



## EQUALITY IMPACT ASSESSMENT

Follow the [Equality Impact Assessment \(EIA\) policy](#) when completing this form.

Need some help? If you are unsure of any of the questions, click the 'GUIDANCE' button which provides key information about each step.

You can also contact the [Strategic Inclusion and Diversity Unit](#) for guidance and support.

FOIA INFORMATION						GUIDANCE
Protective Marking	Not Protectively Marked	Publication Scheme	Yes			
Title	ANPR					
Branch / OCU	Met Intelligence - MO2					
Date Created	20/10/21	Review Date	20/10/22	Version	1	
Author	Detective Inspector Neil Patmore					

STAFF INFORMATION						GUIDANCE
Person Completing EIA		DI Neil Patmore				
Signed	Electronic				Date	20/10/21
Person Supervising EIA/SLT Approval		DCI Phil Darwent				
Signed	Electronic				Date	20/10/21
Quality Assurance Approval						
Name	Layla Williams-Carr	Unit	Strategic Diversity and Inclusion	Date	20/10/21	

Once quality assurance approval is granted, please send a copy of the EIA to the [Strategic Inclusion and Diversity Unit](#). (This form does not apply to corporate policy).

DECISION MAKING			GUIDANCE
Reject the proposal / policy	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Implement the proposal / policy	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Produce an alternate proposal / policy (if so, a new EIA must be completed)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<b>SLT (B)OCU / Management Board endorsing decision</b>			
Name	Phil Tomlinson	Rank / Grade	D/Supt

**Please note: The information on this page is retained, it is not published.**

# EQUALITY IMPACT ASSESSMENT

## STEPS 1 TO 7

### STEP 1. Aims and purpose of the proposal / policy

#### GUIDANCE

#### The Proposal

##### Scope of the project

This project is a response to changes made in the TfL ANPR infrastructure as they expand the geographical area of the Ultra-Low Emission Zone (ULEZ).

With the expansion of the ULEZ TfL will be fitting ANPR cameras at approximately 800 new sites around London and upgrading their network infrastructure.

This offers 4 key opportunities and challenges for the MPS:

- 1) Unless the MPS re-configures its connection to the TfL camera infrastructure it will lose access to reads from all current TfL cameras.
- 2) By re-configuring the connection to the TfL network the MPS will receive still images to corroborate the TfL ANPR data that they already take.
- 3) Re-configuring the connection to the newly expanded TfL camera infrastructure will create the opportunity for the MPS to replace some of its more aging and potentially least reliable / accurate camera stock with brand new TfL cameras on a like for like basis.
- 4) Re-configuring the connection to the newly expanded TfL camera infrastructure will also create the opportunity for the MPS to take reads from new additional ULEZ expansion sites if this is deemed proportionate and necessary in the future.

Under this project the MPS is proposing to immediately reconfigure its connection to the TfL ANPR network so that it has access to the imagery which supports the TfL ANPR data it currently receives. This will also create the necessary network connections for the MPS to take reads and imagery from any of the new TfL ULEZ cameras in the future.

- It should be noted that this document will not consider the equality impact of taking reads from any additional sites as these sites have not yet been identified.
- Any decision to take reads from additional sites in the future will follow a comprehensive, strategic assessment of the wider ANPR infrastructure and be subject to an internal governance process based on a case for operational proportionality and necessity.
- Privacy and equality impact will be assessed as key elements of this process and this document will subsequently be updated accordingly.

##### Benefits to the MPS, the public and other parties

- **Enhancing the accuracy and evidential value of the MPS ANPR system**

Since 2015 the MPS has taken reads from all TfL ANPR cameras. However, currently the MPS only receives the data not the accompanying visual imagery. This prevents the corroboration or correction of the data significantly limiting its evidential value and overall accuracy.

All ANPR cameras occasionally misread number plates and as a result vehicles are either missed or wrongly identified. This is why the National ANPR Standards for Law Enforcement (NASPLE) sets a 95% accuracy benchmark for ANPR systems.

The accompanying imagery from ANPR cameras allows users to confirm the make, model, colour and VRM of the vehicle

in question and corroborate the accuracy of the textual data. Thus any potentially anomalous reads can be checked and errors corrected.

This is valuable in confirming critical individual reads, maintaining overall data accuracy and identifying faults in cameras or the wider infrastructure.

Every uncorrected ANPR misread creates potential for vehicles to evade legitimate law enforcement but also for other innocent vehicles / owners to be brought under suspicion and investigated without justification. As has been highlighted by recent cases in the media, this can lead to further intrusive checks being conducted on individuals, them being contacted by the police, or even arrested. These cases have a negative impact on the individuals involved and the confidence of the wider community in the entire capability.

