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Overt Live Facial Recognition Policy

Classification	OFFICIAL
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Disclosable (FOI / Publication Scheme)	Yes

Contents

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Purpose of the Policy

This policy provides information on the use of Overt Live Facial Recognition; it is a requirement of the College of Policing that each Police Force has a suitably robust policy to enable the deployment of Live Facial Recognition (LFR) technology.

This policy:

- Provides British Transport Police (BTP) personnel with procedures on the deployment of Overt LFR technology in BTP locations accessible to the public and rail network employees.
- Establishes the governance structure for LFR Deployments ensuring that all and any LFR use is legally compliant and appropriately governed.
- Provides an overview of all forms of BTP's use of Overt LFR.

Further documents supplement the information in this policy, these include but are not limited to:

- LFR Equality Impact Assessment
- LFR Data Protection Impact Assessment
- LFR Legal Mandate
- LFR Deployment Results

Who does this policy apply to

This policy applies to Police Officers, Police Community Support Officers, Police Staff and Special Constables in B Division.

Principles

This policy is in place for the pilot deployment of Live Facial Recognition (LFR) that will take place within B-Division only.

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Procedure

1. Introduction

1.1. Processes in this policy are designed to ensure that British Transport Police (BTP) are compliant with legislation and relevant Information Sharing Agreements (ISAs) or similar.

1.2. Facial Recognition (FR) Technology has several potential applications within a law enforcement context. This policy relates only to the BTP Overt use of FR within a live setting.

1.2.1. The term "Overt" is used here to refer to the BTP use of Live Facial Recognition (LFR) in a manner that can readily be detected by those members of the public who may be affected by it, particularly using awareness raising measures outlined in Section 3.6.6 of this policy. This policy is not concerned with any possible use of FR authorised by way of the Regulation of Investigatory Powers Act 2000. All references to LFR below are intended accordingly to be references exclusively to the overt use of LFR by the BTP.

1.3. This policy covers the use of a BTP LFR capability and its operational deployment.

1.4. It does not extend to:

- Retrospective Facial Recognition and Officer Initiated Facial Recognition.
- The legal framework. This is covered by the Legal Mandate which also covers key amendments to LFR use following R (Bridges) v Chief Constable of South Wales Police.

2. Live Facial Recognition (LFR) overview and how it works

2.1. LFR is utilised by British Transport Police (BTP) as a crime fighting tactic to locate those people wanted by BTP/courts and bring them to justice, and those with conditions imposed on them by the police/courts to ensure their compliance.

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2.2. LFR helps us locate those on a watchlist by monitoring facial images of people within a zone of recognition. Images from cameras attached to the LFR system are searched against a watchlist of images of people who are wanted by the police or the courts or are suspected of posing a risk of harm to themselves or others. The watchlist composition is normally restricted to individuals suspected to be in the proximity of the deployment area and where there is some possibility or likelihood of an individual passing through the deployment zone whilst recognising the transient nature of criminal movements through railway transport hubs. Those 'sought' persons on a BTP 'watchlist' have already demonstrated offending on the rail network and use of train services, stations or rail infrastructure to facilitate that offending. The risk to vulnerable persons using train networks to self-harm can also be addressed through the use of LFR. ***At commencement of LFR pilot (Feb 2026) missing people will not be included in watchlists. This will be considered in future DPIA and EIA considerations***

2.3. LFR works by analysing key facial features to generate a mathematical representation of them. This representation is then compared against known faces in a database to identify possible matches against persons of interest to police. Where the LFR application identifies a possible match, the LFR system flags an Alert to a trained member of BTP personnel who then makes a decision as to whether any further action is required. In this way, the LFR application works to assist BTP personnel to make identifications rather than acting as an autonomous machine-based process devoid of user input. (There will always be a human being making the decision to engage with a potentially 'matched' face and determine the outcome of that match)

2.4. The following are illustrative examples where LFR may assist BTP with its policing purposes. Exact use cases vary and are outlined in section 3 of this policy:

- Supporting the location and arrest of people wanted for criminal offences.
    - *Example – Forensic evidence highlights a suspect as having their DNA linked to serious sexual assault taking place at a London railway station. The suspect is already known to the Police, and a custody image is held for this suspect. Initial enquiries to locate this suspect have failed and no other intelligence currently indicates his whereabouts other than a 'last known address' in Croydon. (Which falls in BTP's LFR pilot division | B-DIVISION) This suspect could be included on a watchlist of serious*

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offenders, wanted for questioning by the Police, at LFR deployments in B-DIVISION.

- Preventing people who may cause harm from entering an area with conditions preventing them from doing so (for example, under football banning orders).
    - *Example – An offender has received a football banning order preventing international travel to away fixtures. A custody image of the offender is available to BTP and can include on a watchlist at St Pancras International Railway Station before kick-off to identify if this offender is in breach of his banning order.*
- Supporting the identification of people about whom there is intelligence to suggest that they may pose a risk of harm to themselves or others (for example, stalkers, terrorists, missing persons, sex offenders, etc.). ***At commencement of LFR pilot (Feb 2026) missing people will not be included in watchlists. This will be considered in future DPIA and EIA considerations***
    - *Example – BTP have received intelligence that an individual subject to a Sexual Harm Prevention Order (SHPO) is currently travelling to a location in London whom is subject to an ancillary court order or wanted by the police, with the intent to commit a child sexual offence. Police may lawfully deploy Live Facial Recognition (LFR) in an intelligence-led operation to identify this nominal as they pass through the designated London transport hub.*
- Supporting the use of targeted preventative policing tactics in areas where intelligence suggests violent crime may be committed or there is otherwise a need to secure an area with a precise crime fighting tool to better deter those who may pose a threat from attending.
    - *Example – A major international technology expo is taking place, drawing high-profile industry leaders and showcasing newly released products. Several exhibition halls and VIP areas have been placed under 'protected security status' due to credible threats of disruption and potential violence from individuals opposed to the event's data-privacy practices. Watchlists have been compiled containing persons who have previously attempted to force entry at similar events or who have made explicit threats to target attendees.*

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2.5. Whilst appropriate use of LFR as a precision crime fighting tactic delivers clear value to BTP and the public in turn, it is important to recognise that the use of LFR involves biometric processing. BTP is conscious that the use of LFR has been the subject of much debate. Area's subject of particular debate and scrutiny relate to the intrusion into civil liberties and the instances of false-reporting relating to the accuracy of LFR, the potential for wide-scale monitoring through the use of LFR, and the possibility for automated decision making as a result of LFR processing. It is therefore incumbent on BTP to ensure that LFR is used lawfully and responsibly for legitimate policing purposes, and in a manner that is transparent. This will help ensure that public trust and confidence is not eroded by the use of LFR.

2.6. Each deployment must be carefully designed and have clearly documented objectives. The Live Facial Recognition Authorising Officer (LFRAO) must ensure that their assessment and authorisation clearly articulate legality, necessity and proportionality. This assessment must also include consideration of whether the objectives could be achieved by alternative means including 'traditional policing' enquiries or deployment, to whether LFR can be deployed for a shorter period of time, at a different location or utilising less LFR assets. Whilst considering proportionality, the LFRAO should outline the potential public benefits associated with the use of LFR and reflect on any concerns that members of the public *may raise* regarding the engagement of their human rights.

2.7. The LFRAO must also consider how the deployment of LFR may impact on communities and how the rights of everyone whose image is likely to be captured by the LFR application have been considered, and what safeguards are in place to protect communities.

2.8. The Gold Commander must also be satisfied that LFR Operators and LFR Engagement Officers involved with the deployment are appropriately trained, briefed, and accountable. Also, that equipment will be used correctly, and that those involved in the deployment mitigate against inappropriate responses to LFR Application Alerts.

2.9. BTP develops and implements precision policing tactics designed to protect the public effectively and actively monitors new tactics, such as LFR, to understand their impact. A robust governance process will support ongoing review of LFR deployment effectiveness, with a strong emphasis on transparency and sustained engagement with a broad range of stakeholders, including community representatives.

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3. Strategic Intention, Objectives and Use Case

3.1. Live Facial Recognition (LFR) deployments must be managed under a written authority that complies with the following strategic intentions and operational objectives.

3.2. Strategic Intentions

3.2.1. British Transport Police (BTP) will:

- Use overt LFR technology in a responsible way to locate offenders in accordance with BTP's common law policing powers and statutory powers. This includes targeting those wanted for criminal offences, those who pose a risk of harm, those subject to live court orders and those wanted by the courts.
- Comply with the common law and statutory safeguards in delivering its policing operational duties and relies on common law to discharge a number of its duties. LFR can assist with BTP's duties to protect life and property, preserve order and prevent threats to public security, prevent and detect crime, bring offenders to justice, and uphold national security. This includes targeting those wanted for offences. It also includes using LFR technology to protect the public, reduce crime and help safeguard vulnerable persons.
- Strengthen and develop LFR technology capability to protect the public, reduce serious crime, to help safeguard vulnerable persons, and to keep persons safe on the railway. ***At commencement of LFR pilot (Feb 2026) missing people will not be included in watchlists. This will be considered in future DPIA and EIA considerations***
- Build public trust and confidence in the development, management and use of LFR by taking account of privacy concerns and maximising transparency.
- Maintain good governance through a command structure that incorporates strategic, operational and technical leads for the deployment of LFR, with clear decision making and accountability.
- Ensure that the deployment of LFR is used in compliance with all applicable legal requirements, and that it meets the oversight and regulatory framework as presently outlined in England and Wales by the

Biometrics and Surveillance Camera Commissioner, the Information Commissioner and BTP LFR documents.

