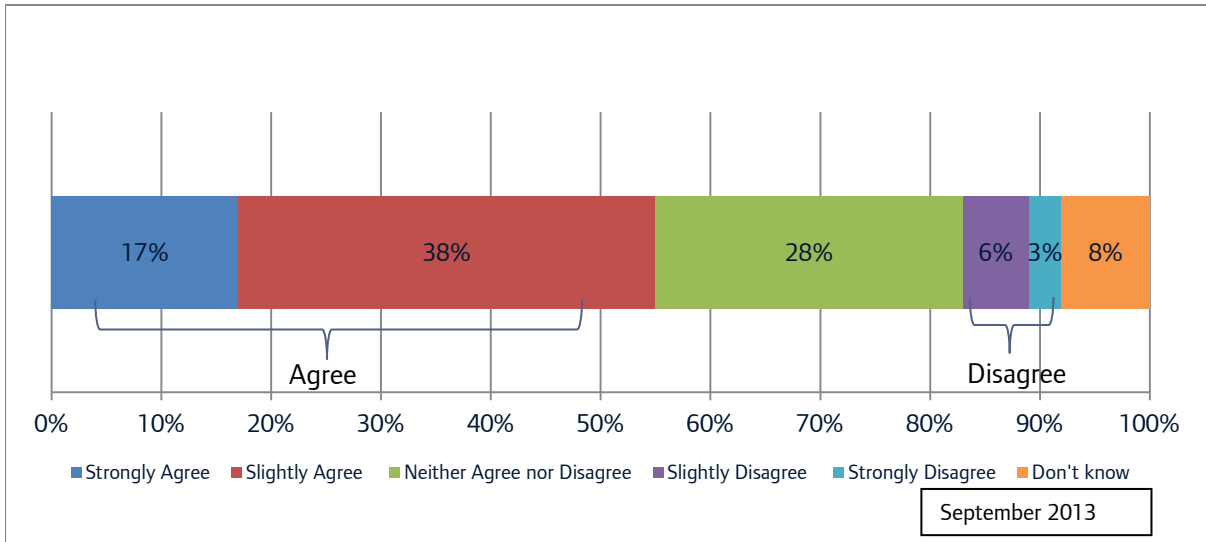
Public support for the Met Police using modern technologies to cut crime was very strong, with almost 9 in 10 (86%) agreeing that they should be able to do this. Just over one in 10 (12%) had no real view, neither agreeing nor disagreeing, while a small minority of 2% disagreed.

The Met Police should be allowed to use modern technologies to cut crime and make London safer


February 2014
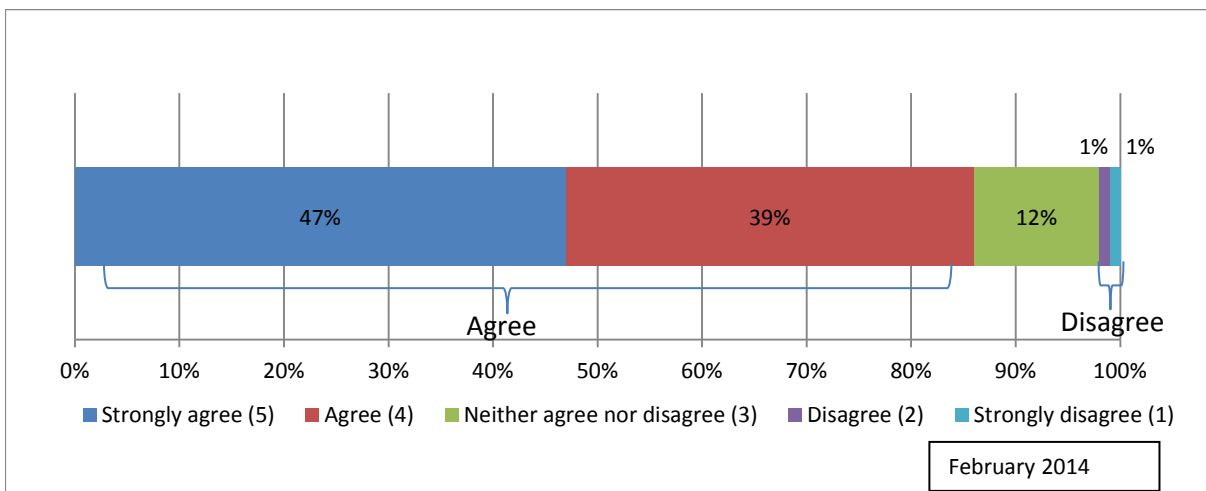
Those aged 35+ are more likely than their younger counterparts aged 16-24 to agree that the Met Police should be allowed to use modern technologies to cut crime (90% compared with

81%). ABC1 groups are also more likely to agree (88%) compared with C2Des (84%) as are White respondents (88%) compared with Black and Asian respondents (80% and 82% respectively).

3.4.2.4 Met Police access to TfL's ANPR cameras

A significant proportion of Londoners who responded, thought that the Met Police already had full access at all times to TfL ANPR cameras to help them tackle crime. In February 2014, 46% thought the Police had full access (51% in September 2013), while a further third (33%) thought they had access for most crimes, but not serious crimes. In contrast, a small proportion thought that the Police had no access at all (4% in February 2014, 3% in September 2013).