Camera imagery is also essential for those rare occasions where an ANPR read is to be used in evidence as it will address most of the concerns about the potential for inaccuracy in the data reads.

Additionally, the checking of imagery is a valuable tool in countering the deliberate switching of VRM plates and other attempts to evade detection / identification by the ANPR system.

For the above reasons the capture of imagery alongside ANPR reads is a key requirement of the NASPLE and other regulatory guidance.

The current absence of imagery from the TfL ANPR data was highlighted as a risk at the time of the original 2015 data sharing arrangement and there is a long standing agreement with regulators and the National ANPR data controller that the MPS will endeavour to address this anomaly as soon as possible.

It is important to note that the field, angle and quality of the images is also closely governed by the NASPLE to prevent any additional private information being captured.

- **Retention of access to the current TFL ANPR reads**

Daily, the MPS receives around 8-10 million ANPR reads for the London area and 6-8 million of these come from the TfL system. This therefore makes up 75-80% of the local capability.

Clearly the vast majority of ANPR reads capture vehicles which have no involvement in criminality and these reads will never be viewed or developed. However, in a significant minority of cases the vehicles captured will have been used by those involved in crime and analysis of that data can be invaluable in bringing offenders to justice and protecting the public.

The benefits to the public of police use of ANPR have been established over many years. The integrated ANPR system in London helps the MPS to uphold national security, public safety and the economic well-being of the country, prevent disorder and crime, and protect the rights and freedom of others.

The ability to carry out live-time and historic ANPR searches is essential for policing to support operations and investigations in line with current MPS objectives. Having access to ANPR data helps the MPS to solve crime more efficiently / effectively and has a positive impact on the quality of life of residents within London and a wider area.

Some of the key operational benefits of the current MPS ANPR system are:

- The Identification and location of vehicles/offenders involved in criminality.
- Intercepting vehicles involved in criminality and therefore deterring, disrupting and detecting offending.
- Prioritizing the allocation of policing resources and methods of intervention.
- Post incident interrogation of ANPR data to identify offenders and evidential opportunities.

Reads from ANPR cameras have for example played a role in the investigations into all of the major terrorist incidents over the last 7 years as well as the wider security plans that keep our Government buildings, tourist sites and other vulnerable locations safe.

At a serious crime level ANPR data is utilised in every serious investigation where the suspect is known or suspected to have travelled by vehicle. In combination with CCTV and mobile phone data it is critical in identifying and locating a large proportion of the most dangerous criminal subjects in London.

In 2020 for example the MPS Central ANPR team received 33,000 requests for assistance, 500 of which were in relation

to CT matters. Unfortunately, there is no means to retrospectively review all these investigations to show what value ANPR added to the case.

However, at an anecdotal level it is clear that ANPR intelligence / evidence has played a key role in a significant proportion of recent high profile investigations, and in many of those cases, notably the murder of Sarah Everard, without the assistance of a comprehensive ANPR system it would have taken significantly longer to identify, apprehend and evidence the movements of the offenders.

In all of the above cases, the likelihood of achieving the operational objectives are to a large extent a product of the scale and appropriate focus of the ANPR camera network. The more cameras a vehicle hits the more opportunity there is to link it to a crime, identify a direction of travel and implement a successful intervention.

The loss of the TfL data from the MPS ANPR system would represent a reduction in the wider MPS ANPR capability. While there is no way to retrospectively review what value reads from TfL cameras specifically played in any investigation, given that they make up 75%+ of the network, it will inevitably be significant.

It is also important to note that the TfL ANPR cameras are disproportionately concentrated in central London in areas of high crime, high profile and high vulnerability to terrorism / public disorder. This only goes to amplify the strategic criticality of the TfL reads to the wider MPS capability.

- **Efficient and cost effective maintenance of the MPS ANPR infrastructure**

Much of the MPS ANPR camera infrastructure was fitted before the 2012 London Olympics and is therefore approaching the end of its usable life. During this period there is an inevitable falloff in mechanical reliability and performance which can be seen in daily reporting on the health of the MPS ANPR system.

Furthermore, developments in camera technology mean that even without age related degeneration new models are significantly more accurate and reliable than their predecessors.

As a result the MPS has an ongoing program for replacing its ANPR cameras which is both costly and resource intensive. Each new camera for example costs approximately £5000.

The opportunity to replace some of the end of service MPS cameras with brand new models therefore offers significant potential benefits in further enhancing the reliability and accuracy of the MPS ANPR system whilst saving limited MPS resources for other pressing needs.

