| Police Scotland logo | Freedom of Information Response Our reference: FOI 25-0356  Responded to: 28 May 2025 |
| --- | --- |

Your recent request for information is replicated below, together with our response.

## This is a request under the Freedom of Information Act for information regarding your force’s use of Facial Recognition Technology, Retrospective Facial Recognition and the Police National Database (PND). Please provide the following information about your force’s use of Facial Recognition Technology, Retrospective Facial Recognition and the Police National Database (PND) for the periods between January 2024 and today’s date (27/01/2025); if you do not hold this information for the whole length of the period stated above, please provide it for the period starting from the date you began recording the information:

Police Scotland began using Facial Matching in April 2014 which is when the facility was introduced within PND.

In common with all other UK police forces, we use facial matching technology provided through the Police National Database (PND). The database is proven technology and an extremely useful tool in helping officers to identify those who commit crimes.

Police Scotland is not currently using or testing live facial recognition technology; however, we continue to monitor police use elsewhere via UK policing forums.  As announced at the Scottish Biometrics Conference in June 2024, we have committed to a wider conversation in respect of Live Facial Recognition, to establish/evidence its use is lawful, effective, proportionate, and ethical in a Scottish policing context to support keeping people safe.  Thereafter, any consideration for implementation would of course be subject to robust consultation and following Rights Based Pathway decision making.

## The processes (if any) undertaken by your force when using the Police National Database's face search capability to identify children (minors under the age of 18).

Unfortunately, I estimate that it would cost well in excess of the current FOI cost threshold of £600 to process your request. I am therefore refusing to provide the information sought in terms of section 12(1) of the Act - Excessive Cost of Compliance.

By way of explanation, Police Scotland hold 340 PND licences, split across multiple departments and divisions, all of which undertake their own PND research and facial recognition.

There is no nationally produced guidance document that provides direction when PND is utilised to identify children. As such, to identify local processes an assessment of documentation held by each department and division that uses PND would need to be undertaken to determine if any such guidance/process exists, this is an exercise that would greatly exceed the cost threshold set out within the Act.

## If there is a Child Rights Impact Assessment for the use of:

## a. The Police National Database (PND)

## b. Facial Recognition Technology

## c. Retrospective Facial Recognition Technology

The information sought is not held by Police Scotland and section 17 of the Act therefore applies.

By way of explanation, with respect to the points above, Police Scotland have not undertaken a Child Rights Impact Assessment.

## The number of times Facial Recognition Technology, Retrospective Facial Recognition Technology and/or the Police National Database were used to identify children (minors under the age of 18).

## The following information about each search:

## Date

## reason for search

## officer defined ethnicity

## self-defined ethnicity

## gender of the person searched

## age of person searched

## response (i.e., whether the search returned a record and led to an arrest)

Again, unfortunately, in response to questions to 3 and 4, I estimate that it would cost well in excess of the current FOI cost threshold of £600 to process your request. I am therefore refusing to provide the information sought in terms of section 12(1) of the Act - Excessive Cost of Compliance.

To identify any personal details, including age would require a manual assessment of each recorded search. This is an exercise that would exceed the cost threshold set out within the Act.

## Are CCTV images used during facial recognition checks which utilise the PND? If so, please share the number of times CCTV images were used for facial recognition checks

As above, I estimate that it would cost well in excess of the current FOI cost threshold of £600 to process your request. I am therefore refusing to provide the information sought in terms of section 12(1) of the Act - Excessive Cost of Compliance.

To identify the number of CCTV images used, if any, would require a manual assessment of each recorded search. This is an exercise that would exceed the cost threshold set out within the Act.

## Are CCTV images and footage retained on the Force Video management system, including those which depict children under the age of 16 and under the age of 18?

The information sought is not held by Police Scotland and section 17 of the Act therefore applies.

By way of explanation, Police Scotland do not have a “force video management system”.

## Are images or data from facial recognition searches (in particular of minors under the age of 18) shared with other agencies or private organisations? If so, under what conditions?

Images can be shared with essential partners where there is a policing purpose, and it is deemed relevant and necessary to do so.

## If your force does not currently use Facial Recognition Technology, retrospective Facial Recognition and/or the Police National Database (PND) please state if there are there plans to.

This question is non-applicable.

If you require any further assistance, please contact us quoting the reference above.

You can request a review of this response within the next 40 working days by [email](mailto:foi@scotland.police.uk) or by letter (Information Management - FOI, Police Scotland, Clyde Gateway, 2 French Street, Dalmarnock, G40 4EH). Requests must include the reason for your dissatisfaction.

If you remain dissatisfied following our review response, you can appeal to the Office of the Scottish Information Commissioner (OSIC) within 6 months - [online](https://www.foi.scot/appeal), by [email](mailto:enquiries@foi.scot) or by letter (OSIC, Kinburn Castle, Doubledykes Road, St Andrews, KY16 9DS).

Following an OSIC appeal, you can appeal to the Court of Session on a point of law only.

This response will be added to our [Disclosure Log](http://www.scotland.police.uk/access-to-information/freedom-of-information/disclosure-log) in seven days' time.

Every effort has been taken to ensure our response is as accessible as possible. If you require this response to be provided in an alternative format, please let us know.