How much access do you think the Metropolitan Police currently has to these cameras to help them tackle crime?
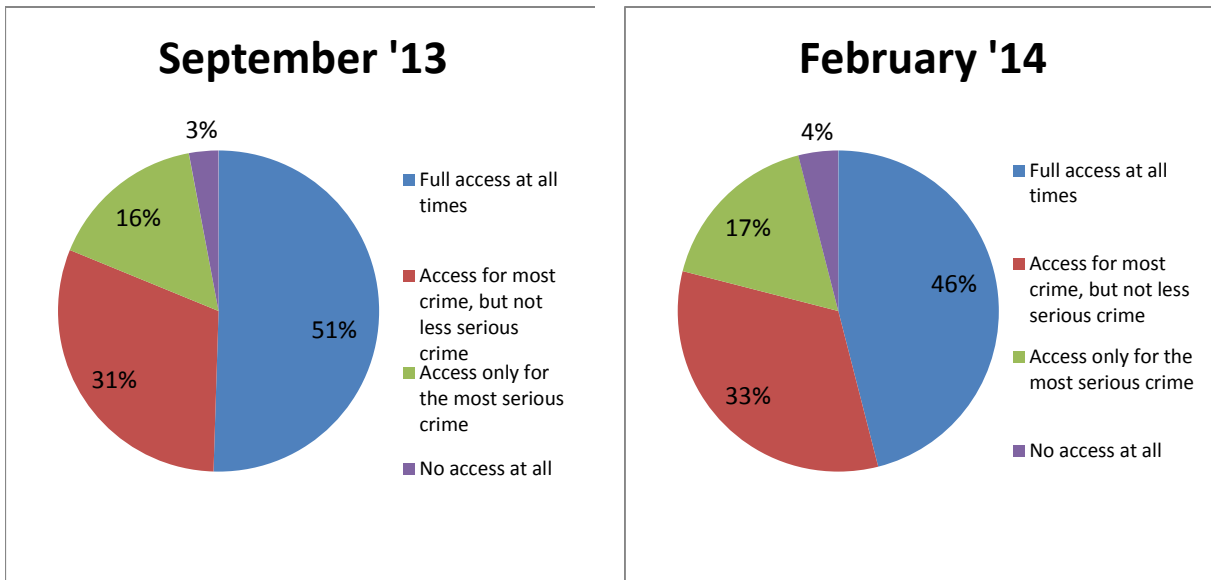
In the February poll men (48%), those aged 35+ (48%) and White, mixed race and Asian respondents (47%) were all more likely to think that the Met currently has full access at all times to TfL's ANPR data for crime solving purposes.

Londoners were asked whether they knew about the Mayor's proposal. Around 7 in 10 said they did not, while 3 in 10 answered yes. While this is relatively low, the question was pre-communications work and so the information was only available through the Mayor's 2012 manifesto.

Had you heard that the police in London would like more routine access to Transport for London's number plate recognition cameras to help them fight crime?

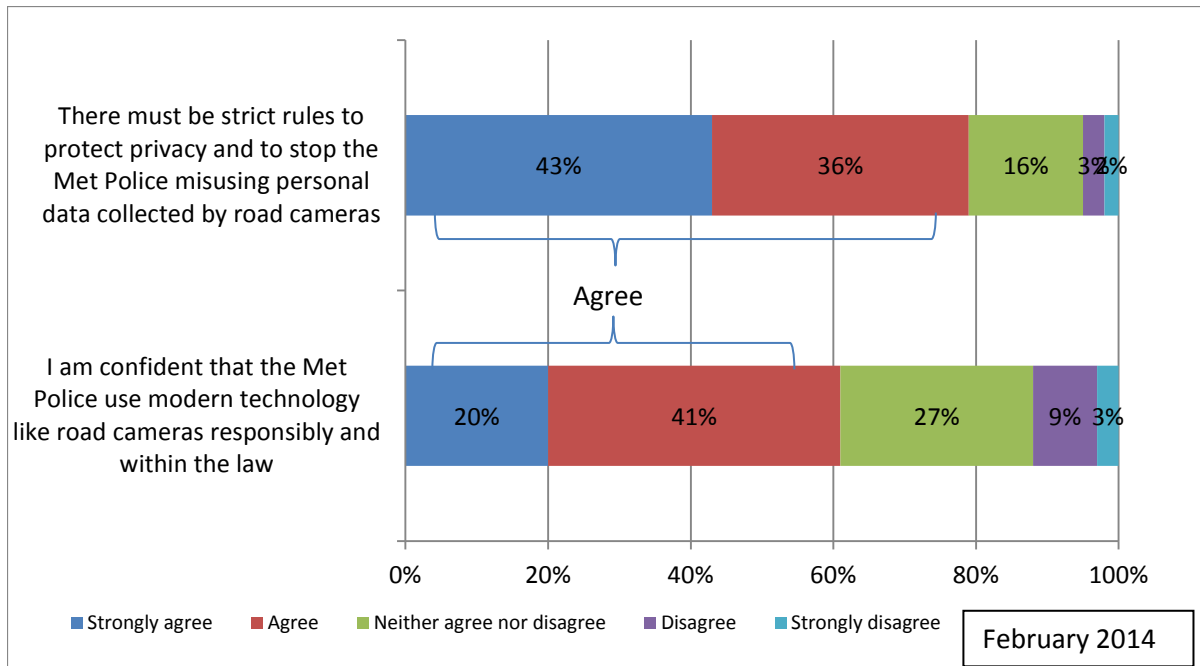| September '13	February '14
29% Yes / 71% No	31% Yes / 69% No
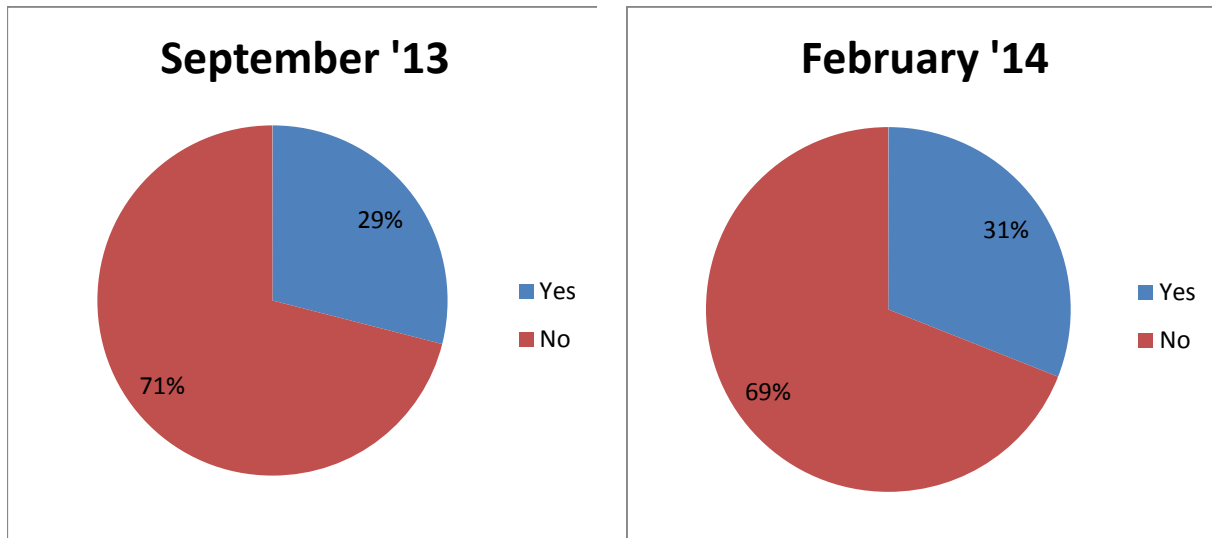
In the February poll men were significantly more likely than women to have heard of this proposal (39% compared with 23%), as were younger groups aged 16-24 (40%) compared with those aged over 35 (25%) and mixed race and Asian people (48%) compared with White and Black people (28%).