- **The opportunity to efficiently and cost effectively enhance and develop the MPS ANPR Infrastructure in the future**

While the MPS has an established and proven ANPR camera network, it is not without gaps. As much of the camera network has been built by third parties the locations of ANPR cameras does not meet all of the MPS' operational needs. Some parts of London, for example where Local Authorities have not invested in ANPR, are not as well covered as others.

Furthermore, changes in traffic flows and patterns of offending / criminal behavior mean that the locations of cameras become more or less appropriate. Over recent years for example we have seen the unanticipated rise in prominence of drug supply channels between inner London, the Home Counties and rural areas beyond. For this reason the ANPR camera infrastructure remains under constant assessment and review.

The expanded TfL ULEZ incorporates approximately 800 additional camera sites. As the below image shows it also expands coverage into areas of inner and suburban London which were not touched by its predecessor.



These are areas with very little ANPR coverage but include some significant arterial routes. As such they potentially offer the opportunity to address some of the historic gaps in the MPS ANPR coverage and others which may emerge over time.

While there are no plans to take reads from any additional TfL cameras at present this project ensures that the necessary network integration work is completed to allow for such capability enhancement in the future. Where a suitable proportionality and necessity case is shown, this could provide the ability to further increase crime detections, act more swiftly and obtain supporting evidence in relation to criminal cases.

The sharing of TfL data with the MPS means that data from TfL cameras can be taken at negligible marginal cost. While this can in no way drive decision making it does remove a significant barrier to harnessing new data which is otherwise deemed proportionate and necessary.

While the pressure on public finances only increases it is incumbent on the MPS to consider any opportunity to collaborate with trusted third parties and, make the most efficient use of shared resources. It is clear that the expanded TfL network potentially offers opportunities for such future cost savings.

It is recognised that some have concerns about any potential expansion of the ANPR capability and its impact on privacy and wider civil liberties. These concerns are reflected within the NASPLE and Surveillance Camera Commissioner's requirements for justifying new ANPR infrastructure.

Any proposal to take reads from additional TfL cameras will be treated in the same way as new MPS infrastructure and reviewed through a process which is compliant with these requirements. A case setting out the operational proportionality and necessity will be presented alongside any data protection, privacy or equality considerations and ultimately signed off or rejected by the Commander Intelligence and Covert Policing (or an equivalent peer). Where the case is made out and reads taken, this DPIA and the parallel Equalities Impact Assessment will be updated accordingly.

### Overarching project purpose

The MPS use ANPR technology to prevent and detect crime by targeting criminals through their use of vehicles. The policing objectives associated with ANPR are:

- Increasing public confidence and reassurance
- Reducing crime and terrorism

- Increasing the number of offences detected
- Reducing road traffic casualties
- More efficient use of police resources.

This project aims to: secure the MPS ANPR capability by maintaining the current access to TfL ANPR data; increase the accuracy of the ANPR dataset by adding corroborating visual imagery and secure the opportunity to develop the MPS ANPR coverage in the future with reads from additional TfL cameras should it be deemed proportionate and necessary.

## STEP 2. Screening process for relevance to diversity and equality issues

### GUIDANCE

Each “protected characteristic” in Section 5 has guidance as to what implications / issues you may need to consider.

Does this proposal / policy have any relevance to:		Internal, relevant to staff / or working practices	External, relevant to service delivery	Not relevant to either
A	Age	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B	Deaf and disabled / Disability	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
C	Gender Reassignment	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
D	Marriage and Civil Partnership (employment only)	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
E	Pregnancy and Maternity	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
F	Race	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
G	Religion or Belief	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
H	Sex	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
I	Sexual Orientation	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
J	Other Issues	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

## STEP 3. If you have ticked yes to any protected characteristic box in Step 3, a full impact assessment is required.

### GUIDANCE

Full assessment required? (If Yes, a full EIA is required.) ☒ Yes ☐ No

## STEP 4. Examination of available information

### GUIDANCE

### Introduction

ANPR impacts significantly on the rights of all Londoners: drivers in London are captured 8-10 million times per day on the MPS and affiliated ANPR systems. The current TFL cameras alone deliver 6-8 million reads. Every one of these reads captures a small amount of data (location, vehicle number plate, date, time) but, when combined with other data, it can become a powerful tool in monitoring or evidencing the movements of drivers through London.

As already highlighted above, the changes outlined in this project will have limited impact on either the nature or the scale of public intrusion from the MPS ANPR system or how it is experienced by London's communities. There are no immediate plans to take data from the additional TFL cameras and therefore the impact on different locations or communities will remain unaffected. Any future decision to take reads from new cameras will be based on a comprehensive proportionality and necessity case that considers the impact on London's communities and is subject to a robust internal authorisation process.