Update to Surveillance Camera Code of Practice - GOV.UK

Facial Recognition Technology (FRT) and surveillance | ICO

- Transparently identify, manage and mitigate organisational risks to uphold public trust and ensure confidence in ethical and accountable policing.
- Be recognised as a progressive, responsible and ethical organisation.

3.3. Operational Objectives

3.3.1. BTP will:

- Use LFR technology to enable BTP to discharge its common law policing powers. This includes the need to tackle our foremost operational priorities to ensure the safety of those using the railway network.
- Adopt a robust and proportionate approach in engaging and pursuing individuals identified on an LFR watchlist, using human decision-making. Officer oversight is active and involved, with the officer retaining full control and making the decision on whether to act.
- Engage with and provide reassurance to communities, listening and responding to concerns.
- Continually identify and review risks relevant to the LFR technology, mitigate those risks and maintain a response plan should mitigation fail.

3.4. Technology Objectives

3.4.1. BTP will:

- Ensure all LFR technology is fit-for-purpose and deployed effectively in line with strategic intentions and operational objectives.
- Provide ongoing technical oversight and evaluation into the effectiveness of the technology as a policing tactic to bear down on violent crime and other imprisonable offences.
- Look to technological improvements whilst keeping the LFR policy documents under review.

3.5. Use of Live Facial Recognition (LFR)

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3.5.1. This policy relates to the use of LFR in an overt capacity to help BTP protect the public. BTP will keep the use of LFR under review to ensure LFR continues to be used as an effective crime fighting tool.

3.5.2. LFR supports BTP in using its resources more efficiently by rapidly identifying individuals from a large dataset (typically ranging from several hundred to a few thousand entries). It links a possible match and provides contextual information to explain why the individual may be of interest to BTP.

3.5.3. LFR provides an alternative to methods like social media campaigns or sharing data with external organisations for wanted persons. However, data protection considerations should not be seen as a complete barrier to sharing information where it is necessary and lawful.

3.5.4. We will regularly review where LFR is used. LFR will only be deployed in locations where it can best support BTP's strategic priorities. Every decision to use LFR in a specific area will be backed by clear reasoning, explaining why that location was chosen. This will follow the principles set out in the legal mandate and other BTP documents related to LFR.

3.5.5. No action will be taken based only on an alert from the LFR system. A BTP officer or police staff must always be involved to assess the situation and decide on the most appropriate response. This decision will be based on the information available at the time and officer's interaction with the individual identified by the system.

3.5.6. The full process for deploying LFR is as follows:

- The deployment is authorised by an Authorising Officer (LFRAO) for law enforcement purposes, and a watchlist is selected.
- The LFRAO notifies relevant parties about the deployment, and signs are placed at the LFR location to inform the public.
- As people pass through the zone of recognition of the LFR camera, their faces are scanned. If the image quality is good enough, the system compares the face against the watchlist.
- If there is a possible match, the system generates an alert. It shows both the scanned image and the watchlist image to the LFR Operator or LFR Engagement Officer for review.

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- The LFR Operator or LFR Engagement Officer reviews the alert, taking into account system performance, environmental conditions, and their own training and experience. They decide whether to take further action and whether to engage with the individual. This decision is recorded using the LFR software.
- Once the deployment ends, the authorisation is cancelled and a post-deployment evaluation is carried out.

3.6. Use Cases

3.6.1. BTP will only deploy LFR in the context of the following use cases and alongside existing operations as a tactical option to enhance organisational effectiveness.

3.6.2. Proactive Deployments

- These are deployments based on information, intelligence and crime data for those areas, including increases in types of crime and persistence of crime occurring at significant volumes at a given location. These deployments will be focused around where LFR will provide the most benefit in discharging the operational duties of BTP and supporting existing operations aimed at preventing and detecting high harm offences. Any deployment should be to a location highlighted in the Level 1 tasking document that is agreed by the Tactical Tasking and Coordinating Group.

3.6.3. Specific Intelligence Deployment

- A specific intelligence deployment of LFR occurs when there is credible information indicating that a person of interest – such as a wanted offender, or high-risk individual– is likely to be present at a particular location within a defined timeframe. The deployment is targeted, time-limited, and proportionate to the policing objective, with the watchlist restricted to individuals directly relevant to the intelligence received.

3.6.4. Protective Security Operations (Event Deployments)

- Consistent with its policing purposes, BTP may conduct specific operations aimed at keeping the public safe and/or protecting property or national infrastructure, referred to in this policy as Protective Security Operations (PSOs). Under the terms of this policy, LFR may only be used to support the following type of PSO:

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- A PSO which has as its objective the protection of critical national infrastructure.
- A PSO undertaken by BTP in respect of events which are expected to attract public attendance and further where BTP has intelligence which indicates that there is likely to be a threat to public safety.

3.6.5. Key Points

- LFR captures images from people within the LFR Zone of Recognition.
- It is important to consider the selection and placement of cameras to make sure there is full coverage of the desired area.
- The quality and resolution of images – both from the watchlist and video cameras – are crucial. They must meet the minimum standards required by the LFR software, as set by the supplier. LFR system engineers will record the system's calibration before each deployment, during the deployment at regular intervals, and whenever any changes are made.
- The inclusion of individuals on a watchlist needs to be justified based on the principles of necessity and proportionality.
- The operations objectives should be balanced with the size of the watchlist and the resources available to respond to alerts. If the objectives are too broad or the watchlist is too big, it may take more resources than are available to manage the alerts.

3.6.6. Policing Live Facial Recognition (LFR) Deployments Effectively

- Enough trained staff must be available to respond to alerts. This helps make sure the LFR system and its data are used properly.
- The number of people in the LFR Zone of Recognition can affect the system's performance – a busier area may cause the system to miss more true matches (potential false negatives) or trigger more false alerts (incorrect matches), and it may slow down how quickly each face is processed. These factors should be weighed when determining how many officers and other resources to allocate for a deployment. A missed match (false negative) is when someone on the watchlist passes through the zone but the system does not alert on them – in other words, the system decided there was no match when in fact that person was on the watchlist.

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- It is important that BTP is transparent in its use of LFR under this policy. As well as using signage, the provision of sufficient policing resources will allow officers to answer any questions the public may have. BTP will also publish all appropriate LFR documents on its website fully accessible to the public. We are conscious that station wide announcements advising the public of LFR operations may give rise to apprehension the entire station is under surveillance or add confusion as to what area the defined zone of recognition covers. We will discuss on a location-by-location basis, with station operators, whether we can utilise public messaging systems to inform members of the public (especially our blind community) that an LFR deployment is underway. The LFR camera mast is highly visible in bright yellow.

4. Operational Deployment

4.1. Live Facial Recognition (LFR) specific roles

4.1.1. LFR Operator

- LFR Operators must attend training to use the LFR operating software. Training is provided externally by the operating system supplier. This course is mandatory and will be managed by Learning and Development. LFR Operators must be signed off as competent before using the live system. The role is to monitor and assess system alerts before working with LFR Engagement Officers to determine whether engagement with the individual is required.
- The LFR Operator must maintain a log of all alerts to facilitate and support the command team reviews during the deployment, and those that take place post-deployment. The LFR Operator will raise and report any concerns they have regarding the LFR system performance to the Bronze Commander as the subject matter expert (SME) who will then raise them with the Silver Commander if required.

4.1.2. LFR Engagement Officer

- LFR Engagement Officers may be deployed in uniform or plain clothes but must identify themselves as a police officer at the beginning of any engagement. It is the role of the LFR Engagement Officer to consider and make the final decision as to whether to respond to an alert, this may be supported by input from the LFR Operator. The LFR Engagement Officer must understand the LFR system, how it

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performs and what effect subject, system and environment factors might have. These officers must receive a full operational briefing before a deployment.

4.2. LFR deployments must be supported by a clear command structure. The following roles are defined for the purpose of creating an appropriate command structure:

4.2.1. Authorising Officer (LFRAO) (Superintendent rank or above, unless an urgent deployment is necessary, which an Inspector or above may authorise)

- The LFRAO authorises the use of LFR after considering its lawfulness, necessity and proportionality based on the information provided by the officer requesting the deployment and information provided by the Intelligence Team.