3.4.2.5 Met Police use of technology and protections against data misuse
Respondents generally agreed that there should be strict protections in place to ensure that the personal data that the Met Police has access to via ANPR cameras is used properly; 79% agreed that this is the case, while only 5% disagreed.

So protections are important, but the majority (61%) were also confident that the Met Police already uses modern technology, like road cameras, responsibly, whereas only 12% were not.

There must be strict rules to protect privacy and to stop the Met Police misusing personal data collected by road cameras: Strongly agree 43%, Agree 36%, Neither agree nor disagree 16%, Disagree 3%, Strongly disagree 1%.

I am confident that the Met Police use modern technology like road cameras responsibly and within the law: Strongly agree 20%, Agree 41%, Neither agree nor disagree 27%, Disagree 9%, Strongly disagree 3%.

February 2014

Those aged 35+ were more likely than those aged 16-24 to agree that strict rules are needed to protect privacy (81% compared with 76%) as were ABC1 socio-economic groups compared with C2DEs (81% versus 77%).

These differences were not apparent when asking whether people were confident that the Met Police use modern technology like road cameras responsibly and within the law. The only difference here was between ethnicities, where all groups (an average of 62%) were more likely than Black respondents (56%) to be confident in police use of modern technology.

3.5 Consultation survey

In all 2,315 responses were made to the survey open to all Londoners. This response was elicited from the communications and marketing activity outlined earlier, but in brief included:

- An email to 562,000 Londoners registered to receive information about the Congestion Charge and Low Emission Zone.
- 90,000 leaflets delivered to community buildings, Met Police and MOPAC community meetings.
- Social media activity through MOPAC and Talk London.
- Visibility on the homepage of the GLA website.

3.5.1 ANPR and a safer London

To what extent do you agree or disagree that sharing TfL ANPR camera data with the Police makes London safer?
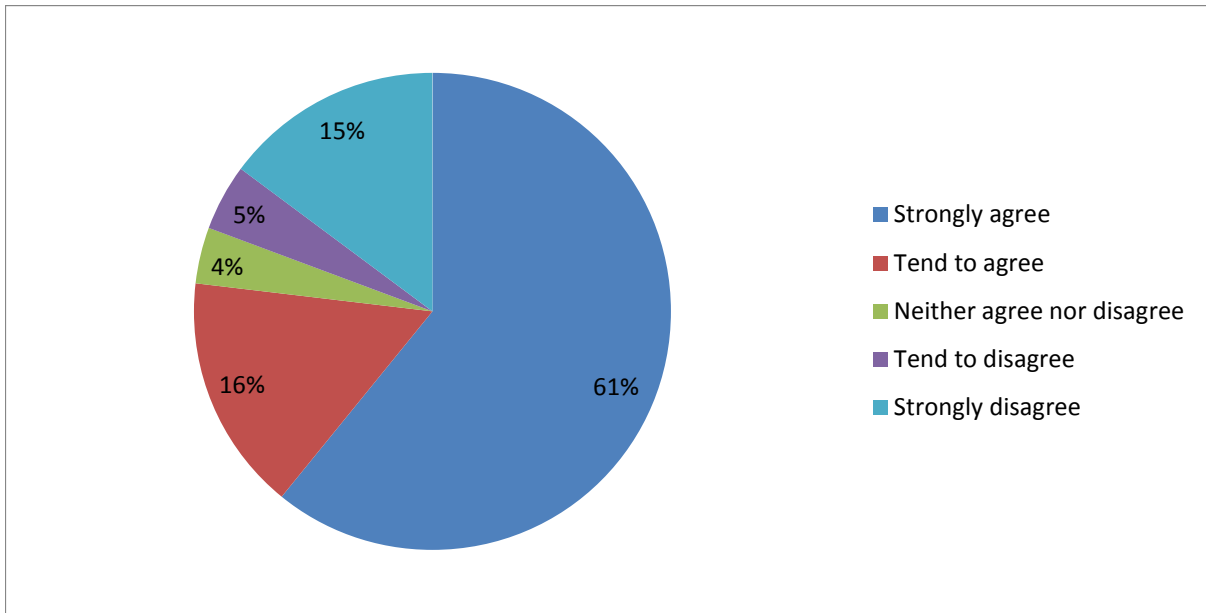
Almost 8 in 10 Londoners agree that sharing TfL's ANPR cameras with the Met Police will make them safer. Agreement is strong with 61% strongly agreeing with this statement. Less than two in 10 disagree, while nearly 4% neither agree nor disagree.