The inclusion of heavily restricted imagery alongside the current TFL data will only enhance the accuracy of the system and reduce the possibility of errors leading to evasion or miscarriages of justice. Again, there is no reason to believe this

will have any disproportionate impact on any community.

## ANPR Data and Law Enforcement

The MPS holds ANPR data from its own camera network and from the camera networks of partners in local government and TfL.

ANPR data is used for law enforcement purposes in the prevention, detection and interception of criminal offences and protecting the public. It also has a vital part to play in supporting investigations, securing prosecutions and bringing offenders to justice. Access to the data is limited to a selected and vetted group of officers, who are trained to analyse the information. Their ability to interrogate stored ANPR data enables the MPS to intercept high-harm offenders and to solve both serious and localised crimes on a daily basis. It is also worth noting that the use of ANPR also reduces the risk of individuals being stopped or falsely accused of a crime as, when used within the guidelines, ANPR can eliminate innocent members of the public from enquires, not least when cloned number plates have been used in criminal activity.

ANPR data can also alert police officers to vehicles of interest (VOIs). Vehicles of interest fall into several categories, including those that have been involved in crime and have a marker placed on them on the Police National Computer (PNC), stolen vehicles, and vehicles held on managed lists that have been identified through intelligence as being worthy of police attention. VOI lists are also an intelligence tool; they are used to identify and inform policing of vehicles that are coming to note in relation to matters such as violence, gang activity, organised acquisitive crime and safeguarding issues.

The use of ANPR technology and data is managed in compliance with legislation and policy, including Part 3 of the Data Protection Act 2018 (DPA) and National ANPR Standards for Policing and Law Enforcement (NASPLE.) The MPS is compliant with the 12 principles of the Surveillance Camera Code of Practice and the Data Protection Act. Data is used fairly and lawfully to counter terrorism and support intelligence led pro-active and reactive policing operations and investigations. The MPS will always consider the potential for new ANPR deployments to have a disproportionate impact on particular communities, and an EIA will always be undertaken prior to any significant change to deployment or use.

The MPS network includes static and mobile cameras. The static MPS ANPR cameras are placed in areas of strategic importance in order to provide maximum impact in countering terrorism and fighting crime. The MPS also collaborates with local authorities and TfL, sharing ANPR camera estate to save money and minimise duplication. The MPS, Local Authorities and TfL carry out public consultations when utilising fixed ANPR camera sites. The MPS will only deploy additional ANPR cameras in line with an identifiable intelligence case, after considering wider issues of proportionality, community impact, legality and necessity.

It is important to note that the placement of TfL cameras is determined by traffic management and revenue consideration. The placement of the new cameras as part of the ULEZ expansion will be determined by TfL alone according to the practicalities of ULEZ enforcement. The equalities implications of this are considered by TfL in their own EIA. This EIA is concerned with the network reconfiguration required by the MPS to continue to take the current TfL data plus the additional related imagery.

## Scale

The MPS has no immediate plans to incorporate addition cameras from the ULEZ expansion into the ANPR network. Some of the additional camera locations may be incorporated in the future. However these additions will be subject to additional consideration of Community / Diversity impact once the locations are known.

The most immediate impact on the MPS ANPR network will be the improvement in the accuracy of the existing camera network through the inclusion of imagery. This will improve the MPS data capture and help to prevent misread number plates entering the ANPR database.

## Activation

This proposal is focused on reconfiguring the network connections with TfL ANPR system so that the MPS can retain its access to the established joint MPS / TfL ANPR network and immediately receive imagery necessary to corroborate the data from those cameras. It will also lay the foundations to allow for reads to be taken from the additional camera in the expanded ULEZ area should that be deemed necessary and proportionate in the future.

The MPS will not activate any cameras in the ULEX without an intelligence requirement. Any activation of cameras will be



justified by an intelligence case, and all data will be collected in accordance with legislation, Home Office National ANPR Standards for Policing and Law Enforcement (NASPLE)<sup>1</sup> and the National ANPR Technical Specifications<sup>2</sup>. There is a clear audit trail for all MPS ANPR usage.

The MPS' consolidation of the ULEX will be in three stages and the roll out plan is as follows:

#### Phase 1 (October-November 2021)

This phase integrates the network connections and allows imagery to be provided from TfL cameras. The key deliverables in this period are:

- Technical connections are put in place to take reads and imagery. Essentially, this phase switches on imagery for all established TfL cameras. These images are fully NASPLE-compliant, in line with all other ANPR-cameras, and the effect of the changes is to improve the accuracy of the ANPR data.
- A public consultation has been conducted, a DPIA completed and request for mayoral approval granted in relation to the principle of the MPS taking the imagery from current sites and, additionally, data and imagery from the new sites, once a proportionality and necessity case has been made.
- Consultation has showed strong public support for expanding MPS ANPR coverage. A significant survey in June/July 2021 showed overwhelming support for the use of ANPR cameras for law enforcement purposes in general, with 80% of respondents agreeing with police collaborating with partners such as TfL in sharing camera read data, and a similar number agreed to police having access to the new ULEZ network.<sup>3</sup>
- The final DPIA remains with the Data Office, awaiting sign off.