4.2.2. Gold Commander (Superintendent or above)

- Each LFR deployment will have a single Gold Commander who is in overall strategic command of the operation. Gold Commander will also appoint the command team for each deployment, to ensure sufficient resources are available to meet the strategic need for the deployment. Gold Commander will review and adopt the Operational Risk Assessment to ensure that it matches their strategic intention for the deployment. They can also perform the role of LFRAO.

4.2.3. Silver Commander (Inspector rank or above)

- There is only one Silver Commander for any LFR deployment and they report direct to Gold Commander. Silver Commander has tactical command of the deployment and is responsible for tactical implementation. They have front-line responsibility for making sure that there is compliance with the LFRAO's authority and Gold Commander's direction. They are responsible for making sure that the use of LFR and their tactical implementation remains lawful, necessary and proportionate and stays within the assessments that support the deployment and having regard to the effectiveness of the safeguards in place whilst LFR is being used. Silver Commander has the discretion to suspend or terminate the deployment.

4.2.4. Bronze Commander

- Bronze Commanders are assigned operational command responsibilities via Gold Commander and report to Silver Commander. The Bronze Commander must be present at the deployment location unless otherwise directed by Silver Commander. They are responsible for deployment of officers to the operation,

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making sure that they are adequately briefed and maintaining operational oversight of the deployment.

4.2.5. If LFR is used as part of a wider policing operation, the Gold Commander, Silver Commander and Bronze Commander roles may be replaced with other command terms or included within a larger command structure, depending on what works best for the operation. Whatever the terminology, the separation of Gold, Silver and Bronze responsibilities will be in accordance with this policy.

4.3. Response to an alert

4.3.1. When an alert is triggered, LFR Engagement Officers will review it before deciding what to do. They must consider whether the alert may have been affected by the person's appearance, the system, or the environment. An alert should not automatically lead to engagement. If the review and risk assessment (for example, if the person may be carrying a weapon) support it, officers are generally expected to engage with the person. How they engage will depend on the situation.

4.3.2. When engaging with someone, LFR Engagement Officers must act lawfully and in a fair and proportionate way. If no specific legal powers apply, officers can use their common law powers to ask questions to support the engagement. This is especially relevant when the person is not suspected of a crime or wanted for arrest, but BTP needs to check if they are following conditions set by a court.

4.3.3. Officers must use their own judgement when deciding whether to arrest or detain someone. An alert from the LFR system alone is not enough to justify arrest, search or detention. Officers should carry out further checks to confirm they have valid grounds. If someone refuses to cooperate and the officer genuinely believes they must act before checks can be completed, they may use their powers. In such cases, further checks should be done as soon as possible to review the decision without delay.

4.3.4. Under section 24(4) read with section 24(5) of the Police and Criminal Evidence Act 1984, officers have powers to arrest. However, if someone cannot be identified or refuses to give their name, this is not a crime on its own and does not automatically mean they should be arrested. Officers must be able to justify any action they take and ensure it is lawful.

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4.3.5. After engaging with someone following an alert, the LFR Engagement Officer must tell the LFR Operator what happened.

4.4. Proportionality

4.4.1. Before authorising a deployment, the LFRAO must consider whether it would be a proportionate means of achieving BTP's policing objectives, considering the impact of the deployment on the rights and freedoms of members of the public.

4.4.2. The impact of a deployment on the rights and freedoms or members of the public will vary, depending on the characteristics of the deployment. This section of the procedures is intended to assist LFRAO's in assessing the proportionality of a proposed deployment. LFRAOs should also have an understanding of the Legal Mandate.

4.4.3. The starting point for LFRAOs is to consider any interference with the rights and freedoms of members of the public that would be created by the proposed deployment. In particular:

- **Article 8 of the European Convention on Human Rights (ECHR) (right to a private and family life)** will be relevant in all cases, but to varying degrees. LFRAOs should always assume that Article 8 is always relevant when:
  i. Someone passes an LFR system
  ii. Someone is placed on a LFR watchlist for deployment
  iii. Where someone is engaged as a result of their being subject to an alert

  Article 8 may more strongly apply if the proposed deployment is to an area where members of the public have greater expectations of privacy, for example, close to a clinic or a school. The circumstances at the deployment location may also affect the intensity with which these privacy rights are engaged. For example, a sporting facility may attract a greater expectation of privacy when it is being used as a private members' club than if it is used to host a major ticketed sporting event.
- **Article 9 ECHR (freedom of thought, belief and religion)** will be relevant in some cases. For instance, if LFR is deployed during a religious festival it may have a chilling effect on the willingness of individuals to attend

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places of worship or celebration for the purposes of manifesting their religious beliefs.

- **Articles 10 and 11 ECHR (freedom of expression and freedom of assembly)** will be relevant in some cases, for example:
    i. Where LFR is deployed in policing protests, demonstrations or other types of assembly
    ii. Where a particular deployment may otherwise affect persons engaged in protests, demonstrations or other types of assembly (for example, because the demonstration is scheduled to pass through an LFR deployment).

  LFRAOs should consider whether the deployment might discourage people from joining a lawful protest or expressing their views.
- **Article 14 ECHR (freedom from discrimination)** protects people from discrimination in the enjoyment of one or more other human rights, even where those other human rights have not been breached. LFRAOs should consider whether the circumstances of the proposed deployment are likely to have a particular impact on one group in society, for example, because of characteristics relating to their sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, or birth.

4.5. The particular circumstances of deployments and how LFR may integrate into wider policing tactics will vary, but considering the following characteristics of a deployment will help LFRAOs to assess whether a particular LFR deployment will adversely affect the rights and freedoms of the public:

- The reasonable expectations of privacy that members of the public present at that location can be taken to have:
    i. Some places by their nature attract greater privacy expectations than others. For example, the expectations of privacy at a busy Zone 1 central London thoroughfare will typically be lower than in a quiet suburban park or backstreet. Some locations should be treated as inherently sensitive because of what attendance at the location potentially reveals about the individual. Such locations will include, for example, hospitals, General Practitioner (GP)

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surgeries and clinics, places of worship, legal advice centres, polling stations, schools (and other places particularly frequented by children), care homes and locations providing access to elected representatives.

ii. Some places will attract greater privacy expectations at certain specific times, such as a sporting facility.

iii. The number of cameras and coverage they provide should also be considered in this context to ensure the size and scale of the deployment enables those on a watchlist to be effectively located without disproportionately processing the data of members of the public.

4.6. Whether the proposed deployment might discourage people from using their fundamental rights:

i. Use of LFR in some contexts may deter individuals from exercising their fundamental rights. For example, using LFR at a protest may deter individuals from exercising their fundamental rights of free association and free expression, while using LFR outside a place of worship may deter individuals attending that place.

4.7. Having considered the interference created by the deployment with the fundamental rights and freedoms of members of the public, the LFRAO should go on to consider whether the deployment is a proportionate means of achieving BTP's policing objectives. They should do this in three stages

4.8. Decision maker steps

4.8.1. **Stage 1** requires the LFRAO to be satisfied that the deployment will be likely to achieve one or more relevant policing objectives. This should be underpinned by crime data and/or intelligence reporting showing why the proposed deployment falls within one of the use cases above.

4.8.2. **Stage 2** is to consider whether there are alternative means of achieving the relevant policing objective(s), which would have a lesser adverse impact on the fundamental rights and freedoms of potentially affected members of the public. There are two aspects to this:

- Non-LFR alternatives – could other less intrusive policing methods be used without unacceptably compromising the achievement of the relevant policing

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objectives? For example, in a 'Specific Intelligence' deployment, could the relevant objective be achieved by door-to-door enquiries, instead of using LFR?

- LFR alternatives – is the proposed deployment itself designed so as to avoid undue interference with the rights and freedoms of members of the public? Consider whether LFR could be deployed elsewhere, with fewer cameras, for a shorter duration to make it less intrusive without unacceptable compromising the achievement of the relevant objective.

4.8.3. If the relevant policing objectives could be effectively achieved through the use of less intrusive policing methods, then the deployment should not be authorised as it will not constitute a proportionate means of achieving BTP's legitimate aims. In all other cases, the LFRFAO should proceed to stage 3.

4.8.4. **Stage 3** is to consider whether the deployment strikes a fair balance between any interference with the rights and freedoms of those affected by the deployment and the achievement of the relevant policing objectives. This balancing exercise requires consideration of all the circumstances, including:

- The degree to which the deployment will enable policing objectives to be achieved. The more effective the deployment from a policing perspective, the more that weighs in favour of it striking a fair balance between competing rights and interests.
- The degree to which the deployment supports fundamental rights and freedoms. In some circumstances, the public's exercise of their fundamental rights may be under threat: for example, their Article 8 rights to physical integrity may be threatened by a risk to public safety, or their Article 9 rights to freedom of religion may be adversely affected by a threat to a place of worship. If the deployment is likely to provide support for the exercise of the public's fundamental rights by providing reassurance, then that will weigh in favour of the deployment striking a fair balance.
- How the deployment compares to any non-LFR alternatives. If the deployment would make a significantly greater contribution to achieving the policing aim than non-LFR alternatives (for example, because the alternatives would be significantly more resource-intensive), then that will weigh in favour of the deployment striking a fair balance.

