

National Strategic Automatic Number Plate Recognition Platform (NSAP) programme 2023

Background and Context

ANPR (Automatic Number Plate Recognition) technology is used by Law Enforcement (LE) at a local, force, regional and national level. ANPR helps detect, deter and disrupt criminal activity including travelling criminals (those using the road network to avoid being caught), organised crime groups and terrorists. ANPR provides lines of enquiry and evidence in the investigation of crime and is used by Police forces and authorised Law Enforcement Agencies (LEAs) throughout England, Wales, Scotland and Northern Ireland.

The NSAP Programme was commissioned to deliver a solution that provides the opportunity to enable, optimise and, if desired, transform the national ANPR capability, meeting the LE community's strategic objectives. It will do this through a variety of means including reducing duplication of datasets, modernising the data architecture, improving connectivity to the national dataset and enhancing data management. The main objectives of the programme are to:

- Provide a cost-effective, performant and scalable national ANPR capability to ensure efficient, and effective use of ANPR by police and LE to meet their law enforcement responsibilities and to protect the public.
- Extend proportionate and standardised access to the national ANPR dataset to allow exploitation of ANPR data for investigation and intelligence purposes.
- Enable better data management and transparency in accordance with the National ANPR Standards for Policing and Law Enforcement (NASPLE), including improved auditability in compliance with data protection legislation.

These objectives align with the objectives of our stakeholders as guided by the National Police Chief Council's (NPCC) ANPR Portfolio who are further supported by the National Police Technology Council (NPTC) and the Association of Police and Crime Commissioners (APCC)

Project Stage

The business case is currently at the Outline Business Case (OBC) stage. The OBC seeking approval for FY2024/25 was approved in March 2024 at Investment Committee and its purpose is to:

- Confirm the agreed delivery option to meet the strategic approach as per the Strategic Outline Business Case (SOBC) that was approved by the Public Safety Group (PSG) Commissioning Board (CB) in July 2023 and by the Home Office Investment Committee (InvestCo) on 21 September 2023.
- Confirm that the delivery option that was previously agreed optimises value for money.
- Provide an update on preparations for procurement.
- Agree the necessary funding and management arrangements for the successful delivery of the scheme during the FY 24/25

The business case has been submitted for approval to HMT with continued monitoring of this Programme and delivery of the agreed key milestones in line with governance requirements for all Government Major Projects Portfolio (GMPP) programmes.

A phased delivery approach was agreed with the rationale to incorporate lessons learned from the National ANPR Service (NAS) programme, and to allow for better review, assessment and control of delivery timelines and spend. The Project is currently in Phase 1.

Phase 1

- Deliver a replacement live data feed from the National ANPR Data Centre (NADC) that provides the ANPR data to the dependent forces for their specialist operations.

This activity is scheduled to be completed before **March 2025**.

- Build the new Data Store and utilise a new utility to populate it with 12 months' worth of historic ANPR data that will enable us to replace the NADC.

The Data Store was built by **June 2024** and is currently being populated with the data which is scheduled to complete by **March 2025**.

Phase 2

- Build the replacement capability on the Data Store to allow NADC to close and enable APIs to extract and integrate data for force/LEA systems to conduct advanced analytics, locally. This will allow decommissioning of the NADC. It aligns with the force/LEA requirements to extract national data into their local analytical solutions.

This activity is in progress and scheduled to be completed by **March 2025**. The activity to decommission NADC is dependent on Business Change led by NPCC ANPR Portfolio to migrate users to the NSAP. This activity needs to be funded as part of this business case.

Phase 3

- Re-tender current National ANPR Service to address the expiry of the contract for the same within the commercial and legal framework. This phase needs to be initiated in parallel with Phase 2 including discovery to allow for sufficient time to complete Market Intelligence/Engagement and agree the Procurement Options.

Under the preferred option, and in line with the agreement reached at SOBC stage to de-couple it from the data store design and build, activities around early market engagement will begin in FY24/25 however the final procurement will not happen until **FY25/26**.

Phase 3 will include the re-tender activities for replacement of the existing National ANPR Service by **October 2027**. The detailed activities for the replacement will be defined following the outcome of the retender. The programme now has agreement to limit the retender to a user interface only thereby continuing to utilise the new Data store being built.

The programme has prepared a 10-year investment profile for the programme considering all options available and recommending a preferred one. The purpose of this is to allow for complete overview of the costs involved in the current and next financial years of all the expected changes.