#### Phase 2 (October 2021 – early 2020)

This phase will see the improvement of the assets in place across the estate, and work to replace end-of-life MPS cameras where a new TFL camera can provide the same coverage.

Phase 2 potentially represents a limited expansion of coverage and raises some privacy issues, as the accuracy of our data from TFL will improve as the infrastructure is modernised. While there will be an improvement in the quality of the images generated it is important to note that the imagery will still be compliant with NASPLE and the National ANPR Technical Specifications

Home Office specifications state that the imagery received from ANPR should include a plate patch of the number plate only of 120x60 pixels and be no more than 3kB in size. There are also provisions for images showing the vehicle in the context of the read zone. This image must be in JPEG format, no more than 25kB in size. Where images obtained by a camera exceed 3kB for a plate patch or 25kB for an overview, these must be adjusted prior to forwarding to the National ANPR Service.<sup>4</sup>

As the quality of camera output is capped at a quality level determined by the Home Office, the upgrading of the TFL camera network will not lead to enhanced quality imagery being received by law enforcement through ANPR. There will therefore be little impact operationally and the cameras can be seen as like-for-like.

#### Phase 3 (Early 2022 – onwards)

Phase 3 represents the point at which the MPS will potentially increase operational capability through the ULEZ network.

The main points of delivery for phase 3 are:

- Strategic review of the entire London Camera Infrastructure to identify redundant sites and operational gaps.
- Site by site application for cameras to be added to MPS ANPR network, based on a case for proportionality, necessity and technical / privacy / equalities impact.
- Documents such as the EQIA / DPIA updated accordingly, and TFL add the reads to the MPS data feed.

At this point the MPS will assess operational need for the use of particular cameras using an intelligence-driven process,

<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/936912/NASPLE\\_Version\\_2.1\\_November\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936912/NASPLE_Version_2.1_November_2020.pdf)

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/988987/NAS\\_Technical\\_Specs\\_V3.1.1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/988987/NAS_Technical_Specs_V3.1.1.pdf)

<sup>3</sup> London Specific ANPR survey to cover sharing of data from TFL and wider ANPR use. In total 2537 people completed the survey, 93% of whom are drivers using London roads.

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/988987/NAS\\_Technical\\_Specs\\_V3.1.1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/988987/NAS_Technical_Specs_V3.1.1.pdf)



with full justification and clear governance, including equality impact assessments – it is impossible to conduct meaningful EIAs now, as the circumstances and any future deployment or activation cannot be accurately predicted in advance. Any use of the system will be based on principles of proportionality and necessity.

There are robust rules in place that govern how police manage ANPR data and sufficient safeguards in relation to TfL data, which allow it to be accessed under the same rules and conditions that already apply to police data. The intelligence picture for serious crime and terrorism is always changing, and accurate predictions cannot be made at this time for the operational deployments within the ULEZ network in 2022. The MPS recognises that any significant increase in the ANPR camera network would need to be fully justified in terms of proportionality and necessity, and therefore any future decision to take data from these cameras will be subject to a robust internal review and authorisation process which fully complies with the requirements of the SCC principles and NASPLE. This will include EIAs reflecting the particular circumstances of any potential deployment.

Note that public consultations about the MPS use of TfL data show a high level of support for police access to TfL data and images, and there is no reason to believe that this will not continue to be the case in the future if and when data from any additional cameras is added.

### Equality Implications

The variation of demographics and crime types across the boroughs of London is likely to result in a disproportionate number of ANPR returns for demographic groups when ANPR reads are taken from different areas. For example, inner London boroughs are home to a significantly higher proportions of BAME communities than the national average, and the demographic profile of inner London boroughs tends to be younger than the rest of London or the UK as a whole.<sup>5</sup> Camera reads taken from Lambeth, for example, are therefore likely to flag more young men from BAME communities than their proportion of the UK population as a whole might suggest. It is important to note that these communities are also most likely to be the victims of serious crimes.