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- The degree to which the deployment would interfere with fundamental rights and freedoms. LFRAOs should consider the nature of the interference, the seriousness of the interference, and the number of people likely to experience that interference. The more serious and extensive the interference with fundamental rights, the more that will weigh against the deployment striking a fair balance.

5. Governance, Oversight and Assessments

5.1. Governance and operational oversight of the use of the technology is approached in 3 stages:

- **Stage 1** – Pre-deployment
- **Stage 2** – Operational deployment
- **Stage 3** – Post deployment

5.2. Stage 1 – Pre-deployment

5.2.1. An officer must seek the authorisation to deploy Live Facial Recognition (LFR) via a Written Authority Document (WAD) form (Appendix B).

5.2.2. The authority to deploy LFR is provided by a British Transport Police (BTP) Live Facial Recognition Authorising Officer (LFRAO), who must be of at least the rank of Superintendent, unless in a case of urgency where an officer of the rank of Inspector or Chief Inspector may authorise the deployment.

5.2.3. In the event of an Inspector or Chief Inspector authorising a deployment, an officer of the rank of Superintendent (or higher) must be informed as soon as reasonably practicable. The Superintendent must then decide whether to authorise a continuation of the deployment, make changes to the authority (WAD) where they believe necessary, or to direct that it must stop.

5.2.4. Situations where the need for an authorisation to be granted urgently would include:

- An imminent threat to life or an imminent threat of serious harm to people or property and/or an intelligence/investigative opportunity with limited time to act with a seriousness and benefit of which supports the urgency of the action.

5.2.5. Prior to LFRAO authorisation the following documents must be completed and provided to the LFRAO for review – Application Form (Appendix B) and confirm

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that required assessments are in place – including Risk Assessment, Data Protection Impact Assessment and Equality Impact Assessment.

5.3. Before any deployment a BTP officer of National Police Chiefs Council (NPCC) rank will be notified by the LFRAO or Gold Commander. Stage 2 Operational Deployment

5.3.1. During the operational deployment, the engineers report and operational log must be completed to record the planning and execution of the deployment.

5.3.2. A Silver Commander shall, in conjunction with Bronze Commander review the use of LFR for the duration of the deployment to ensure that they remain satisfied that the use of LFR remains necessary and proportionate for the policing purpose identified, all identified safeguards remain in place and alerts are being responded to effectively, Subject, System and Environmental Factors are such that the use of the LFR system remains effective.

5.3.3. The Silver Commander must be empowered and have discretion to suspend or terminate the deployment.

5.3.4. Biometric 'non matched' images processed through the LFR system will be immediately deleted if not matched against the watchlist.

5.3.5. The Bronze Commander must conduct and record in the operational log a review of the activity at suitable intervals during the deployment at a time and frequency determined by the gold commander. The review by the Bronze Commander should address the continued legality, necessity and proportionality of the deployment, as well as providing some analysis on LFR system performance and the engagements undertaken. The Bronze Commander must report the output of their review to Silver Commander.

5.4. Stage 3 – Post Deployment

5.4.1. Following each LFR deployment debrief, and review shall be conducted, to ensure future deployments reflect learning identified from each deployment, and that the use of LFR remains an effective and proportionate policing tool. This debrief should be conducted as soon as reasonably practicable but no later than 31 days after a deployment.

5.4.2. Any matched biometric data will be deleted no more than 24 hours post deployment.

5.4.3. The retention of LFR camera mast CCTV footage will be kept up to 31 days as in line with general police retention periods for CCTV. (This is not biometric data)

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5.4.4. Post deployment an entry on the register of deployments is required to be completed.

5.5. Register of Deployments – Any deployment of LFR must be recorded on a centrally held register by the LFR Operator. This register will record:

- Name and rank of the LFRAO and Command Teams
- Date, time duration and locality of the deployment
- Watchlist composition statistics (not including any personal data) and the number of alerts, broken down as true alerts and false alerts including:
  - Perceived age range,
  - Perceived sex,
  - Perceived race (by reference to Policing IC Code) and
  - Number of engagements and their results by the LFR software. (whether any criminal disposal was utilised to resolve).

5.6. BTP is committed to ensuring that all required LFR documentation is regularly reviewed and updated in accordance with the law and LFR landscape.

5.7. BTP governance arrangements will be subject to regular review as LFR in introduced.

5.8. Each deployment must be appropriately assessed and authorised demonstrating both the necessity and proportionality of the use of LFR.

5.9. Within BTP the main governing board where all LFR decisions, documentation, updates and changes will be required to be approved is the Facial Recognition Tactical Board, chaired by the Head of Intelligence for BTP.

5.10. Updates are frequently provided to BTP's Chief Officer Group.

6. Data Retention

6.1. British Transport Police (BTP) must ensure that the processing of any data associated with LFR is conducted in a lawful way and in compliance with the BTP Live Facial Recognition (LFR) Policy. This means that:

- Where the LFR system does not generate an alert, that a person's biometric data is immediately deleted by the LFR software.
- The LFR watchlist is deleted as soon as reasonably practicable, and in any case within 24 hours, following the conclusion of the deployment.

6.2. Where the LFR system generates an alert, all related biometric data is deleted as soon as practicable and in any case within 24 hours of the deployment, except to the extent that:

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- Personal data is retained in accordance with the Data Protection Act 2018, Management of Police Information (MOPI) and the Criminal Procedures and Investigations Act 1996.
- Personal data is retained in accordance with BTP's complaints/conduct investigation policies.

6.3. All CCTV footage (not biometric data) generated by the LFR cameras is deleted within 31 days, except to the extent that the footage is retained:

- In accordance with the Data Protection Act 2018, MOPI and the Criminal Procedures and Investigations Act 1996.
- In accordance with The Police (Conduct) Regulations 2020 to assist with the investigation into any complaint against the police or its use of LFR. https://www.legislation.gov.uk/uksi/2020/4
- In accordance with an approved programme of testing in order to provide for the continued evaluation of the LFR system using operationally realistic data in line with the ongoing nature of the Public Sector Equality Duty – any requirement to retain the (CCTV) footage for longer than 31 days will be subject to an approved DPIA for such testing and arrangements to ensure data subjects are informed as to the arrangements that will apply to the use and retention of such data.

6.4. To support compliance the LFR system has a full audit capability, and the LFR log is retained in accordance with MOPI.

6.5. The loss or theft of any LFR hardware (laptop, mobile device, camera, etc.) or other data, irrespective of whether protected by encryption, must be reported immediately to the LFRAO/Gold Commander, Silver Commander and BTP's Data Protection Officer and Senior Duty Officer for immediate risk management and early recovery exploration. The control room should be notified and a log created. Force policy on lost / stolen items should be followed.

6.6. Data security – The LFR system includes a number of physical and technical security measures.

- These include: - images are transferred onto the LFR system via a USB device using an AES 256-bit hardware encrypted Integral USB 3.0 Crypto full disk hardware encryption engine.
- the LFR system is physically protected when in use and securely wiped following each Deployment.

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- role based access controls with limited user permissions are implemented on the LFR system.
- the LFR application is connected to mobile devices using a private access point with three levels of protection.
- Specific IP addressing, password access to the access point, and password access to the mobile App.
- The mobile App has a RESTful API and will be covered by SSL.
- the Dashboard and RESTful API are secured with SSL and TLS by default; and all connections are directed through HTTPS.
- a full audit is maintained of all user initiated actions undertaken during the course of a Deployment.
- technical issues with the LFR system will be dealt with by LFR System Engineers deployed on the operation.
- Remote support from the algorithms developers (NEC) or LFR partners (Bedroq) support desk can be sought by LFR engineers if a fault or issue occurs with the LFR system LFR equipment.

6.7 Any records created as a result of this policy will be retained in line with the BTP Overarching Retention Schedule.

7. Oversight Bodies and Regulatory Framework

7.1. Within British Transport Police (BTP), internal oversight of Live Facial Recognition (LFR) will be provided by the Facial Recognition Tactical Board, chaired by the Director of Intelligence for BTP and the Crime Programme Board chaired by the Assistant Chief Constable (ACC – Crime). External oversight and scrutiny will be delivered by the British Transport Police Authority (BTPA) through its established governance framework. This will include regular public meetings between BTP and BTPA, where the use, performance, and impact of LFR will be reviewed, ensuring transparency, accountability, and alignment with legal and ethical standards.

7.2. The BTP legal mandate sets out the legal framework for the use of Live Facial Recognition (LFR) technology while the policy document supports the implementation and use.

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7.3. Nationally the 'National Police Chiefs Council (NPCC) Facial Recognition Technology Board' provides oversight for the operational uses of facial recognition in the United Kingdom (UK) Law Enforcement.

