



Bedfordshire Police

Compassionate | Courageous | Inclusive | Professional | Proud

STANDARD OPERATING PROCEDURE (SOP)
FOR THE OVERT DEPLOYMENT OF
LIVE FACIAL RECOGNITION (LFR) TECHNOLOGY

Policy and Standard Operating Procedures

Title	Standard Operating Procedure for the Overt Operational Deployment of Live Facial Recognition (LFR) Technology
Policy Reference No	
Procedure(s) Ref. No	
Version No.	1
Senior Officer Lead	Detective Superintendent Aman S. Dhaliwal
Author	Detective Superintendent Aman S. Dhaliwal
Ratifying Group	Date
Date	

Contents

1	Introduction.....	3
2	Application.....	3
3	Terminology.....	3
4	Authority to Deploy LFR	4
5	Date, Time, Duration and Location of Deployment.....	6
6	Watchlist Generation	8
7	Beds LFR Documents	122
8	Management of Risk & Resource Levels.....	13
9	Planning & Booking	133
10	LFR Operational Roles.....	143
	LFR Command Team	143
	LFR Operator	154
	LFR Engagement Officer.....	15
	LFR System Engineers.....	16
11	Post-Deployment.....	176
12	LFR Deployment Summary Flowchart.....	18
13	LFR Application Security.....	20
14	Data Retention & Data Management.....	20
15	Further Documentation	Error! Bookmark not defined.

1 Introduction

1 Introduction

- 1.1 This Standard Operating Procedure (SOP) explains the standard procedures to be adopted when planning for and using Live Facial Recognition (LFR) technology in support of policing operations. Compliance with the SOP will help ensure a corporate response to the use of this policing tool.

2 Application

- 2.1 All Bedfordshire Police (Beds) police officers and police staff, including the extended police family and those working voluntarily or under contract to the Commissioner must be aware of, and are required to comply with, all relevant Beds policy and associated procedures.
- 2.2 This SOP applies in particular to officers and staff in the following roles:-
- a) All operational officers and police staff, both uniform or detective, and their supervisors involved in the planning and Deployment of LFR technology; and
 - b) All police officers and police staff involved in any subsequent investigation resulting from the operational Deployment of LFR technology; and
 - c) All Authorising Officers (AO); and
 - d) The operational command team for any LFR Deployment (Gold, Silver and Bronzes); and
 - e) LFR Operators, LFR Engagement Officer and LFR System Engineers.

Note: This list is not intended to be exhaustive.

3 Terminology

- 3.1 This SOP focuses exclusively on LFR. Terminology relating to LFR is defined in the Beds LFR Policy Document.

4. Authority to Deploy LFR

- 4.1 In normal circumstances the authority given by an AO to deploy LFR in support of a policing operation should be made by an officer not below the rank of Superintendent. Their authorisation should be recorded in writing.
- 4.2 Prior to AO authorisation and the Deployment of LFR in public spaces, a number of documents must be completed and a Beds officer of NPCC rank¹ must be engaged by the AO. Whilst NPCC do not provide authority for LFR Deployment, consultation at this level exists so as to expose the proposed Deployment to an elevated level of strategic thinking, whereby pan-Bedfordshire issues are taken into account as much as possible. This affords NPCC the opportunity to veto the Deployment altogether, or to ask the AO to consider what mitigation is required to address concerns at hand.
- 4.3 The AO must notify the Beds Police and Crime Commissioner (or designated staff member) prior to any deployment.
- 4.4 Where an AO is not immediately able to provide their decision in writing, their authorisation may be given verbally. Verbal authorisation must then be recorded in writing by the AO as soon as is practicable.
- 4.5 The authority of the AO:-
- a) must articulate the legitimate aim of the Deployment and the legal powers that are being relied upon to support the Deployment; and
 - b) means that the AO is satisfied that the Deployment complies with Beds LFR documents, or is otherwise authorised; and
 - c) must, from a Human Rights Act 1998 perspective, articulate (i) how and why the Deployment is necessary (and not just desirable), and (ii) is proportionate to achieve the legitimate aim of the Deployment; and
 - d) must, from a Data Protection Act 2018 perspective, articulate that it is strictly necessary for the Beds' law enforcement purposes; meaning there is a 'pressing social need' and it is not reasonably viable to address this through less intrusive means, either because less intrusive tactics have been tried, or it is reasonably believed that those tactics are unlikely to be effective; and

