



Automatic Number Plate Recognition (ANPR) Enabled Electronic Signs

Code of Practice

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Economic Growth & Development Directorate

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1. Introduction

This document aims to provide clarity on Cornwall Council's use of Automatic Number Plate Recognition (ANPR) Enabled Electronic Signs. This code of practice is aligned to the core principles of strategic documents produced from organisations such as the National Police Chiefs Council (NPCC), the Information Commissioners Office (ICO) and the Home Office, despite no ANPR or personal data being retained/shared.

2. Who Are We?

The Integrated Transport, Parking & Technology Team of Cornwall Council is responsible for the management and maintenance of numerous core assets across the county including the road network throughout Cornwall (excluding the A30 and A38).

This document specifically relates to the operation and management of the ANPR Enabled Electronic Sign infrastructure. Separate codes of practices are available for Cornwall Council Highway ANPR and Highway CCTV which differ in management and operation to this application.

3. What is an ANPR Enabled Electronic Sign?

ANPR refers to Automatic Number Plate Recognition cameras/systems capable of reading vehicle registration marks (VRMs). The technology has been integrated with a Vehicle Activated/Variable Message Sign to display the approaching Vehicle Registration Mark (VRM) on a speed sign adjacent to the highway along with a preconfigured message (for exceeding or below the speed threshold/limit).

No ANPR or personal data is stored or shared. The signs are used as a tool to manage driver behaviour on the local road network with the aim of reducing speed, improving road safety and reducing killed or seriously injured (KSI) incidents.

4. Intention and Use of Cornwall Council ANPR Enabled Electronic Signs

The purpose of this type of sign is to:

- convey to the driver of the detected vehicle whether they are compliant with the speed limit or not
- assist in reducing driving speeds both in the immediate vicinity and the wider area
- assist in improving driver behaviour
- improve road safety
- support compliance monitoring/reporting for Cornwall Council initiatives

These purposes listed are in no way exhaustive and Cornwall Council reserves the right to amend/update the list accordingly at any time.

5. Cornwall Council ANPR Guiding Principles

Although no ANPR or personal data is stored by the ANPR enabled electronic sign infrastructure, Cornwall Council will maintain and operate ANPR infrastructure in line with the 12 guiding principles as defined within the Home Office, "Surveillance Camera Code of Practice" document, June 2013, which are as follows:

- 5.1 Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
- 5.2 The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
- 5.3 There must be as much transparency in the use of a surveillance camera system as possible including a published contact point for access to information and complaints.
- 5.4 There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
- 5.5 Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
- 5.6 No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purpose has been discharged.
- 5.7 Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place where it is necessary for such a purpose or for law enforcement purposes.
- 5.8 Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
- 5.9 Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
- 5.10 There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
- 5.11 When the use of surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.

- 5.12 Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

6. Public Awareness

Cornwall Council is the data controller for Cornwall Council roadside ANPR enabled electronic signs. We will where possible display signage relating to the collection, use, storage and sharing of data (or otherwise), as part of operating the ANPR enabled electronic sign infrastructure. Exceptions will apply for sites where the positioning of a sign would cause a hazard, e.g. alongside a busy road where reading the sign would cause the driver to be distracted.

A privacy notice will be made available on the Cornwall Council website which will provide:

- Information on the ANPR enabled electronic sign infrastructure (where Cornwall Council is the data controller), including those sites mentioned above where signage is not appropriate or possible (incl. locations).
- Information on type of data collected, how data will be processed and/or retained and where the individual can contact with enquiries relating to the ANPR enabled electronic sign infrastructure.

7. Use of ANPR Enabled Electronic Sign Data

- ANPR data is solely used for display on the roadside electronic sign based on the speed the passing vehicle. A preconfigured message will be displayed based on whether the vehicle is above or below the speed limit of the road.
- No ANPR or personal data is stored or shared.
- Anonymised vehicle count, speed, date and time data are retained by Cornwall Council and shared with third parties for the purpose of completing statutory returns, informing highway safety schemes etc.
- No direct enforcement will result from this system.