7.4. Further oversight opportunities may arise in relation to the 'Joint National Biometric Strategic Board'. This is co-chaired by the NPCC and the Home Office Data and Identity Department, and involves representatives of the Information Commissioners Office, the Biometrics and Surveillance Camera Commissioner, and National Police Chief Scientific Adviser (NPCSA). Details of the roles:

7.4.1. Biometrics and Surveillance Camera Commissioner – The commissioner is independent of government. The commissioner has no enforcement or inspection powers regarding surveillance cameras and works with relevant authorities to make them aware of their duty to have regard to the code. See About us - Biometrics and Surveillance Camera Commissioner - GOV.UK (www.gov.uk)

7.4.2. Information Commissioner's Office (ICO) – The ICO upholds information rights in the public interest, promoting openness by public bodies and data privacy for individuals. The Data Protection Impact Assessment will assess compliance with Sections 35 – 40, (Principles 1 – 6) and Section 64 Data Protection Act 2018. See Information Commissioner's Office

7.4.3. National Police Chief Scientific Adviser (NPCSA) – The role of the Chief Scientific Adviser is to provide Police Chief Officers with advice on all aspects of policy on science and technology. See Chief Scientific Advisers - GOV.UK

8. Public Engagement

8.1. Public engagement must be supported by the use of online resources available to the public, which should be underpinned by a press and media strategy giving notice of deployments. At and around the location of deployments, notices providing information, and a method of providing feedback via email should be available.

8.2. Operational briefings delivered to officers and stakeholders before deployments should promote openness with the public and transparency about the use of LFR. Officers are encouraged to engage with the public to increase awareness of how LFR helps keep the public safe and how it helps bring offenders to justice. A method will be provided for public to access the BTP website where they can obtain additional information and key messages to promote trust and confidence through improved understanding.

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8.3. Key stakeholders, members of Independent Advisory Groups and community groups will be invited to observe deployments of LFR and to provide feedback to improve BTP's use of this technology.

8.4. In Advance of Deployments

8.4.1. British Transport Police (BTP) will make sure that pre-deployment:

- LFR deployments are notified to the public using BTP's website and other appropriate communication channels including social media, and
- Public information leaflets and posters for persons who may be engaged as part of the operation.
- The LFR Bronze Commander (for the operation) will provide a briefing to officers on their powers and the limits thereof. In particular, it must be made clear that there is no power to require an individual's cooperation in having their image captured by LFR and that reasonable alternate routes around the zone of recognition are available.
- External engagement is considered in discussion with BTP LFR Team. It may be appropriate to pursue engagement opportunities with a number of stakeholders, including Train Operating Companies (TOCs), public consultative or ethical review bodies. It is important that engagement is coordinated and so the LFR Team must be consulted before this kind of activity.

8.5. During Deployments

8.5.1. BTP will ensure that:

- Awareness raising measures are in place to ensure that the policing presence is overt and such that the public can establish that LFR is being used and understand the nature of the data being processed.
- Notices with a brief explanation and reference to the BTP LFR webpage are displayed immediately before the operational area.
- Information is offered to persons engaged by officers

8.6. After Deployments

8.6.1. BTP will ensure that:

- Stakeholder engagement will be ongoing.

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- The outcome of and results of LFR deployments are subject to evaluation and will be posted on the BTP website for the public to access the appropriate levels of information regarding the results. Details of the report will include:
    - Deployment location
    - Date of the deployment
    - Duration of the deployment
    - Number of subjects included on the watchlist
    - The minimum threshold setting
    - Total alerts
    - The number of Confirmed True Alerts and Confirmed False Alerts
    - The number of Unconfirmed True Alerts and False Alerts
    - The False Alert Rate
    - Estimated number of faces scanned during the deployment

8.7. Care must be taken to ensure that no personal data is published.

9. Watchlist Considerations

9.1. The performance of the Live Facial Recognition (LFR) system is heavily dependent on the quality of the images in the watchlist. The best images are those that follow a custody or passport style image that conforms to the National Policing Improvement Agency (NPIA) 'Police Standard for Still Digital Image Capture and Data Interchange of facial/mugshot and Scar, Mark and Tattoo Images (full frontal face, neutral expression, uniform lighting and plain background)'. Further details are included in the NPIA Practical Advice on Police Use of Digital Images.

9.2. Unless in exceptional circumstances and authorised by the Gold Commander, British Transport Police (BTP) will only use custody images in the watchlist no other form of image will be used and in most circumstances the most recently obtained image must be utilised in the watchlist, there are occasions when multiple images of a subject are available and consideration should be given to including these in the watchlist if it is advised they will improve the likelihood of locating those of interest to BTP.

9.2.1. In exceptional circumstances where conditions outlined in 5.2.4 are met, a CCTV image of a suspect may be included on the LFR watchlist as the probe image. This inclusion must be authorised by the Gold Commander for the LFR operation and supported by a documented assessment demonstrating that the use of the image

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is lawful, necessary, and proportionate to prevent serious harm. The decision must consider the expected level of privacy intrusion (rated on a scale of 1–5 as outlined in appendix G) and include a clear justification of the imminence of the threat and why alternative measures are insufficient. Consideration must be given to establish whether the quality of CCTV probe image is of sufficient quality to provide a facial match. This must be balanced with the urgency of identifying the suspect against any deterioration in the algorithm's performance due to the poorer quality of probe image and increase in potential false positives that may occur.

9.3. Compiling the Watchlist

9.3.1. The BTP legal mandate provides commentary on the legal considerations relevant to compiling a watchlist in a lawful way, this means that the inclusion of images of suspects in the watchlist is necessary and proportionate, that it meets the identified policing purpose and is legally held.

9.3.2. Key points include making sure the watchlist is limited in size needed to meet the policing purposes identified, and taking reasonable steps to be sure that the image used accurately identify the individual being considered for inclusion on the watchlist.

9.3.3. The size of the watchlist is relevant to the level of resource that should be available to support a deployment, there must be sufficient resources available to manage alerts generated by the LFR application.

9.3.4. As explained in Section 3 (LFR Overview), watchlist composition is normally restricted to individuals suspected to be in the proximity of an area, and therefore where there is some possibility or likelihood of an individual passing through an LFR deployment. BTP's watch lists will be composed of sought offenders suspected of committing serious offences on railway jurisdiction, wanted by the courts or subject to specific court orders. BTP's watchlist inclusion criteria will recognise the transient nature of criminal mobility on the railways. The rail network has high volumes of passenger movements and the network is used by offenders to facilitate crime.

9.3.5. BTP's intelligence case for LFR deployments will include the expectation for wanted persons to pass through a zone of recognition based on

- their last known address in proximity to the LFR deployment,

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- their offending behaviour in proximity to the LFR deployment,
- the transient nature of criminal mobility on the railways, and
- whether any intelligence highlights the expectation of them passing through the zone of recognition.

9.3.6. This means that an LFRAO may deem it necessary and proportionate to authorise the inclusion of people on a watchlist, even though there may not be specific intelligence to say where they may be found. The LFRAO will consider:

- Severity of the criminal offence in question – this will often be relevant to the level of urgency associated with locating and arresting an individual. Many individuals change their behaviour, including the places they reside and frequent when they know that they are wanted for a priority crime.
- Risk – the level of risk associated with an individual or the offence type sought, whether that risk is to the public or themselves or whether the management of a specific court order is a priority for public safety.
- Deployment location – the specific characteristics of the deployment location may increase the possibility or likelihood of an individual passing through as well as informing the scope and nature of the watchlist. Transport hubs have large volumes of people transiting from place to place, and offenders on BTP jurisdiction tend to use railway services to facilitate their offending.
    - Crime hotspots – The frequency and severity of serious offences define hotspots. The BTP strategic assessment scores serious offences against the Management of Risk in Law Enforcement (MORILE) Matrix and defines the forces 'priority offences' in the most current BTP control strategy. This demonstrates areas that high harm (CAT A / CAT B) offenders utilise for criminal activity and represent a reasonable likelihood of an offender passing through a zone of recognition.
    - Home address – Likelihood of offenders utilising the rail networks that are located in a reasonable distance to where the offender resides.

- Offence location – Offence locations as evidence of criminal mobility on the rail network which may be a significant distance from the offenders last known address.
- Specific intelligence – Intelligence demonstrates a likelihood of a sought person passing through the zone of recognition.