3.5.2 Police access to ANPR

Do you think the police should have access to data collected by these cameras to help them tackle crime?
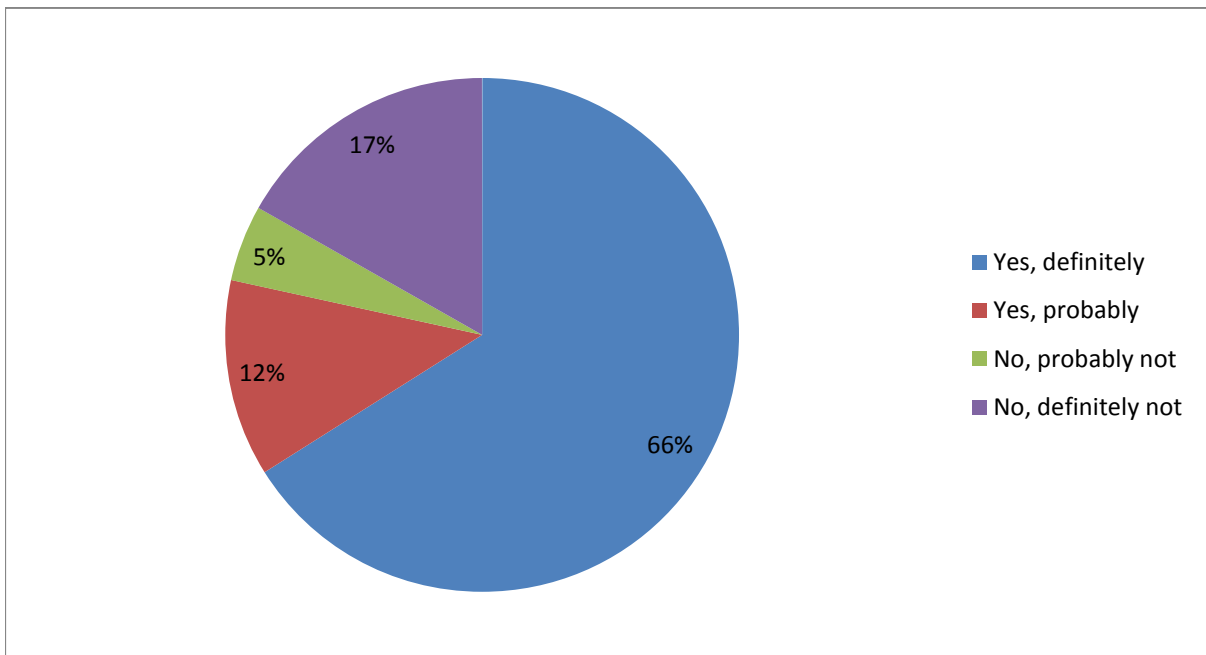
Almost 8 in 10 Londoners support the Mayor's policy to give the police access to TfL's ANPR cameras to help them tackle crime. Support is generally strong, with almost two thirds of all Londoners (66%) saying that they definitely support this policy, while just under two in ten (17%) definitely not supporting it.
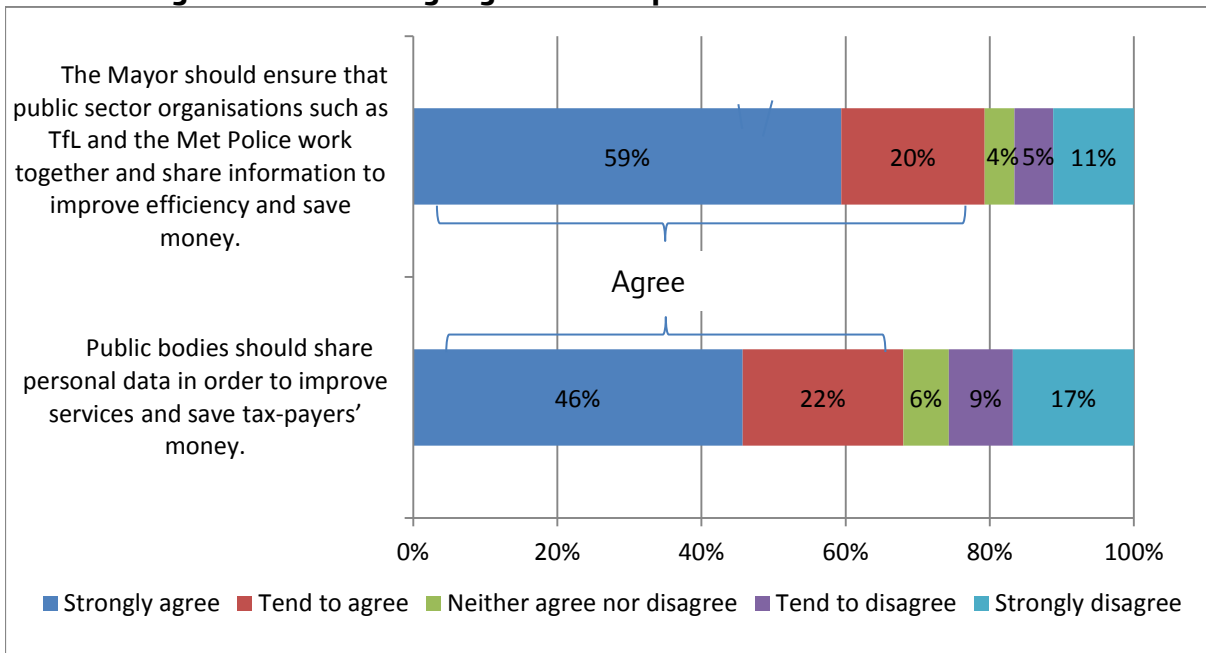
3.5.3 The Met Police and modern technology

**The Met Police should use modern technology to help them fight crime**
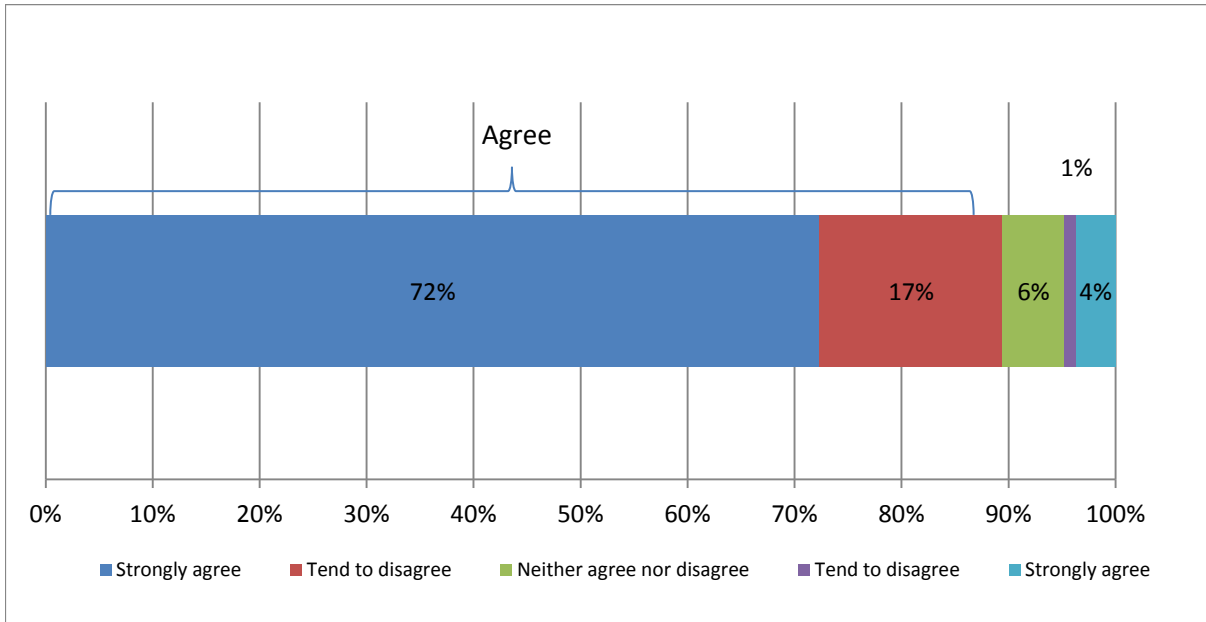
Londoners overwhelmingly support the Met Police using modern technology to help them fight crime. 72% strongly agree, with a further 17% tending to agree. Only one in twenty disagree.