8. Data Security

- No ANPR or personal data is captured, stored or shared. ANPR derived VRM information is solely used for display on the electronic sign at the time of capture.
- Anonymised vehicle count, speed, date and time data is retained and transferred from the ANPR Enabled Electronic Sign to the Back Office Facility via either fixed or mobile communication channels.
- Data retention periods can be found in Section 9 of this document.

9. Data Retention Periods

Organisation	Data Type	Maximum Retention Period
Cornwall Council	ANPR/VRM data	Not retained
	Anonymous vehicle count, speed, date and time data	5 years

10. Data Access

Role	Organisation	Team/Position	Reason
Data Controller	Cornwall Council	Head of Integrated Public Transport, Parking & Technologies	Service Manager responsibility.
Data Admin	Equipment Supplier	Engineer	System installation, maintenance and repair
	SSE Enterprise	Operations Team	System installation, maintenance, repair and daily defect monitoring
	Cornwall Council	Highway Technology Manager	Integrated Technologies Contract Management
		Technology Systems Engineer	System installation, maintenance and repair
		Contract, Technology & Asset Systems Team	System support, data audits
		Information Services	System installation, maintenance and Repair
	Cormac Solutions Ltd (on behalf of CC)	Transport Planning/Design Engineers	Review anonymised vehicle count and speed data for highway and network design/improvements
UTMC System Provider	Engineer	System development, support, maintenance and repair	

- Data access permissions may deviate from those listed above where Cornwall Council is required by policy or law to fulfil or disclose information. Amendments to data access policies shall be formally requested and sent to the Data controller for approval prior to any system access amendments.
- Authorised users will have a unique password protected log-in.
- Where Cornwall Council is the data controller, they or their representative may restrict access to data held on their system, taking into account any organisational needs and the efficient operation of their systems.

11. Sharing Information

- No ANPR or personal data is captured, stored or shared.

- Anonymised vehicle count, speed, date and time data will only be shared with parties and for the purposes listed in the section 10.
- Data will only be shared with these partners where sufficient agreements detailing the use, storage, security and retention of information by that partner is in place.
- Data will not be sold, shared or distributed for marketing purposes.
- Data will not be transferred or stored outside of the United Kingdom

12. Data Controller

Cornwall Council is the data controller for Cornwall Council ANPR enabled electronic signs.

13. Other Sources of Information

- Devon & Cornwall Police Automatic Number Plate Recognition (ANPR)
<https://www.devon-cornwall.police.uk/news/behind-the-blue-line/technology-pilots/automatic-number-plate-recognition-anpr/>
- What Methods Can We Use to Provide Privacy Information?, Information Commissioner's Office (ICO)
<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/the-right-to-be-informed/what-methods-can-we-use-to-provide-privacy-information/>
- Home Office – Surveillance Camera Code of Practice, Crown Copyright, 2013
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/204775/Surveillance_Camera_Code_of_Practice_WEB.pdf

14. Requesting Further Information

If you require further information, you can request it:

- Online by completing a feedback form:
<http://www.cornwall.gov.uk/default.aspx?page=1811>
- In person by calling into our one stop shops and many of our offices during working hours.
- By telephone:
0300 1234 100
- By email:
comments@cornwall.gov.uk

- By post:

Compliments, Comments and Complaints
Cornwall Council
County Hall
Treyew Road
Truro
TR1 3AY

15. Freedom of Information

If you wish to find out more about what information and/or personal data Cornwall Council retains, you can complete a Subject Access Request Form available from our Data Protection Act compliance webpage:

<http://www.cornwall.gov.uk/default.aspx?page=230>

16. Document Review

This document shall be reviewed on an annual basis by the Contract & Asset Systems team.

If you would like this information in another format please contact:

Cornwall Council
County Hall
Treyew Road
Truro
TR1 3AY

Telephone: 0300 1234 100

Email: enquiries@cornwall.gov.uk

www.cornwall.gov.uk