9.4. Clarity on the intelligence framework that underpins the construction of an LFR watch list is enshrined in the Approved Professional Practice on LFR Watchlist | College of Policing and also Appendix E of this policy. The court of appeal R (BRIDGES) V CHIEF CONSTABLE OF SOUTH WALES POLICE explored the accessibility and foreseeability for inclusion in a watchlist and where it LFR can be used. The WHO & WHERE question is explored in the legal mandate for LFR use available at Facial Recognition Technology | British Transport Police. The type of offences that would invite inclusion on a BTP watchlist (the WHO question) include:

- Category A Court Warrants (Serious Offences)
- Category B Court Warrants (Victim Based Crimes)
- Category C Court Warrants (Domestic Violence or Violence Against Women and Girls only)
- Category A offences (Serious Offences) – Wanted for Questioning
- Category B offences (Victim Based Crime) – Wanted for Questioning
- Category C offences (Domestic Violence or Violence Against Women and Girls only) – Wanted for Questioning
- Category A offences (Serious Offences) – Live Bail (see bail conditions note)
- Category B offences (Victim Based Crime) – Live Bail (see bail conditions note)
- Category C offences (Domestic Violence or Violence Against Women and Girls only – Live Bail (see conditions note)
- Ancillary court orders for offender management (See court order conditions note)
    - Sexual Harm Prevention Orders (SHPO)
    - Sexual Offences Prevention Order (SOPO)
    - Sexual Risk Orders (SRO)
    - Criminal Behaviour Orders (CBO)

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- Serious Crime Prevention Orders (SCPO)
- Domestic Abuse Protection Notice (DAPN)
- Domestic Abuse Protection Order (DAPO)
- Stalking Protection Order (SPO)

Bail Conditions Note

A sought person with bail conditions will be included on watchlist if they meet the requisite offence category and:

- Lives or offends in the LFR deployment location police division and
- By virtue of a specific bail condition that gives the police the opportunity to check, without reasonable suspicion for a breach of bail conditions or,
- By virtue of a specific bail condition would evidence a breach if the person was found at a LFR deployment location.

Court Order Note

A sought person with an ancillary court order will be included on the watchlist if they have the requisite order and:

- Lives or offends in the LFR deployment location police division and
- By virtue of a specific condition that gives the police the opportunity to check, without reasonable suspicion for a breach of a court order or,
- By virtue of a specific condition would evidence a breach of a court order if the person was found at an LFR deployment location.

9.5. Governing the Watchlist

9.5.1. The systems used to generate the watchlist are protected by role specific access control measures, and those using them are supported by role-specific training. This includes familiarisation with data protection principles.

9.5.2. BTP LFR documents provide measures to ensure that the watchlist is lawfully compiled, is current, is not retained beyond its purpose, and is only used for its LFR purpose.

9.5.3. The watchlist for any BTP deployment will be created no longer than 24 hours before a deployment and is required to be reviewed and approved by BTP's Head of Intelligence or a suitable nominated deputy before any deployment can take place.

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9.5.4. The inclusion of sought persons on any particular watchlist is responsive to the particular use case being considered for LFR deployment (See section 4 of this policy) and subject to the availability of watchlist images.

9.6. Proactive deployment

9.6.1. The following sought persons will be added to a proactive deployment LFR watchlist:

- Those persons sought by BTP where there are reasonable grounds to suspect that the individual is about to commit, is committing or has committed a recordable offence amounting to one or more priority crime types.
- Those persons suspected by the BTP of having committed a serious crime or where there are reasonable grounds to suspect that the individual is about to commit or is in the process of committing a serious crime.
- Those wanted by the courts.
- Those who are subject to court orders that if breached would render the subject liable to arrest and have been imposed on the subject where either:
  - i. The type amounting to one or more priority criminal offence types for that location, or
  - ii. Where the subject is subject to a civil order not made during criminal proceedings, and the purpose of the order is to protect a person or persons from criminality amounting to one or more priority offence types for that location, and
  - iii. Offenders who are subject to court orders or other restrictions under Multi-Agency Public Protection Arrangements pursuant to Section 325 to 327B of the Criminal Justice Act 2003 in order to protect the public.

9.7. Protective Security Operations (PSO)

9.7.1. The following sought persons will be added to a PSO LFR watchlist:

- Any person who has been convicted of, or cautioned for a crime under Section 2 of the Explosive Substances Act 1883, the Terrorism Act 2000, the Terrorism Act 2006, the National Security Act 2023, or is otherwise

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subject to a Part IV Notification Requirement under the Counter Terrorism Act 2008.

- Those persons sought by the BTP where there are reasonable grounds to suspect that the individual is about to commit, is committing or has committed a recordable criminal offence of a type giving rise to a threat to public safety.
- Those persons sought by the BTP where there are reasonable grounds to suspect that the individual is about to commit, is committing or has committed a serious crime.
- Those wanted by the courts.
- Those persons who are subject to court orders or a banning order in relation to domestic or international travel infrastructure:
  i. The offences for which they have been charged are violent, terrorist-related or weapon-related offences, or
  ii. Where the subject is subject to a court order not made during criminal proceedings, and the purpose of the order is to protect the public from violent, terrorist-related or weapon-related crime.
- In the context of an LFR deployment to support an Event PSO, those persons who are subject to court orders that:
  i. If breached would render the subject liable to arrest and
  ii. Have been imposed on the subject where either:
     a) The offences for which they have been charged are sexual offences, or
     b) Where the individual is subject to a court order not made during criminal proceedings, and the purpose of the order is to protect the public from sexual offences.
- Offenders who are subject to court orders or other restrictions under Multi-Agency Public Protection Arrangements pursuant to Section 325 to 327B of the Criminal Justice Act 2003 in order to protect the public.

9.8. Specific Intelligence Deployment

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9.8.1. The following will be added to an LFR watchlist in respect of any use case where the BTP has specific intelligence which indicates that a person falling within one of the following categories is likely to be in the proposed LFR deployment:

- Those persons where there are reasonable grounds to suspect that the individual is about to commit, is committing or has committed a serious crime
- Those wanted by the courts
- Offenders who are subject to court orders or other restrictions under Multi-Agency Public Protection Arrangements pursuant to Section 325 to 327B of the Criminal Justice Act 2003 in order to protect the public

9.9. Vulnerable persons requiring a response to ensure their safety ***At commencement of LFR pilot (Feb 2026) missing people will not be included in watchlists. This will be considered in future DPIA and EIA considerations*** Addressing Disproportionality

9.9.1. BTP will monitor the demographic representation of its watchlists. Where there is disproportionality, the LFRAO can commission additional community impact assessments to take place prior to deployment and / or additional engagement with community groups prior to authorising deployment.

9.9.2. The deployment of LFR will be in support of BTP policing priorities, intelligence-led assessment, both of which determine locality and the policing purpose. It is then the locality and policing purpose that determines the composition of the watchlist. The individuals found on a watchlist are included because there is a policing need to locate them, there are realistic prospects of doing so, and aligned with the policing purpose of the LFR deployment.

9.9.3. BTP recognises the duty placed on it as a public authority under the Public Sector Equality Duty (Equality Act 2010) to consider the impact of universal and situational protected characteristics and to eliminate discrimination and advance equality of opportunity. BTP's Equality Impact Assessment for LFR explores how BTP will seek to mitigate any undue consequences through its use. Suspects with protected characteristics **can** be included on an LFR watchlist, BTP has additional safeguards will be in place. Out of the nine protected characteristics set out in the Equality Act 2010, the characteristics with particular relevance to an LFR operation are age (under 18), disability, gender reassingmentand race. See Appendix C for a full table of the additional safeguards.

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9.9.4. BTP recognises the need to ensure that the systems and processes it relies upon are not inherently biased, and in this context that they do not disadvantage individuals based on protected characteristics. Regular tests are carried out using police officers and staff volunteers who are placed into a 'Blue Watchlist' (for testing only). The volunteers walk through the Zone of Recognition at the start of a deployment to measure the number of times those subjects are present in the Zone of Recognition against the number of alerts generated.

9.9.5. BTP has a number of measures to guard against a System Factor (system bias) affecting the generation of alerts. For example, being more likely to generate False Alerts based on individuals sharing the same perceived ethnicity or gender. These measures include that:

- Those involved in an LFR deployment monitor alerts, subject factors, system factors and environmental factors throughout the deployment. Should concerns arise that the LFR system is not performing correctly, the Sliver Commander will halt the deployment where necessary, and
- For the purpose of facilitating post-deployment reviews, alerts are retained for up to 24 hours. It provides further opportunity to consider the subject, system and environmental factors, alert reliability, and the effectiveness of the safeguards in place for the deployment, including the reviews undertaken by Silver Commander and Gold Commander during the deployment, and
- In the event post-deployment reviews identify an area of concern, BTP may approach the supplier to undertake further equitability testing where this appears necessary.

9.9.6. BTP will ensure that any supplier of artificial intelligence technology for use with LFR will have submitted their algorithm for regular independent testing to organisations such as NIST (National Institute of Standards and Technology) or the National Physical Laboratory and that the results are available to BTP for scrutiny.

10. Testing

10.1. The international standard (ISO IEC 30137-1:2024 'Use of biometrics with video surveillance systems, Part 1: System design and specification)' was published in May 2019. See Information technology — Use of biometrics in video surveillance systems

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10.2. ISO IEC 30137-1:2024 provides additional detail covering technical aspects of specifying and implementing a facial recognition system for use with video cameras, including camera selection and placement, adjustment of detection and matching thresholds, watchlist management, and the role of the LFR Operator. BTP has complied with the standard's recommendation that forces considering the use of LFR use the guidance to supplement the technical overview provided in the ISO. .