¹ NPCC – 'NPCC rank' denotes an officer holding the rank of ACC or above.

- i. Necessary on at least one of the following grounds (the ground(s) to be confirmed by AO):-
 - a. Necessary for Beds' lawful policing purposes² for reasons of substantial public interest; and / or
 - b. Necessary for the administration of justice; and / or
 - c. Necessary for the safeguarding of children and/or of individuals at risk; and
 - ii. Necessary notwithstanding any expectations people may have pursuant to their Article 8 human rights regarding the respect of private and family life, as well as other human rights considered by the AO; and
- e) must articulate that the AO has given regard to the safeguards proposed for the Deployment and the safeguards contained within the Beds LFR Documents, and considers that the Deployment in question is a proportionate use of policing powers when considering their use, and balancing them in the context of considerations relating to the Human Rights Act 1998 and the Data Protection Act 2018 and UK GDPR; and
- f) means that the AO is satisfied that all reasonable steps have been taken to ensure that the composition of the Watchlist complies with Beds LFR Documents, including the legality, necessity and proportionality criteria; and
- g) must articulate any authority to include additional categories of persons to the Watchlist, including the legality, necessity and proportionality criteria, in addition to those included to meet the purpose of the Deployment; and
- h) means that the AO is directing that all police officers / staff engaged in the Deployment must have received LFR training as per the Beds LFR Documents; and
- i) means that the AO considers that the Deployment is proportionate with the benefits anticipated from the use of LFR outweighing the concerns and impacts there may be in relation to people's human rights and rights relating to equalities; and
- j) means that the AO is satisfied that the control measures in the Data Protection Impact Assessment, Community Impact

² This being defined as "is necessary for the exercise of a function conferred on a person by an enactment or rule of law" in the Data Protection Act 2018. This will typically be the ground relied on to support Beds Deployments of LFR since this recognises the policing powers conferred on a Constable.

Assessment, and Equality Impact Assessment have been reviewed and considers them to be appropriate mitigants for the Deployment.

- 4.6 In cases of urgency an officer below the rank of Superintendent, but not below the rank of Inspector, may authorise the Deployment of LFR in support of a police operation if they are satisfied that such authorisation is required as a matter of urgency. All authorisations must comply with the requirements set out in paragraph 4.4
- 4.7 Situations where the need for an authorisation to be granted urgently would include:-
- a) an imminent threat-to-life or of serious harm to people or property; and / or
 - b) an intelligence / investigative opportunity with limited time to act, the seriousness and benefit of which supports the urgency of action.
- 4.7 If an authorisation is given under the urgency criteria above, it shall be the duty of the AO who gives it, to inform an officer of the rank of Superintendent or above as soon as practicable, that LFR has been deployed and the reasons why. It is for the Superintendent to then authorise the Deployment to continue, making changes to the authority as they deem necessary, or direct that it must stop.
- 4.8 Should a further law enforcement purpose be identified after the AO has issued their authority for an LFR Deployment, processing in respect of the law enforcement purpose is not permissible unless the AO grants a further authority for it. Such authority would consider the lawfulness, strict necessity and proportionality of using LFR to meet the law enforcement purpose and its compatibility with the original law enforcement purpose.