3.5.4 Sharing data and working together to improve services

Generally Londoners agree that public bodies should work together and share information, including personal data in order to improve services and save money. Agreement is stronger where there isn't personal data involved with almost 8 in 10 (79%) agreeing, but there remains significant support where personal data is involved too with almost 7 in 10 (68%) agreeing. This suggests trust remains, though some do have concerns.

3.5.5 Keeping personal data safe and the Police
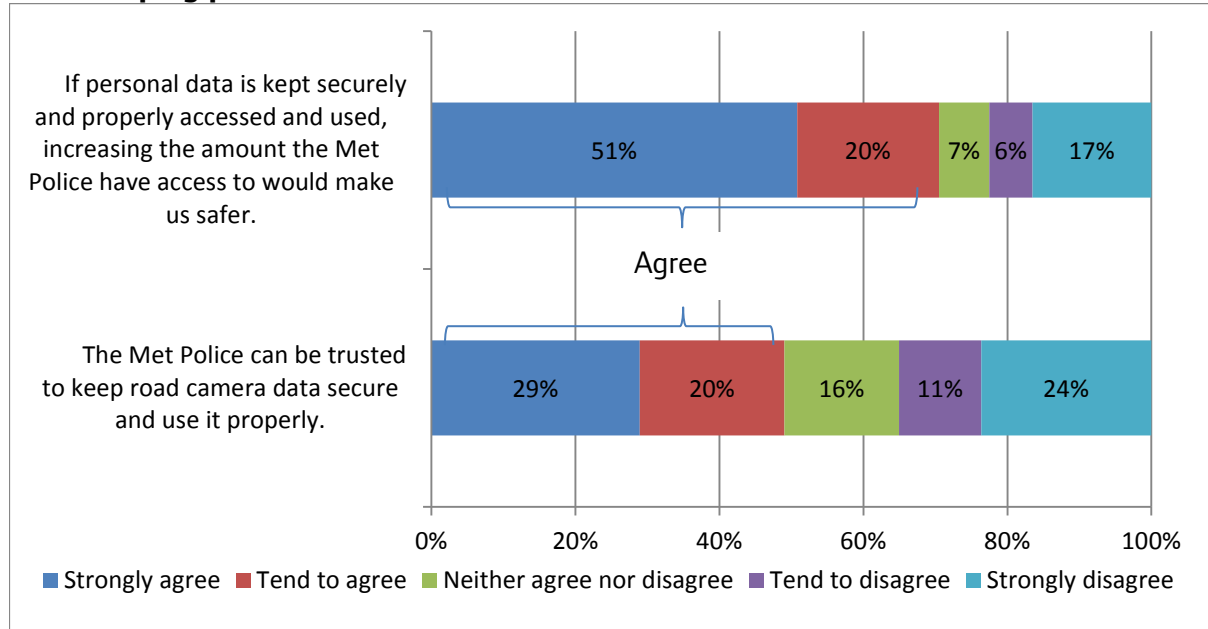
Londoners, in the main, agree that, if data is kept securely and properly accessed and used, increasing the amount the Met Police have access to would make them safer. Just over 7 in 10 agree, while just over 2 in 10 disagree.

However, this is in the context of a more mixed view of whether the Met Police can actually currently be trusted to keep road camera data secure and use it properly. Agreement is still the more prevalent response, but lower at just under half (49%), while disagreement reaches just over a third (35%). A larger proportion here are undecided too, with 16% neither agreeing nor disagreeing, suggesting that perhaps more public information is needed about how data is kept safe and used.

3.5.6 The perceived pros and cons of ANPR
Respondents were also given the opportunity to complete open-ended questions in the consultation survey. People used this opportunity to outline both positive and negative responses. Positive comments, recognised the value in one way or another to London, predominantly in catching more criminals, while others saw no value, or certain issues outweighing the benefits to them.

3.5.6.1 The benefits
The positive comments people made are summarised under the following themes:

3.5.6.1.1 Making London safer

The majority of comments made around the benefits related to safety being improved across London as a result of the police being able to do a better job with more camera data at their disposal. This covered a number of areas:

- **Helping reduce and solve crime** was seen as an important element and this was the most often cited benefit. People expect access to more ANPR data to improve police efficiency and effectiveness.
- **Catching more criminals** was closely associated with safety in London, with fewer criminals on the street; people logically see it as making London safer and being a benefit to them.
- **Deterring more crime** was seen as a key benefit. The more criminals see that it is difficult to commit crime using roads the more they are deterred from committing crime that involves using a car, and generally as a result this should help cut crime.
- **Small offences** such as driving without insurance or road tax was seen as a key issue, people particularly saw this as a use of ANPR. This perhaps belies a slight misunderstanding of the purposes for which the police use ANPR, and also the severity of cases it can actually contribute to solving.
- **Fighting terrorism** is still seen as a major concern for Londoners responding to this survey and these people brought up the value this additional information for the police could have in combatting any national security threat posed.