10.3. BTP has developed its LFR processes and associated guidance so as to provide for a reliable means of locating individuals using LFR with high-definition Closed-Circuit Television (CCTV) cameras (2MP and above). For a recognition system to deliver the desired results, all components need to be optimised and interoperate correctly. These system components include the hardware, the software, the LFR Operator, and associated policing resources on the ground.

10.4. A system using facial recognition will consist of many components. Those components that do not directly relate to the successful use of facial recognition are not considered in this guidance. Directly relevant components include:

- The cameras, network capability and their placement
- The environment the cameras operate in
- The database of reference images and metadata (the watchlist)
- The facial recognition software that scans faces and generates alerts
- The LFR operator and engagement officer who assess the alerts
- Having sufficient resources available to support the deployment

10.5. There will be testing of the LFR equipment before any deployment utilising 'blue list' (known police employees who are voluntarily placed on the 'watchlist' to provide accuracy testing considering situational conditions 'light/humidity/position'. This will be conducted at a police site (away from the public) with informed consent of police volunteers. Blue list testing can be conducted in public but would require the:

- Periodic testing and maintenance of equipment outlined in the technical manual provided by the software and equipment supplier will be performed.
- Operational testing of the equipment will also take place on site at the deployment location before any live operation commences. This is to ensure health and safety considerations are implemented and technical assurance of the reliability of the equipment is proven.

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11. Cameras and Camera placement

11.1. Cameras must be selected so that the image resolution, framerate, field-of-view and low-level light performance can provide images of sufficient quality for use in the facial recognition application. Current Facial Recognition (FR) systems typically require a facial image with between 20 and 100 pixels between the centres of the subject's eyes (Inter-Eye Distance or IED). The FR vendor should advise on specific requirements for their system.

11.2. Unless the environment is well controlled, cameras must be capable of operating at Wide Dynamic Range to generate high quality images under a variety of lighting conditions.

11.3. Cameras should ideally be positioned to capture faces as close as possible to the 'face-on' condition, similar to a passport image. This typically requires the cameras to further considered where those sought may be more likely to be blocked by a busy crowd to maximise the prospects of location.

11.4. Ideally the environment should be managed such that every face is evenly illuminated. Highly directional lighting, for example, strong sunlight, should be avoided, which may require consideration of how the lighting will change throughout the day.

11.5. In general, the Zone of Recognition will be smaller than the field of view of the camera, for example, not all faces in the field of view may be in focus and not every face in the field of view will be imaged with the minimum necessary IED.

11.6. A typical 2MP camera will provide sufficient resolution for Live Facial Recognition (LFR) to work on a maximum of 3 to 4 people side by side. Therefore, consideration needs to be given to camera location and the physical environment. For example, looking for opportunities to funnel or restrict the movement of people within the Zone of Recognition. However, if the flow is reduced beyond a certain level, individuals may be grouped very close together, blocking or partly blocking the faces of people (people behind people).

11.7. Detection and processing of faces is an intensive task for a computer system. The supplier of LFR software should provide guidance on hardware requirements and the number of faces that can be simultaneously processed from within a single frame. If the system is set to process too many faces, this will potentially result in delays to the LFR system response. It may also result in missed alerts due to 'dropped frames' where the software skips some of the video footage in an attempt to catch up.

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12. Key Performance Metrics

12.1. This section covers some of the key performance metrics that will be gathered when deploying Live Facial Recognition (LFR). It outlines the minimum requirements and so additional metric, or indicators may well be relevant and suitable for collation and analysis. There are two key metrics that determine the 'accuracy' of an LFR system. These are detailed in the below paragraphs.

12.2. True Recognition Rate (TRR)

12.2.1. The number of times when individuals on a watchlist are known to have passed through the Zone of Recognition and the LFR system correctly generated an alert, as a proportion of the total number of times when these individuals passed through the zone of recognition (regardless of whether an alert is generated).

12.2.2. This metric can only be generated by placing know subjects (for example, police officers or staff) into a Blue Watchlist and measuring the number of times those subjects are present in the Zone of Recognition against the number of alerts generated. Users of Facial Recognition (FR) systems (and vendors) must not focus so closely on maximising this metric, that they increase the False Alert Rate to inappropriate levels.

12.3. False Alert Rate (FAR)

12.3.1. There are two types of FAR measurements. The first is the System FAR, which is the number of False Alerts generated as a proportion of the total number of subjects processed by the LFR application. The second is the Operational FAR, which is calculated in the same way, but is measured after the LFR Operator has reviewed the output from the LFR application, and dismissed LFR application alerts assessed by the LFR Operator as false.

12.3.2. All of the TRR and FAR metrics should be recorded and reported. Operational experience to date suggests that in most scenarios the FAR should be 0.1% or less (i.e. less than 1 in 1000). It should be noted that the FAR is greatly affected by the number of subjects processed by the LFR application, and to a lesser extent, the size of the watchlist. This is a key reason why the number of persons included on the watchlist needs to be kept as small as possible, whilst still meeting operational objectives.

12.3.3. It should also be noted that the configurable threshold (the point at which two images being compared with result in an alert) will have a direct impact on the

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TRR and FAR. The threshold needs to be set with care so as to maximise the probability of returning correct possible matches, whilst keeping the number of false alerts to acceptable levels.

12.4. Recognition Time (RT)

12.4.1. A third important metric is the RT. Note that the actual amount of time taken to act on an alert will always be longer than the RT as additional time is needed for the LFR Operator to assess the alert and to pass to an LFR Engagement Officer to then make a final decision on whether to engage or not.

12.4.2. The RT must be sufficiently small that an effective response to an alert is possible before the subject has moved too far from the point where the initial alert occurred. High resolution video cameras with multiple faces in each frame will require significant processing power if the RT is to be fast enough to enable a real-time response.

12.5. Stakeholder Engagement

12.5.1. Pre Deployment - Before the initial LFR deployment, the LFR Team will conduct and document structured engagement with Independent Advisory Groups (IAGs), relevant oversight bodies, and internal BTP staff networks. This engagement will ensure that community perspectives, ethical considerations, operational risks, and equality impacts are gathered, reviewed and incorporated into the decision-making process. The responsible LFR Operational Lead will maintain a record of all consultation activities, including feedback received and how it influenced deployment planning.

12.5.2. Public Awareness Tools: At every deployment location, the LFR Team will ensure that public-facing awareness tools are in place, including prominently displayed QR codes directing members of the public to FAQs, policy documents, and feedback forms. These materials will be kept current and accessible, allowing the public to understand the purpose of the deployment, how biometric data is processed, and how they can provide feedback or raise concerns.

12.5.3. Feedback Volume and Sentiment: Following each deployment, the LFR Team will collect, monitor, and analyse all public feedback submitted through QR code links, digital forms, or other designated channels. The team will categorise this feedback by sentiment (positive, neutral, or negative) and produce a deployment

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evaluation summary. This analysis will be used to identify recurring themes, measure public confidence, and inform improvements to future deployments.

12.5.4. To maintain transparency and enhance public trust, the LFR Team will routinely publish public-facing materials—such as up-to-date FAQs, Equality Impact Assessment (EIA) summaries, and other relevant documentation—on approved communication platforms. The team will monitor engagement metrics, including page views, downloads, QR code scans, and public interaction rates.

12.6. Crime Reduction

12.6.1. Crime Type Breakdown: Monitor crime recording in specific crime categories (for example, robbery, violence against women and girls (VAWG), sex offences) in LFR zones.