- The majority of individuals connected to ANPR-flagged vehicles in relation to violence, firearms, HKC and gangs are those aged under 25. In relation to all other crime types there is a large age cross range (sex offenders/ acquisitive crime)
- BAME people are disproportionately victims of violence in London. This disproportionality increases as the severity of the violence increases. Police data and Accident and Emergency data indicates that young, African Caribbean men are disproportionately represented as offenders and victims of serious violence.<sup>6</sup> ANPR vehicle of interest lists for violence are reflective of this, however all other ANPR lists (safeguarding/ sex offenders and acquisitive crime have a large age cross section. As the 2021 Independent Report on Crime and Policing noted: “Ethnic minority people, and specifically Black people, are disproportionately victims of violent crime and homicide; for every White victim of homicide aged 16 to 24 in 2018/19, there were 24 Black victims.”<sup>7</sup>
- Males are disproportionately represented on vehicle of interest lists. A large proportion of vehicles attributed to violence, sex offending and acquisitive crime are owned or in the control of males.

A full appraisal of the equality impact of the MPS potential using data from any new ULEZ cameras cannot be considered until Phase 3 of ULEX and the MPS camera infrastructure review are complete. The activation of particular cameras for MPS purposes will be driven by intelligence pertinent at the time, and new deployments will undergo appraisals which will include EIAs.

A national IAG has been convened in relation to ANPR, and survey work has been carried out in relation to ANPR generally. Consultation has shown strong public support for expanding MPS ANPR coverage, and 82% support for the MPS adding the new ULEZ cameras (see consultation log below.)

It has not been deemed proportionate or necessary to convene further IAGs for specific communities in relation to ANPR use of ULEX. The ULEZ cameras will be positioned according to TfL revenue and enforcement criteria. The traffic flow past these cameras will largely reflect the demographics of inner London. Furthermore, at this stage we cannot predict

<sup>5</sup> <https://webarchive.nationalarchives.gov.uk/ukgwa/20160108131319/http://www.ons.gov.uk/ons/rel/census/2011-census/key-statistics-for-local-authorities-in-england-and-wales/rft-table-ks201ew.xls>

<sup>6</sup> See Tracking Violent Crime with Ambulance Data: How Much Crime Goes Uncounted? Via <https://link.springer.com/article/10.1007/s41887-021-00064-5>

<sup>7</sup> Kumar, S. et al., (2020), ‘Racial Disparities in Homicide Victimisation Rates’, Accessed January 2021. Available at: <https://link.springer.com/article/10.1007/s41887-020-00055-y> via <https://www.gov.uk/government/publications/the-report-of-the-commission-on-race-and-ethnic-disparities/crime-and-policing#fn:1>

**NOT PROTECTIVELY MARKED**

which cameras in which geographical areas will be activated (if any) - this will be determined by the crime picture and multiple other factors at the time.

The MPS ANPR team meets regularly with Local Authorities in relation to shifting crime problems and strategies. Efforts will be made to determine local community attitudes to crime fighting with particular emphasis on the use of ANPR. Local authorities and other policing partners will be encouraged to put questions of ANPR usage to local IAGs and to feed back any significant community sentiments. If strong feelings are identified, Community Impact Assessments and outreach work will be considered.

If there is anything you are unsure of in this first section you can contact the [Strategic Inclusion and Diversity Unit](#) for further information and advice.

## STEP 5. Full Impact Assessment Process

STEP 5a. Consultation Log			GUIDANCE
Where are the consultation records stored? (e.g. General Registry, S-Drives etc)			
Consultation records are stored on the Shared Drive at the file path: Privacy Impact Assessments for operational camera deployment			
Name of Business Group / Unit, Association, Stakeholder (External)	Why are you approaching / not approaching them?	Date and method of planned consultation	Outcome of consultation
28 <sup>th</sup> May 2020	ANPR IAG meeting – Chaired by the Surveillance Camera Commissioner (SCC).  A wide group, drawn from various communities, chaired by the SCC.	Various – public, regulators, Government Bodies	Various recommendations to ensure that the taking of additional TFL data was based on proportionality and necessity rather than opportunity and cost.  This has led to significant changes in the project plans and the incorporation of an additional governance layer before any further cameras are added to the existing infrastructure.
Feb 2021	National ANPR survey	Public	The National ANPR Survey showed an overwhelming public support for the use of ANPR for policing. This consultation covered the UK and had a 91% public support for the use of ANPR.
04/06 – 21/07/2021	London Specific ANPR survey to cover sharing of data from TFL and wider ANPR use	Public	In total 2537 people completed the survey, 93% of whom are drivers using London roads. There was overwhelming support for the use of ANPR cameras for law enforcement purposes in general (84% of respondents) with over 90% agreeing for their use in dealing with Counter Terrorism and reducing Crime. 80% of respondents agreed with policing collaborating with partners such as TfL in sharing camera read data, and a similar number agreed to policing having access to the new ULEZ network.