3.5.6.1.2 A more efficient and better equipped police force

- **Saving time** for the police using automated technology was seen as a key gain, particularly where people made the connection between the cost and the taxes they pay towards policing their streets.
- **Saving money** was often used in the same context as saving time. Being able to solve crime more easily without such a high police resource where possible was seen as an important gain of having access to more ANPR data.
- **Being well-equipped** was generally seen as an important factor for the police – they are there to keep citizens safe and should have access to the resources they need in order to ensure this is done to the best of their abilities.
- **Using technology**, similarly to being well-equipped, this was seen as an important issue for the police – they should be technologically up to date and not have to suffer only being able to use traditional techniques to solve crime.
- **Proactive policing** was mentioned as a thing that could be bolstered using ANPR technology as the police would be able to identify where criminals were active and potentially reduce the threat of crime as a result.
- **Duty to use data available** if it is there. There were a number of respondents that suggested it would essentially be negligence if the police knew that there was data that existed that could help them solve a crime, but they didn't use it.

3.5.6.1.3 Road safety

- **Speed limit enforcement** was seen as a possible good use of ANPR. This suggests that the public aren't fully aware of the difference between ANPR cameras and speed enforcement cameras, suggesting information needs to be clear about what ANPR can and can't be used for.
- **Improved driving** was suggested as a spin off benefit, with drivers knowing that there are more cameras watching them. Hit and run was an issue raised several times here, with people

suggesting that it would be harder for people to get away with it and so they may well be more careful in the first place.

3.5.6.1.4 Victims

A number of people mentioned that they had been victims of crime. There were two distinct issues raised here:

- Many were supportive of any measure that could help catch criminals and felt particularly strongly about this, having been affected by crime in the past.
- A few raised the issue of police resources to use this additional data they had been given. They had experienced crime where there was clear CCTV coverage but the police had been unable to lend the resources to the crime and use the footage available.

3.5.6.1.5 Cyclists

Cyclists were mentioned as part of this, despite ANPR coverage not capturing their images. There were two sides to this:

- It may help keep cyclists safe, where cars are involved in accidents, or by encouraging safer driving knowing there are more 'eyes on the street'.
- It could be used to help catch cyclists acting illegally or dangerously.

3.5.6.2 The issues

The issues respondents raised focussed on the following themes:

3.5.6.2.1 Freedom/civil liberties

- **Privacy** - there was a general feeling that the ever increasing ability of the authorities to observe the public impinges on their freedom to live their lives in private. Some people refuted the assertion that if you have done nothing wrong you have nothing to fear and suggested that they simply have the right not to be watched.
- **Proportionality** of response and the consideration of whether the benefits to using ANPR outweighed the impacts on individuals' civil liberties was seen as important. The question was asked as to whether the benefits would ever outweigh the impacts on their civil liberties. For others, less negative, proportionate use was appropriate only for the most serious crimes.
- **Creep** of acceptable use was mentioned as a fear, with some expecting that as with the camera use initially being for congestion charge enforcement only, but now use being expanded, a similar situation would occur in the future where the data was appropriated for further use that was not agreed when the infrastructure was built.
- **Discrimination** - a small number of respondents suggested that ANPR cameras could be used in a targeted way which discriminated certain groups, such as ethnic minorities. Any intrusive and under-regulated technology is at risk of clumsy and discriminatory deployment, harming community trust.
- **Data Protection Act** – some suggested that this proposal contravened the DPA and was therefore illegal.
- **ANPR collection, retention, sharing and access** – using the data for intelligence, through data mining is a problem. This approach, trawling data, turns all who use the roads into suspects worthy of preliminary investigation. Interception uses of the data link the data to other 'hotlists' to trigger an alert. The problem with this approach is that these 'hotlists' are not always linked to criminality, accurate or up to date and so alerts may be for a wide range of vague and unsubstantiated reasons.

- **Chilling free speech and association** – police access to the proposed level of ANPR cameras and the tracking capability this gives to the police may well serve to chill the exercise of peaceful dissent rights.
- **Unlawful** – the current police use of ANPR may be in breach of Article 8 or the European Convention on Human Rights. Liberty believes that current UK police use of ANPR is unlikely to withstand legal challenge.

3.5.6.2.2 Number of cameras and over-surveillance
- **Prevalence of cameras** - London was cited by respondents as being the most 'camera heavy' place in the UK, if not the world and questioned why that was necessary and suggested that this proliferation of surveillance made them uncomfortable.
- **Impact on crime** - despite having a high number of surveillance cameras people suggested that the crime rates remaining relatively high in London suggesting that they aren't working as they should in terms of deterring and reducing crime.
- **Need for more cameras** - people were uncertain as to whether we really needed more cameras given the number that we already have in London. Is it actually going to make that much difference to policing or further surveil an already over-surveiled public?
- **Mass surveillance of innocents' location data** – 73% of the eligible population has a driving licence and 75% of households have access to a car or van. Because of the extent of the surveillance network this means millions of innocent people are tracked every day and have their personal data retained and processed despite not being suspected of a crime.

3.5.6.2.3 Mistrust of the police and data security.
There was a mix of feeling here focussing on the following issues:

- **Abuse of power** was brought up in a number of cases, with people outright not trusting the police to act properly with personal data, to use it to persecute particular groups and follow individuals who were suspects but had not necessarily done anything as yet, effectively breaching their right to privacy.
- **Human error** was less an issue of mistrust, but the track record of the police and other public institutions was a major concern for many people responding. What evidence is there to show that data won't be lost or misappropriated again? Some people suggested that the police should be made to prove themselves as a secure user before they were given access to more data.
- **Creep** of the use of the data was also brought up as a concern here, with some feeling that this step to change the purpose of use of the data from congestion charging to crime use was just the first step of a stealthy creep towards it being made available for other uses too.
- **Evidence of value** there were a small number of people that asked that there be evidence of the value of giving the police access to this data before a decision is made so that the pros and cons can be clearly and objectively assessed.
- **History of police use** – concerns around the first tests in 1984 were responded to with the police saying that they would not be used for anything other than detecting stolen cars, yet.
- **Lack of evidence** – ANPR is clearly a tool that can be of use to police. But there is a glaring lack of evidence around its efficacy. More evidence should be provided to detail the number of records generated, and the outcome of arrests and investigations in which ANPR was used.

3.5.6.2.4 Guidelines and protections

While people were worried about civil liberty impacts on further access to camera data, it was not always in the context of disagreeing with the policy, but also alongside a desire to ensure that where this data was available it was used properly. This was an issue raised often in tandem with concerns with the police's trustworthiness and ability to deal with the data properly.

