



Discussion at: Joint Independent Ethics Committee (JIEC)

JIEC Date: 12 March 2025

Subject/ Dilemma: Facial Recognition

Report of: West Yorkshire Police

Presenter: Chief Inspector Dan Tillett

1. PURPOSE

- 1.1 To get independent advice and opinion from the Joint Independent Ethics Committee Members to inform and influence decision making.
- 1.2 For JIEC Members to highlight areas of focus for the Mayor, Deputy Mayor and Chief Constable to consider.

2. SUMMARY

- 2.1 In the UK, police use facial recognition technology in several ways:
 - 1. **Retrospective Facial Recognition (RFR):** This is used after an event to identify suspects by comparing images from sources like CCTV or social media against police databases^[1]. It helps in quickly identifying suspects and solving crimes.
 - 2. **Live Facial Recognition (LFR):** This involves real-time scanning of public spaces to identify individuals on watchlists. The technology alerts officers if a match is found, which is then manually verified (the “human in the loop”) before any action is taken^[2].
 - 3. **Operator Initiated Facial Recognition (OIFR):** OIFR is when a law enforcement officer uses facial recognition technology during an active investigation or encounter to identify a person. It typically involves taking a photo in the field and running it through a database to find potential matches.

A landmark case in the use of FR technology in UK policing was Bridges vs South Wales Police.

The recommendations following the Bridges vs South Wales Police highlighted the need for a clear legal framework, increased transparency, robust oversight, bias mitigation, and public consultation.

Last year, the NPCC lead for Facial Recognition presented to the House of Lords with many of the points raised in Bridges being revisited.

In West Yorkshire Police we currently only utilise RFR, however, we are part of a national project to acquire Live Facial Recognition capability later in the year AND we are working with the Home Office to deliver OIFR to the front line.

We have used the tools at our secure convictions, safeguard the vulnerable and prevent and deter criminal activity (particularly at planned disorder).

3. KEY QUESTIONS/ SPECIFIC AREAS OF FOCUS FOR THE COMMITTEE

- 3.1 Bias and fairness - What steps are being taken to mitigate bias in facial recognition algorithms, particularly concerning race, gender, and age? How do we ensure that the technology is applied fairly and does not disproportionately impact certain groups?
- 3.2 Public Trust - How do we engage with the public to build trust and address concerns about the use of facial recognition technology?
- 3.3 Transparency - how can we build transparency into the processes and criteria for management of watch lists.
- 3.4 Members discussed the topic at length. Discussion summary:
 - i. The use of facial recognition technology is significantly misunderstood. Without a proper communications plan, use has the potential to lead to a decrease in trust and confidence and further marginalise minority groups.
 - ii. The police should assume that the public believe they are being photographed and/or filmed and should develop a plain English communication strategy to myth bust this perception.
 - iii. Assurance needs to clear on any bias, human or technological. This assurance should be communicated to the public.
 - iv. The human element of the process is excellent, and this should be highlighted in the communications plan.
 - v. Defining facial recognition away from artificial intelligence is a key element and should also be highlighted.
 - vi. The grounds of use should be clear and delivered in plain English in a way which offers assurance to those subject to its use.
 - vii. Governance and accountability measures should be transparent and robust.
 - viii. At this stage, facial recognition technology should not be used for everyday policing. A phased implementation with use in specific circumstances will create opportunity for communities to come along on the journey.
 - ix. When training officers, the training dataset should be diverse to minimise biases.
 - x. Discussion was held about a persons right to consent, and current legislation does not require consent of filming and photography in public places but good communication is critical to building trust and confidence.

- xi. The security of facial recognition data should be treated and protected in the same way as other high-risk information held by the police.
- xii. Members support use of facial recognition with the caveat that an ongoing communications strategy is paramount to its success.

4. SUPPORTING DOCUMENTS

4.1 References

[Police use of Facial Recognition: Factsheet – Home Office in the media](#)
[Live facial recognition technology guidance published - College of Policing](#)
[R \(Bridges\) -v- CC South Wales ors Judgment - Courts and Tribunals ...](#)
[R \(Bridges\) -v- CC South Wales - Courts and Tribunals Judiciary](#)

committees.parliament.uk/publications/43080/documents/214371/default/

4.2 The Alliance for Citizen Engagement – Understanding the Debate

[Understanding The Debate On Facial Recognition Technology In Policing: Pros, Cons, And Privacy Concerns | ACE](#)

4.3 Big Brother Watch - 'Stop Facial Recognition'

[Stop Facial Recognition — Big Brother Watch](#)