12.6.2. Arrest and Charge Rates: Monitor how many arrests and charges result directly from LFR alerts.

12.6.3. Repeat Offender Identification: Monitor how many repeat offenders are identified and apprehend via LFR.

Additional Information

Appendices

Appendix A – Equality Impact Assessment (EIA)
Appendix B – Combined Operational Authority Pack (COAP)
Appendix C – Additional Safeguards for Protected Characteristics
Appendix D – Legal Framework
Appendix E – Intelligence Framework and Case
Appendix F – Surveillance Camera Code – Compliance Summary
Appendix G – Watchlist Imagery Privacy Considerations
Appendix H – Offence Categories Index

** Appendix can be found at Facial Recognition Technology | British Transport Police **

Associated Policies/Guidance/Documents

Live facial recognition | College of Policing

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Acronyms

LFR	Live Facial Recognition
BTP	British Transport Police
EIA	Equality Impact Assessment
DPIA	Data Protection Impact Assessment
ISA	Information Sharing Agreement
FR	Facial Recognition
SWP	South Wales Police
UK	United Kingdom
LFRAO	Live Facial Recognition Authorising Officer
PSO	Protective Security Operation
SME	Subject Matter Expert
ECHR	European Convention on Human Rights
GP	General Practitioner
WAD	Written Authority Document
IC	Identity Code
NPCC	National Police Chiefs' Council
MOPI	Management of Police Information
CCTV	Closed-Circuit Television
ACC	Assistant Chief Constable
NPCSA	National Police Chief Scientific Adviser
DNA	Deoxyribonucleic Acid
ICO	Information Commissioner's Office
NPCSA	National Police Chief Scientific Adviser
NPIA	National Policing Improvement Agency
ISO	International Organisation for Standardisation
IEC	International Electrotechnical Commission

IED	Inter-Eye Distance
MP	Megapixels
FAR	False Alert Rate
TRR	True Recognition Rate
RT	Recognition Time
IAG	Independent Advisory Group
QR	Quick Response
VAWG	Violence Against Women and Girls

Glossary

Adjudication	A human assessment of an alert generated by the Live Facial Recognition (LFR) application by an LFR engagement officer (supported, as needed by the LFR operator) to decide whether to engage further with the individual matched to a watchlist image. In undertaking the adjudication process, regard is to be paid to subject, system and environmental factors.
Administrator	A specially trained person who has access rights to the LFR application in order to optimise and maintain its operational capability.
Alert	An alert is generated by the LFR application when a facial image from the video stream is being compared against the watchlist and returns a comparison similarity score above the threshold setting.
Application Accuracy	Application accuracy can be considered to consist of the combined LFR technology accuracy and the human in the loop decision-making process. Accuracy is determined by measuring two metrics, the True Recognition Rate and the False Alert Rate. This is further explained below. The example given has been simplified to demonstrate the concept, but note that the metrics have been calculated in accordance with the agreed scientific method as set out by the International Organisation for Standardisation *(fig.1):*
Live Facial Recognition Authorising Officer (LFRAO)	The LFRAO provides the authority for LFR to be used. LFR may not be used without this authorisation
Biometric Template	A digital representation of the features of the face that have been extracted from the facial image. It is these templates (and not the

	images themselves) that are used for searching and which constitutes biometric personal data. *Note that templates are proprietary to each facial recognition algorithm. New templates will need to be generated from the original images if the LFR application's algorithm is change.*
Blue Watchlist	A watchlist comprising known persons that can be used to test system performance. For example, police officers/staff may be placed on a blue watchlist and 'seeded' into the crowd who walk through the Zone of Recognition during a deployment.
Candidate Image	The image of a person from the watchlist returned as a result of an alert.
Confirmed False Alert	Following an engagement, it is determined that the engaged individual is not the same as the person in the candidate image in the watchlist.
Confirmed True Alert	Following an engagement, it has been determined that the engaged individual is the same as the person in the candidate image in the watchlist.
Deployment	Use of an LFR as authorised by an LFRAO to locate those on an LFR watchlist.
Deployment Record	An amalgam of the LFR application, the written authority document and the LFR cancellation report. This sets out the details of a proposed deployment including, but not limited to: • Location • Dates and times • Deployment and watchlist rationale • Legal basis • Necessity • Proportionality • Safeguards • Watchlist composition • Authorising Officer • Resources • Relevant statistics • Outcomes • Summary of any issues • Threshold setting
Engagement	An officer communication with a member of the public because of an alert.

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Environmental Factors	An external element that affects LFR application performance, such as dim lighting, glare, rain, mist.
Faces Per Frame	A configurable setting that determines the number of faces that can be analysed by the LFR application in each video frame
Facial Recognition Technology (FT)	The technology works by analysing key facial features and then comparing them against the mathematical representation of know faces in a database and generates possible matches. This is based on digital images (either still or from live camera feeds).
False Alert	When it is determined by the Operator that the Probe Image is not the same as the Candidate Image in the watchlist, based on adjudication without any engagement. (The False Alert Rate is one of the two measures relevant to determining application accuracy.)
False Alert Rate – This is also referred to as '*False Positive Identification Rate*'	The number of individuals that are not on the watchlist who generate a false alert or confirmed false alert, as a proportion of the total number of people who pass through the Zone of Recognition.
False Negative	Where a person on the watchlist passes through the Zone of Recognition but no alert is generated. There are a number of reasons false negatives may occur, these include application, subject and environmental factors, and how hight the threshold is set.
Gold Commander	Is the officer who assumes overall command and has ultimate responsibility and accountability for the deployment. They are responsible and accountable for the policing operation/event and determine the strategic objectives. The Gold Commander must be the rank of Superintendent or above. For the purposes of the pilot, Gold Commander will be the C/Supt of the pilot division B-DIV.
Live Facial Recognition (LFR)	LFR is a real-time deployment of Facial Recognition Technology, which compares a live camera feed(s) of faces against a predetermined watchlist in order to locate those sought by police by generating an alert when a possible match is found.
LFR Engagement Officer	An officer whose role is to undertake the adjudication process following an alert, which may or may not result in that officer undertaking an engagement. These officers will also assist the public by answering questions and helping them to understand the purpose and nature of the LFR deployment.
LFR Operator	An officer or staff member whose primary role is operating the LFR system. They will consider alerts and via the adjudication process, will assist LFR Engagement Officers in deciding whether an alert should be actioned.

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LFR System Engineer	A person who BTP deems to have suitable technical qualifications and experience to optimise and maintain the operational capability of BTP LFR system.
Operator Initiated Facial Recognition (OIFR)	A near-real-time use of facial recognition technology, where an officer takes a photograph of a person using a police-issued device and submits it for an immediate search against a reference image database (such as custody images) to assist in identifying the individual for a policing purpose
Overt LFR	the use of facial recognition technology in a clearly visible and transparent manner during policing operations.
Possible Match	A person returned as a result of the Probe and Candidate Image being of sufficient similarity above the threshold. Where the similarity score exceeds the threshold setting, an alert will generate for consideration the LFR Operator
Probe Image	A facial image which is searched against a watchlist.
Recognition Time	The average time from when a face appears in the Zone of Recognition of the camera to when the LFR application generates an alert.
Retrospective Facial Recognition (RFR)	A post-event use of Facial Recognition Technology, which compares still images of faces of unknown subjects against an Image Reference Database in order to identify them.
Silver Commander	The officer who commands and coordinates the overall tactical implementation of the LFR deployment in compliance with the strategy set by the Gold Commander. The Silver Commander develops, commands and coordinates the overall tactical response of an operation, in accordance with the strategic objectives set by the Gold Commander.
Similarity Score	Is a numerical value indicating the extent of similarity between the Probe Image and Candidate Image, with a higher score indicating greater points of similarity.
Subject Factor	A factor linked to the individual, for example, the individual is wearing a head covering, is smoking, eating, or looking down at the time of passing the camera.
Threshold	The configurable point at which two images being compared will result in an alert. The threshold needs to be set with care to maximise the probability of returning correct possible matches for adjudication by the LFR Operator, whilst keeping the false alert rate to an acceptable level.

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True Alert	A true alert is when it is determined the Probe Image is the same as the Candidate Image in the watchlist.
True Recognition Rate – this is also referred to as the *'True Positive Identification Rate'*	It is the total number of times an individual(s) on a watchlist known to have passed through the Zone of Recognition, correctly generating an alert, as a proportion of the total number of times those individuals pass through the Zone of Recognition (regardless of whether an alert is generated). By way of an example, the rate would be 90% if 10 people on the watchlist each pass the LFR system, and an alert is generated correctly for 9 out of 10 of those peoples. The same would be true if 5 people each pass the LFR system twice, and 2 alerts were correctly generated for 4 of the people and only 1 correct alert for the 5th person.
Urgency	In the context of authorising an LFR deployment, a deployment that is related to an Imminent threat-to-life or a serious harm situation, and/or intelligence/investigative opportunity with limited time to act, where the seriousness and potential benefits support the urgency of action.
Watchlist	A set of known candidate images against which a Probe Image is searched. The watchlist is normally a subset of a much larger collection of images, from the Image Reference Database, and will have been created specifically for the LFR deployment.
Zone of Recognition	A three-dimensional space within the field of view of the camera and in which the imaging conditions for robust face recognition are met. In general, the Zone of Recognition is smaller than the field of view of the camera, so not all faces in the field of view may be in focus and not every face in the field of view is imaged with the necessary resolution for facial recognition.

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Version	Date	Reason for amendments	Amended by (job title)
V1	10/02/2026	Final Approved Version	LFR Business Lead

Policy Sponsor	Assistant Chief Constable, Public Contact, Specialist Investigation and Criminal Justice
Policy Owner	Chief Inspector, Live Facial Recognition Business Lead
Policy Author	Inspector, Live Facial Recognition Operational Lead

End of Policy

Monitoring and Review

The Live Facial Recognition Team are responsible for monitoring and reviewing this policy, the policy will be reviewed after the 6-month pilot has been completed and then at least every year (unless circumstances dictate it should be reviewed more frequently) to ensure that the most up to date and relevant processes are in place.

Who to contact regarding this Policy

If you have any questions regarding this policy, contact LFR Business Lead or LFR Operational Lead.