

# Zoë Garbett AM live facial recognition consultation response

## Key information

Publication type: Consultation

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### 1. Zoë Garbett AM live facial recognition consultation response

The Government is [consulting](#) the public on the use of live facial recognition (LFR) technology. [Zoë Garbett has submitted a response](#) to this consultation, you can use her response as a guide to help shape your response.

[Zoë Garbett consultation response](#)

## Response from the Deputy Mayor

Dear Zoë Garbett, AM

Thank you very much for your report ‘The unchecked expansion of Live Facial Recognition (LFR) Technology in London’ which highlights your concern that the use of LFR is being expanded in London without sufficient regulation, calling for the Metropolitan Police Service (MPS) to stop using the technology, and ensure that any deployments take place transparently and free from bias.

The Mayor and I are clear that the use of technology is vital in supporting the MPS’s work in tackling crime and helping to build a safer London for everyone. Even so, it is equally important that this technology is deployed proportionately, lawfully, and ethically, and the MPS is transparent about where, when and how it is used to retain the trust of all Londoners.

In relation to transparency, the MPS’s published [LFR policy](#) sets out the process for LFR deployment decision making and authorisation. Deployments records are published after each use showing location, alerts and arrests with an overview in the [Annual Report](#). In regard to mitigating bias, we are assured by the [National Physical](#)

[Laboratory](#)'s independent report, that at the face-match threshold used by the MPS, the technology does lead to statistically significant bias in relation to gender and race.

While the use of LFR is a decision undertaken solely by the MPS in line with its operational independence, we work collaboratively to ensure that the force uses all opportunities to prevent, disrupt and detect crime, while maintaining public confidence: it is a delicate balance. For this reason, we take our oversight role on the use LFR very seriously sitting as observers on the MPS's Facial Recognition Technology Board, offering support and posing critical challenge, and using the work of the independent [London Policing Ethics Panel](#) (LPEP), to inform oversight priorities. Overall, we are satisfied that the force's use of the technology includes adequate policy documentation, robust internal governance, and appropriate controls and measures.

Additionally your report 'recommendation 2' proposes that: 'The Mayor of London and the Deputy Mayor for Policing and Crime should call on the Government to introduce primary legislation governing with clear and strict controls on the use of Live Facial Recognition technology for the most serious and urgent crime purposes, and a ban on other uses by the private sector or public authorities.

In response to this I wanted to let you know that MOPAC has submitted feedback to the Home Office's consultation on the use of facial recognition technologies. This was informed by advice from the London Policing Ethics Panel. In our submission, we welcomed the Government's proposals for a new legal framework and new regulatory body, in order balance crime fighting and community safety with public concerns about privacy and other rights. We also invited the Government to establish an agreed 'serious harm' threshold for the use of 'intrusive tools'. Additionally, we proposed the establishment of national quality standards with approved methods for testing reliability, validity and bias; a clear definition of in-scope technologies across all law enforcement uses; and robust authorisation procedures, including independent oversight and scrutiny.

Thank you very much for your interest in and challenge on this area of policing and for sharing your report.

Yours sincerely,

Kaya Comer-Schwartz  
Deputy Mayor for Policing and Crime

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