20/07/21	ANPR IAG – Chaired by SCC	Various – public, regulators, Government Bodies	<p>The revised plan for immediate reconfiguration of the network connections to allow for imagery to be taken, followed by a strategic review and potential future incorporation of images and reads from the new ULEZ cameras was presented to the members who were largely appreciative of the change of approach.</p> <p>2 concerns were raised by members of the group.</p> <p><b>It was suggested that the MPS could still end up with a 'ring of steal' and therefore should assess / consult on that basis.</b></p> <p>The MPS provided further reassurance that this was not the intention and that due consideration would be given to every incremental increase in ANPR infrastructure. All such decision making will be in line with National ANPR standards and SCC's Principles.</p> <p><b>Given the potential scale of the increase if the MPS do ultimately take all the reads, it was suggested that it should still consider wider political consultation.</b></p> <p>This suggestion has been considered on a number of occasions. However, it is the Mayor / MOPAC who ultimately give approval for the sharing of the TFL data. They are sighted on this document and other governance measures.</p> <p>As the political / elected body it is for them to address the issue of political consultation before giving their approval. They are also fully accountable through the London Assembly and the various assembly committees.</p> <p>It would not be appropriate for the MPS to bypass normal processes and enter the political debate. Policing has requirements as set out in the SCC principles / NASPLE which govern what they should do in these situations and they are being followed in this case.</p>
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**STEP 5b. EIA Action Plan**

From your consultation activities and available information explain within the appropriate Action Plan template the potential positive and / or negative impact of the proposal / policy, internally on members of your workforce and externally on your communities / service delivery:

Age	GUIDANCE	Race	GUIDANCE
Deaf and disabled / Disability	GUIDANCE	Religion or Belief	GUIDANCE
Gender Reassignment	GUIDANCE	Sex	GUIDANCE
Marriage and Civil Partnership (employment only)	GUIDANCE	Sexual Orientation	GUIDANCE
Pregnancy and Maternity	GUIDANCE	Other Issues	GUIDANCE

**STEP 5c. Action Plan Template Workforce Impacts (Internal)****GUIDANCE**

Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring
Age/ sex  Younger people and males are likely to be impacted by Vehicle of Interest lists as these lists are determined by criminal intelligence, and younger people and males are statistically more likely to be involved in crime	ANPR is used by law enforcement to tackle crime and to keep the public safe. As younger people and males are statistically more likely to be involved in criminal activity, they are more likely to be impacted by enforcement activity driven by ANPR.  Any vehicles on VOI lists will be added following criminal intelligence, and a proportionality and necessity test.	Met Intelligence	Ongoing review	
Race	Any vehicles on VOI lists will be added following criminal intelligence, and a	Met Intelligence	Ongoing Review	

**NOT PROTECTIVELY MARKED**

Demographics change across London, and activity in a particular area is likely to disproportionately impact any resident communities with a disproportionate population in the area.	proportionality and necessity test. If ANPR is driving crime-fighting in a given area at a given time, it will be due to a perceived policing need that will usually be designed to protect that community from serious crime.			
Vehicle of interest lists have been used in the MPS for a number of years. Since the inception technical advances in vehicles and software have provided greater opportunity for policing to prevent, detect and deter offending	Vehicle of interest lists are reviewed every 28 days to ensure that they are current following a review of CRIMINT and PNC	Met Intelligence	Ongoing Review Process	
There is no corporate training regarding the compilation of vehicle of interest lists. It is carried out by Intelligence professionals in the Central ANPR Team. Training is passed from officer to officer	Co-location of ANPR professionals to Local Intelligence Teams will enhance knowledge across the MPS. Training will initially be through local Basic Command Unit (BCU) Single point of Contacts (SPOCs) at Detective Inspector (DI) rank/ Intel Managers. Generic ANPR and data handling training is provided to all staff accessing ANPR. This clearly sets out the relevant legislation, guidance and policy.	Met Intelligence	Ongoing yearly reviews	
A dedicated group of officers and staff in the MPS have access to vehicle of interest lists	This will continue	Met Intelligence	Ongoing yearly reviews	

<b>STEP 5d. EIA Action Plan Template Service Delivery Impacts (External)</b>				<b>GUIDANCE</b>
Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring
Age – A large proportion of individuals within the violence/ firearms/HKC and Gang hotlists are young people under 25.	<p>This is intelligence led justified by information in relation to individuals coming to the notice of policing.</p> <p>ANPR is used by law enforcement to tackle crime and to keep the public safe. As younger people and males are statistically</p>	Met Police	Ongoing yearly reviews	

