

Dame Cressida Dick QPM DBE
Commissioner of the Metropolitan Police Service
[By Email]

Dear Cressida,

Re: continuing serious concerns over the use of Live Facial Recognition (LFR) technology in London

As you are aware serious concerns remain regarding the continued operational use of LFR in London by the Metropolitan Police Service (MPS), with many of us expressing concern that the technology is unreliable, unregulated and being used in a way which infringes on the civil liberties of Londoners.

In a recent answer to a written question,¹ the Mayor made clear that in the first two deployments of LFR this year more than 13,000 faces were scanned.² Out of these 13,200 people scanned only six individuals were stopped. However, of those six, five were misidentified and incorrectly stopped by the police, not being wanted for any crime. Furthermore, of the total of eight people who created a 'system alert', seven were incorrectly identified. This is a concerning pattern of inaccuracy and misidentification of innocent people, which was also identified during the trials of this technology.

In addition to inaccuracy, we are also concerned that no laws, regulations or debate have been concluded consenting to the use of LFR by Parliament, and that therefore this technology has no national guidelines or regulations governing its use. Stopping Londoners or visitors to our city incorrectly, without democratic public consent and without clear justification erodes our civil liberties as well as our trust in the police, which has continued to decline in recent years. As I am sure you are aware, in June 2016, confidence in the police in London was at 69 per cent but by June 2019 it had fallen to 59 per cent.

We have found it a constant source of frustration to simply be told to refer back to the vast range of documents published by the Met surrounding the LFR roll-out.³ Despite reading these documents we can still see gaps and require further clarity. The documents do not address all the tests set out by the London Policing Ethics Panel (LPEP)⁴. In particular, the condition on necessity and proportionality from LPEP asked that only serious crimes were used to compile watchlists, but the MPS response is clear that police do not accept this condition.

¹ Police use of live facial recognition (6) MQ 2020/1034. Siân Berry, Mar 2020
<https://www.london.gov.uk/questions/2020/1034>

² A deployment on 20 February was abandoned on Oxford Street following a technical issue, so we are not considering this.

³ Metropolitan Police, Live Facial Recognition <https://www.met.police.uk/advice/advice-and-information/facial-recognition/live-facial-recognition/>

⁴ LPEP Final Report, May 2019. Page 48 "The view of Panel is that this condition is only likely to be met where LFR is used for policing more serious crimes" Met response, par 20, "the Bridges case makes it clear that the use of LFR should not be limited to serious crimes"

The decision to deploy LFR operationally, and then the practice observed during recent deployments after roll-out, raise a number of questions, and we would be grateful if you could provide answers to the following:


- We understand that each deployment has its own watchlist and that the parameters for compiling these may vary, but could you please clarify exactly which potential groups of people could be included on watchlists in addition to those wanted for serious crimes, terrorism offences and high-risk missing people? Does the MPS also maintain a list of types of offenders or suspects who should not be included in watchlists as guidance to officers and reassurance against mission creep?
- Can you provide a commitment that LFR will not be used operationally at protests, demonstrations, or public events like Notting Hill Carnival?
- The House of Commons Science and Technology Committee has called for a halt to the police's use of live facial recognition, until relevant regulations are in place.⁵ Do you feel comfortable ignoring Parliament?
- Can you confirm whether the Office of the Biometrics Commissioner, the Surveillance Camera Commissioner and the Information Commissioner's Office have each given the MPS their support for the operational roll-out of LFR in London?
- Do you believe that if this technology continues to be used in the way it is that it will improve public confidence in the police? If yes, please explain why you think this will be the case.

We both believe that the way in which LFR is being rolled out as an operational tool in London is ill-advised, and that this technology will have a chilling effect on civil liberties if it is not used with clarity, accountability and with full democratic consent.

We ask you to stop the use of LFR on Londoners until all these issues are addressed.

We look forward to receiving a response soon.

Yours sincerely,



Caroline Pidgeon MBE AM



Sian Berry AM

⁵ Issues with biometrics and forensics significant risk to effective functioning of the criminal justice system. Science and Technology Committee, Jul 2019
<https://www.parliament.uk/business/committees/committees-a-z/commons-select/science-and-technology-committee/news-parliament-2017/biometrics-commissioner-forensic-science-regulator-report-publication-17-19/>