- **Human error** was seen as something that cannot be overcome and to mitigate the risk of an honest mistake, checks and balances needed to be in place that made a mistake hard to make.
- **Auditing** was seen as integral to ensuring the data was used in the proper way and that ongoing checks were made so that standards didn't slip and any issues or unanticipated risks were identified and dealt with as a matter of course.
- **Independent oversight** was suggested by a small number of people as a way to get impartial confirmation that the data was used properly and that there were no hidden agendas in how it was accessed and used.
- **Sharing data** with other governments and agencies from this additional use of ANPR data was seen as a potential risk and something the public do not want to see happen.
- **Penalties for misuse** were suggested to act as a deterrent to data misuse.

3.5.6.2.5 Revenue enhancing

- **Automated traffic enforcement** was an expected use of these ANPR cameras by the police. The public were not supportive of this and suggested that it could be used simply to raise funds rather than as a serious crime-fighting technique.
- **Commercialisation of data** was seen as an issue, with a number of people seemingly mistrusting public organisations not to sell data onto third parties. However, there was an individual who actually suggested that this would be a sensible step in order to fund the work.

3.5.6.2.6 Level of use

- **Serious crime** was generally accepted as the most appropriate use of this data (though there are of course people that think that even this is not appropriate given their perceived risk to civil liberties of giving the police access to more data).
- **Access on request** rather than as a matter of course was suggested by some as a more appropriate use of this data; ongoing access as a matter of course was seen as a way to use the data for minor offences.
- **Minor road use offences** were often brought up as offences for which the data should not be used to enforce against. This is contrary to many comments under the benefits section which suggested better ANPR coverage for the police could be very useful in combatting tax evasion or uninsured cars.
- **Issuing parking tickets** using this technology was raised as a concern, people did not feel this was a proportionate use and it was seen as a revenue raising exercise rather than a genuine attempt to address illegal activity or catch serious criminals.

3.5.6.2.7 Threat to personal security
ANPR alert triggers can give rise to police pursuits; there are examples of innocent people having been killed or injured in these pursuits.

3.5.6.2.8 Current access
for many people was thought to be already in place, or seen as a 'no-brainer' and something that should just be given as a matter of course.

3.5.6.2.9 Lack of public knowledge – the creep of ANPR without public or parliamentary mandate undermines the bedrock principle of policing by consent. The public cannot consent to what they have insufficient knowledge about.

3.5.6.2.10 This policy breaks earlier promises made when the Congestion Charge Zone was initially implemented, which stated that the enforcement cameras would not be used for any other purpose than for congestion charging.

A number of people made the assumption that the decision to allow the Met Police access to TfL's ANPR cameras had already been taken and that this consultation would not affect that outcome.

3.5.6.3 General neutral comments
General comments respondents made, neutral in content, included:

3.5.6.3.1 People with nothing to hide have nothing to fear was a strong sentiment from a number of people. Though some brought up the issue of being too watched, many felt that if they weren't doing anything wrong then it didn't matter who was watching.

3.5.6.3.2 Balance of relevant and proportionate use was a sentiment some respondents thought the police needed to give consideration to. In general these people were keen for ANPR to be available to the police but only for more serious crime, and perhaps only on request rather than on a continual basis.

3.5.6.3.3 Information on the proposals were requested by some who felt that not all their questions were answered for them to make a decision on whether they should support or oppose this proposal. Information was particularly sought on the protections used and the procedures the police would undertake when using this data.

3.5.6.3.4 Data security was an ongoing issue raised, not necessarily in a negative context, but as an issue to be mindful of. People were wary that things could go wrong and keen that every risk was mitigated against.

3.5.6.3.5 Police on the street were cited by many as an ongoing requirement. ANPR use was seen, by these people, as a complementary policing technique, and not something that could replace bobbies on the beat.

Appendix A: Telephone survey question

TfL have around 1400 cameras on major roads, collecting number plate data which is currently used for identifying vehicles to receive congestion and low emission zone charges. In an effort to crack down on crime and track known offenders the police would like to be able to use this data too.

Do you think the police should or should not be given access to data collected by these cameras?

	Base: all 1,000
Yes –definitely	
Yes – probably	
No – probably not	
No – definitely not	
Don't know	

Appendix B: Online survey questionnaires

September 2013 - ANPR consultation questionnaire
Efficiency and savings:
1. To what extent do you agree or disagree that the Mayor ensures public organisations such as TfL and the Met Police work together and share information to improve efficiency and save money? [Strongly agree to strongly disagree]

Confidence in policing:
2. Taking everything into account, to what extent do you agree or disagree with the following statements?
   a) I have a lot of confidence in the police in London
   b) The met police use modern technologies

[Strongly agree, agree, neither agree nor disagree, disagree, strongly disagree]

Existing expectations of camera data use:
3. Transport for London uses cameras that automatically recognise vehicle number plates (ANPR cameras) to enforce the Congestion Charge and Low Emission Zones. How much access do you think the Metropolitan Police currently has to these cameras to help them tackle crime?
   - Full access at all times
   - Access for most crimes, but not less serious crime
   - Access only for the most serious crimes
   - No access at all

Knowledge of and support for changes:
4. TfL have around 1400 cameras on major roads in London, collecting vehicle number plate data which is currently used to enforce congestion and low emission zone charges.

   A) Had you heard that the police in London would like more access to Transport for London's number plate recognition cameras to help them fight crime?
   Yes/No

   B) Do you think the police should or should not have access to data collected by these cameras to help them tackle crime?
   Yes –definitely
   Yes – probably
   No – probably not
   No – definitely not
   Don't know

February 2014 – ANPR consultation questionnaire

1. To what extent do you agree or disagree with the following statements:
   a) The Mayor ensures public organisations such as TfL and the Met Police work together and share information to improve efficiency and save money
   b) The met police use modern technologies
   - Strongly agree
   - Tend to agree
   - Neither
   - Tend to disagree
   - Strongly disagree

2. Transport for London uses cameras that automatically recognise vehicle number plates (ANPR cameras) to enforce the Congestion Charge and Low Emission Zones. How much access do you think the Metropolitan Police currently has to these cameras to help them tackle crime?
   - Full access at all times
   - Access for most crimes, but not less serious crime
   - Access only for the most serious crimes
   - No access at all

3. TfL have around 1400 cameras on major roads in London, collecting vehicle number plate data which is currently used to enforce congestion and low emission zone charges.
   a) Had you heard that the police in London would like more access to Transport for London's number plate recognition cameras to help them fight crime? [Yes/No]
   b) Do you think the police should or should not have access to data collected by these cameras to help them tackle crime?
   - Yes definitely
   - Yes probably
   - No, probably not
   - No, definitely not

Appendix C: ANPR information leaflet

MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

TACKLING CRIME WITH ROAD CAMERAS

We want to use more road cameras to tackle crime and keep London safe.