**NOT PROTECTIVELY MARKED**

	<p>more likely to be involved in criminal activity, they are more likely to be impacted by enforcement activity driven by ANPR.</p> <p>Any vehicles on VOI lists will be added following criminal intelligence, and a proportionality and necessity test.</p>			
Age – Young people are particularly known to be impacted by gangs via being recruitment into gangs or exploited for criminal gains by gangs.	Work with external partners, including external LEA's and LA's to explore greater opportunities to remove and protect young adults from gangs and exploitation	Met Police	Ongoing yearly reviews	
Age – Young people's involvement in gangs must not prevent the police and partners undertaking necessary enforcement against those participating in criminality and particularly violence with the police having a duty of care towards victims, and potential victims, of crime.	Ensure that officers and staff are able to utilise criminal justice measures in order to protect the public and bring those involved in crime and in particular violence to justice.	Met Police	Ongoing yearly reviews	
Race – the vehicle of interest lists at times may contain a disproportionate number of BAME subjects when compared with the population of London, depending on intelligence picture	<p>A number of violent crime types also show a disproportionate number of BAME individuals being both victim and suspects. These include</p> <p>Knife Injury Victim under 25 excluding Domestic Abuse for the 12 month period Nov17 - Oct18 - 67% of victims are BAME and 69% of offenders proceeded against are BAME.</p> <p>Lethal Barrelled firearm discharges for the 12 month period Nov17 - Oct18 - 75% of Victims are BAME and 86% of offenders proceeded against are BAME.</p>	Met Intelligence – Detective Chief Superintendent (DCS)	Ongoing monthly reviews	
Sex – Males represent a much higher proportion of subjects on VOI lists	This is justified by statistics that show a small number of females are victims and suspects of violent crime such as knife crime. There are also intelligence gaps on female's involvement in gangs.	BCU Detective Superintendent - Safeguarding	Ongoing yearly reviews	
Age / Race / Sex –Individuals on vehicle of interest lists are more likely to be offered	Individuals on VOI lists may be discussed at local partnership meetings where police and	BCU Detective Superintendent	Ongoing yearly	Local partnership meetings



**NOT PROTECTIVELY MARKED**

interventions and support from police and partners as they are already embedded in the Criminal Justice System	partners will consider a number of interventions to support these individuals and their families to move away from gangs.	t - lead for safeguarding	reviews	
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**STEP 6. Ensure monitoring and review arrangements are put in place****GUIDANCE**

How will the implementation of the proposal / policy be monitored and by whom?

Met Intel has governance structure relating to the maintenance of hotlists. The lists themselves are reviewed at set intervals and weeded where necessary and appropriate in line with current intelligence

**All Public Authorities such as the Metropolitan Police Service (MPS) have to comply with section 149 of the Equality Act 2010 more commonly known as the General Duty.**

**The Duty requires us to:**

- **Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.**
- **Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.**
- **Foster good relations between people who share a relevant protected characteristic and those who do not share it.**

**One of the ways we can demonstrate that we are complying with the General Duty is to document how decisions are reached and resulting activities including monitoring and review arrangements. In the MPS, the way we evidence this is by completing EIAs.**

What is the timetable for monitoring, with dates?

ANPR in law enforcement is highly regulated, with clear audit responsibilities incumbent on the police, under the oversight of the ICO and SCC. The MPS regularly reviews and appraises VOI lists, taskings and deployment activities. A key aspect of all ANPR deployment relates to continuing proportionality and necessity assessments, which generally need to address national security, public protection and the prevention and investigation of crime.

The MPS ANPR team meets regularly with Local Authorities and BCU colleagues to discuss shifting crime problems and strategic planning. Efforts will be made to determine local community attitudes to crime fighting, with particular emphasis on the use of ANPR. Local authorities and other policing partners will be encouraged to put questions of ANPR usage to local IAGS, and to feed back any significant community sentiments. If strong feelings are identified, Community Impact Assessments and outreach work will be considered.

MPS ANPR has a close link to the SO15 Strategic Engagement Team (SO15 SET). While SO15 SET is part of the Counter Terrorism Command, SET are also the MPS unit responsible for gauging community tensions in all communities, in all areas of London. SO15 SET have agreed to notify the MPS ANPR team of any developing concerns from any community. If such concerns are identified, MPS ANPR will endeavour to explore why through a directed Community Impact Assessment process and through outreach work, all with a view to a reappraisal of the EIA.

**STEP 7. Public availability of reports / result. What are the arrangements of publishing, where and by whom?****GUIDANCE**

This document will be available on the MPS publication scheme website and is also available for subject access and Freedom of Information Access Requests which regularly come into the MPS.

The MPS Department of Media and Communications have been consulted and this document will be made available on the MPS website.