The baseline

The NADC is a critical police legacy system that needs to be replaced as it nears the end of service to ensure policing maintain continuity of key operational capabilities. Due to this, a Do-nothing baseline has been disregarded from our analysis of the business options available.

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The Do-minimum option is the baseline given it is the lowest reasonable cost to keep NADC running until 2025. However, while this option meets the minimum requirements for operational service, it does not fully meet the required compliance standards. For this reason, the preferred option is to replace the NADC.

The anticipated Whole Life Cost (WLC) for the preferred option - accounting for inflation but excluding Optimism Bias (OB) - is **£306.44m** (£71.23m change; £235.21m BAU). That estimate comes with an OB of 100% for all years taking the total to **£552.51m**. OB for Option 0 is set at 36.89%; Option 1 at 27.71%; and Option 3 at 150%. The difference is mainly due to the different risks identified and ranked for each option and different levels of mitigation factors applied to those risks.

The Programme will refine OB reflecting subject matter expert opinion as more information about risk mitigation and increased certainty over financial details becomes clearer. This will be presented in the next iteration of the business case, as the Programme progresses towards the Full Business Case (FBC) stage.

Assessment against the Accounting Officer standards

Regularity

ANPR operates under a framework of legislation of general application, within the meaning of Section 58 of the Data Protection Act 2018 – the UK’s implementation of the General Data Protection Regulation (UKGDPR), and common law. The National Law Enforcement ANPR Capability (NAC) is subject to the Information Commissioner’s Office (ICO) regulatory provisions.

NSAP will maintain a robust audit capability to enable compliance checks aligned to operational and legislative requirements. It complies with the NASPLE standards, and a Data Protection Impact Assessment (DPIA) has been completed. The project does not require new or amended legislation to progress and therefore the programme conforms to the Regularity Accounting Officer standard. The programme continues to engage with the Home Office Data and Information Board as well as the ICO.

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Propriety

The NSAP supports the Department's objectives to protect the public and reduce crime.

NSAP delivery will

1. Allow for NADC decommissioning by providing equivalent API to local ANPR systems limited to those who are currently using NADC- thereby enabling continuity of service for mission-critical functionality for policing.
2. Allow for retendering the current National ANPR Service (NAS) limited to a user interface only, thereby continuing to utilise the new Data store being built.

The proposal supports a significant proportion of the Department's Priority outcomes. The legal risks around data collection and sharing have been previously identified and considered with Home Office Legal Advisers' advice and mitigated through the NASPLE, audit provisions and a regularly reviewed DPIA. The operational risks around accessing the data with the right permissions have been considered in detail and mitigations are approved by the Lead Controller, a Chief Constable in policing, as authorised within the terms of Joint Controller Arrangements. The ICO is kept informed about the development of NSAP and about any risks or issues as they are identified.

A key element of the propriety standard is whether any proposal is sustainable including whether sufficient public resources are available and are likely to continue to be available.

Planning is in progress to ensure that activities and costs of decommissioning the legacy system are fully understood.

The programme has robust control processes to ensure funds are being applied only to the extent and for the purposes authorised by Parliament and ensuring that it continues to meet and conform to HM Treasury's (HMT) Managing Public Money principles and rules.

The procurements will be undertaken in line with the principles set out in the commercial framework and standards (Sourcing Playbook (May 2021) and will continue to be approved by the Board, Cabinet Office and HMT.

I therefore consider the programme to align with the principles documented in HM Treasury's Managing Public Money (MPM) and to conform to the Propriety Accounting Officer standard.

Value for Money

This VfM assessment has been conducted in line with HM Treasury Green Book (2022) and National Audit Office guidance. It considers strategic objectives, business needs, cost-benefit analysis and risks.

It is judged that the preferred option to be delivered by the Programme meets strategic and business objectives as follows:

- The programme meets critical business (CNI) needs for public safety as it provides service continuity and enables decommission of NADC which is a legacy system with provision of a technologically modern one.
- The programme enables further APIs between the new 12-month National Data Store and local user organisation analytics and ANPR applications allowing for increased intelligence.
- The programme enables improvement in national data quality.
- The programme addresses 'technical debt' of hosting / infrastructure through investment in a modernised national ANPR data store.
- The programme enables a reduced CO₂ output of data centres through investment in cloud based modernised hosting of the 12-month data store.
- The programme meets critical business needs for public safety as it enables the re-tender of the current NAS solution (CNI) as its commercial arrangements come to an end soon and an efficiency cost-saving.