We'd like to know what you think.

MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

We want London to be the safest big city in the world. That means using the best available technology to help cut crime and bring more offenders to justice.

The Met Police currently uses Automatic Number Plate Recognition (ANPR) cameras to investigate and solve crimes and to stop vehicles that have been linked to crime.

With access to Transport for London's (TfL) 1,300 ANPR cameras, the Met Police's coverage would triple.

Tell us what you think

Over the past year, we've gathered strong evidence that giving the Met Police routine access to TfL's cameras would help cut crime. But what do you think?

Call our Public Liaison Unit on: **020 7983 4100** for a short survey to be sent to you or complete it at **talk.london.gov.uk/road-cameras**

Closes 8 April

Appendix D: Online content

London.gov homepage

MOPAC pages

Online content page

Cutting crime with road cameras

We want London to be the safest big city in the world. One way we can do this is to use the best available technology to help cut crime and bring more offenders to justice.
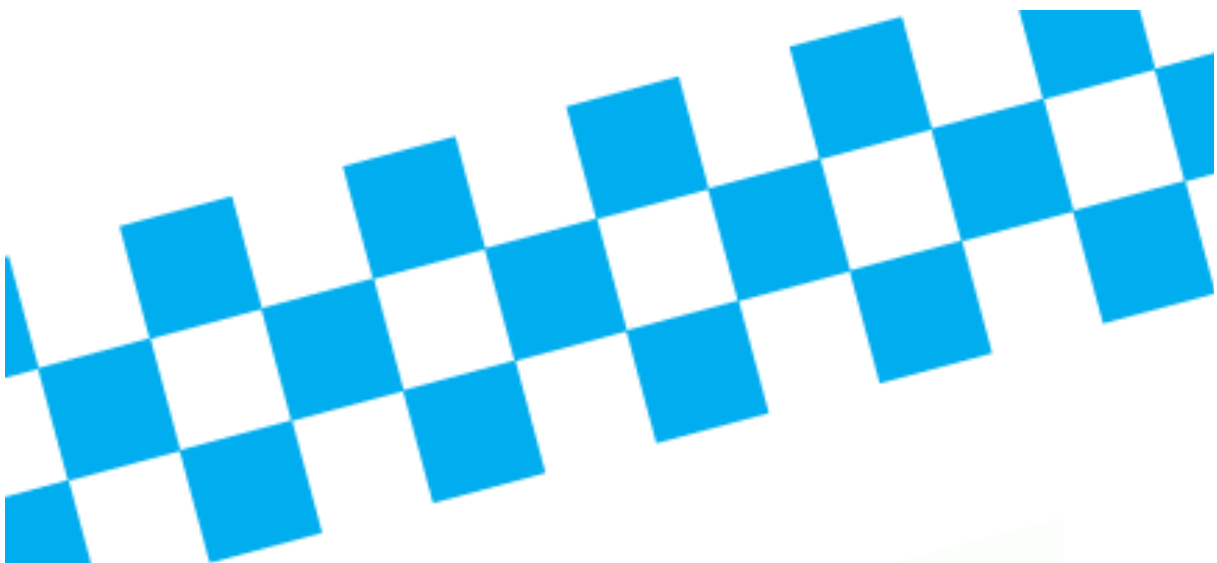
The Met Police already use Automatic Number Plate Recognition (ANPR) data to help keep London safe. They use it to investigate and solve crimes, and to stop vehicles that have been linked to crime. However, the Met Police's ANPR camera coverage in London is patchy. Better coverage would make London safer.

If London's police also had access to Transport for London (TfL)'s 1,300 ANPR cameras, it would triple their level of coverage. These cameras are currently used to enforce the capital's congestion and low emission charges. They could also be used to solve and prevent crime.

Over the past twelve months we have been testing this approach. We now have robust evidence that giving the Met Police access to TfL's cameras would help prevent crime and improve detection rates. We have also gathered strong public support for this proposal.

Why we believe it would be good for London

Giving the Met Police full access to TfL's ANPR cameras would:

- **help the police make London even safer** by allowing the Met Police to detect more crime, act more swiftly and build stronger cases against criminals
- **stop criminals using London's roads** by making it more likely criminals will be detected and or stopped
- **save money** as it would cost the Met Police almost £32 million to build the equivalent ANPR camera coverage. They will also save time and resources finding criminals or collecting camera footage from third parties.

Protecting personal data

In his 2012 Crime Manifesto, the Mayor promised that ANPR data would be used across London to help the police find vehicles linked to crime. He also promised that this change would not create a Big Brother state. The Met Police would only use the data to protect the capital from crime.

This data will be used in accordance with the Data Protection Act. The Met Police will follow their own strict guidelines to manage London's ANPR data.

If the Met Police share any data with the national ANPR database, there are strict national guidelines.

The Met Police will produce a full Privacy Impact Assessment for this project which will look in detail at all possible issues and how they will be solved. This will be informed by the public's views and a final version will be published in spring 2014. View a Draft policy summary (PDF).

Tell us what you think

What do you think about these proposals? Please let us know by taking this survey by 8 April.

Appendix E: Example Tweets

MOPAC @MOPACLdn · Mar 11
2/2 Engagement underway on #police use of Automatic Number Plate Recognition cameras to fight crime in London: london.gov.uk/priorities/pol... #ANPR
Expand   ⬆ Reply   ⟲ Retweet   ★ Favorite   ⋯ More

MOPAC @MOPACLdn · Mar 11
1/2 Deputy Mayor is hosting a roundtable with stakeholders to discuss @metpoliceuk plans to access #ANPR data from @TfLOfficial road cameras
Expand   ⬆ Reply   ⟲ Retweet   ★ Favorite   ⋯ More

GLAINTELLIGENCE

MAYOR OF LONDON