Cost-benefit analysis

The short-listed options were appraised against the baseline of Do-minimum, that is, renew current contracts 'as is' but means operating legacy technology. This may also put deliverability at risk.

The preferred option would decommission the NADC in March 2025 and tender for a modern, cyber secure and fit-for-purpose system to replace it. This includes transition time and sees a reduction in national ANPR service costs by 2027.

Cost

The cost of the baseline option is estimated to be £127.0 (present values, PV) over 10 years. The preferred option has a total cost of £497.5 million (PV) over 10 years. The NPSV relative to the baseline (RTB) is the relevant measure for value for money assessment. This is estimated to be -£370.5 million (PV) over 10 years. The NPSV RTB, is where the baseline cost is subtracted from the short-listed options cost, as there is no Do-nothing approach possible in this programme.

These costs include optimism bias to reflect the degree of uncertainty and risk in the programme. However, these figures are expected to improve as the programme matures and more robust data becomes available.

Benefits

Public protection outcome benefits accrue directly from NSAP, for example, targeted vehicle stops and intelligence led policing. The Programme is working with users to provide additional data to estimate monetised benefits in the future.

The value for money is considered against the strong non-monetised benefits and the assessment of cost of delivery against the baseline.

Risks

There are some risks associated with the Programme including data matching complexities due to the mix of local and national ANPR systems, delay in the closure of NADC, accrual of better programme intelligence and information leading to a reduction in OB and as mitigating actions crystallise, an increase in quantified risk analysis costs, however, these are estimated to be significantly less than the current level of OB. Sensitivity analysis provided a range of cost estimates and benefits on key areas of uncertainty but did not reveal any unexpected changes.

Conclusion

The Home Office Investment Committee were satisfied with the conclusions of the Economic Case, confirming that NSAP offered value for money.

On the above basis, I consider NSAP, based on the preferred option, conforms to the value for money standard.

Feasibility

The NSAP Programme is in a 5-year life cycle and is estimated to end by March 2028 ensuring that the deliverables as captured in the business case are met. The Programme is in its first phase of delivery. Having reviewed the plans and progress made so far, there is confidence on the feasibility and achievability of the programme. The risks to timely delivery have been captured with mitigating actions in place considering the scale and complexity of the deliverables, and wider change requirements. In addition, the programme is undertaking a technical discovery to further provide confidence within the Stakeholder community on the future state of the overall ANPR capability beyond 2027.

The Programme has established structured delivery controls, including a detailed delivery plan which is regularly monitored (with changes managed through formal change control processes). Proactive risk management is supported by a regularly updated risk log and a robust governance structure. The Programme follows good practice and adheres to all internal review and approval processes. There are several internal assurance and approvals boards in place for both the technical and

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financial governance with central oversight through the Home Office's Project and Portfolio Delivery (PPD) Directorate.

The Home Office undertook two Independent Infrastructure Projects Authority (IPA) Gateway Reviews one in September 2023 and the second assessment in February 2024. The Review team awarded the programme an Amber rating resulting in an overall positive delivery confidence assessment (DCA).

The Gateway Review team provided five recommendations that the Programme accepted and are progressing. The Review team were satisfied the Programme is well managed, is delivering functionality that meets business needs and can implement and manage the proposed solution.

The last OBC stage business case was approved by the Public Safety Group Commissioning Board and at the Home Office InvestCo in March 2024 where the Programme was classed as a GMPP Programme and subsequently reports progress on a quarterly basis to the IPA. The Programme is pending approval at HMT and all reporting is in place in the HMT reporting tool.

In my consideration of whether this Programme meets the Accounting Officer feasibility test, NSAP continues to forecast delivery within its agreed schedule, cost, and quality constraints, therefore I am satisfied that it meets the feasibility standard.

Conclusion

As the Accounting Officer for the Home Office, I considered this assessment of the NSAP Programme and approved it on **6 December 2024**.

I have prepared this document to set out the key points which informed my decision. If any of these factors change materially during the lifetime of this project, I undertake to prepare a revised version, setting out my assessment of them.

This document will be published on the government's website (GOV.UK). Copies will be deposited in the Library of the House of Commons, and sent to the Comptroller and Auditor General, Treasury Officer of Accounts and Chair of the Public Accounts Committee.



Matthew Rycroft

Permanent Secretary

6 December 2024