5 Date, Time, Duration and Location of Deployment

- 5.1 The AO should define the date, time, location and duration the Deployment is authorised for.
- 5.2 During any policing operation where LFR is Deployed, signs publicising the use of the technology must be prominently placed in advance (outside) of the Zone of Recognition. This is to alert members of the public of the presence of LFR technology and allow them sufficient time to exercise their right not to walk into the Zone of Recognition.
- 5.3 If a person decides not to walk through the Zone of Recognition this action does not in itself justify the use of a policing power. Beds staff deployed to this operation must be accountable for their own actions and must exercise their powers in accordance with the law and the Code of Ethics.

- 5.4 Any member of the public who is Engaged as part of an LFR Deployment should, in the normal course of events, also be offered further information about the technology. Any person who requires additional information relating to LFR should be provided with contact information for the team leading the deployment.
- 5.5 When reviewing a potential deployment location, AOs should also consider those who are likely to pass the LFR system, as well as the following.
- a. The reasonable expectations of privacy that the general public may have as a whole at that location:
 - i. some places attract greater privacy expectations than others (see 5.5 (b))
 - ii. the number of cameras used actively by the LFR system should also be considered in this context, to ensure that the size and scale of the deployment enables those on a watchlist to be effectively located without unnecessarily processing biometric data
 - b. Whether a proposed deployment location attracts particular concerns, by reference to those expected to be at a particular location³. Where it is practicable to identify a member of the community as being responsible for a proposed deployment location (for example outside a place of worship), and where that location raises a greater expectation of privacy, consideration should be given to liaising with that person as part of a community impact assessment process. Legal advice should be sought where appropriate. Examples where those who attend may have a greater expectation of privacy, feel less able to express their views or otherwise be more reluctant to be in the area include:
 - i. hospitals
 - i. places of worship
 - ii. centres for legal advice
 - iii. polling stations
 - iv. schools (and other places particularly frequented by children)
 - v. care homes
 - vi. assemblies or demonstrations
- 5.6 Where privacy or other human rights considerations are identified in relation to a particular deployment, the AO needs to consider the necessity to deploy LFR to that particular location and also consider whether the aims being

³ If a deployment is necessary at a site that is focused on children (for example, outside a school) or a protected characteristic, appropriate signage and information about the LFR deployment should typically be reasonably accessible to children or those with the protected characteristic (as applicable) who may pass through the zone of recognition. When assessing if a deployment can be considered proportionate or not, consideration is needed as to the nature of the deployment and data processing that is proposed, as well as the effectiveness of the mitigations.who may pass through the zone of recognition. When assessing if a deployment can be considered proportionate or not, consideration is needed as to the nature of the deployment and data processing that is proposed, as well as the effectiveness of the mitigations.

pursued could be similarly achieved elsewhere. In instances where that location is necessary (and the processing of data at that site is strictly necessary), AOs need to identify any mitigations that are viable in the circumstances and then weigh the rights of those engaged by the LFR system against the likely benefits of using LFR. This is to ensure that the policing action proposed is not disproportionate to the aim being pursued.

Watchlist Generation

- 6.1 This section covers the generation and management of Watchlists to be used in LFR Deployments. Watchlists for use with LFR must be specific to an operation or to a defined policing objective. Watchlists:-
- a) must be reviewed before each Deployment to ensure that all images meet the necessity and proportionality criteria for inclusion, and the make-up of the Watchlist should not be excessive for the purpose of the LFR Deployment; and
 - b) must only contain images lawfully held by Beds; and
 - c) must only use images where all reasonable steps have been taken to ensure that the image is of a person intended for inclusion on a given Watchlist; and
 - d) should not be imported into the LFR application more than 24 hours prior to the start of the Deployment in order to ensure the Watchlist is current.
- 6.2 Each Deployment must specifically identify and document whether the Watchlist contains persons who are believed or suspected to be aged under (i) 18-years-old and (ii) under 13-years-old.
- 6.3 Given the potential for System Factors relating to age, specific regard needs to be had to the importance of locating those aged under-18 on a risk-based approach in line with the Beds Documents, with a particular focus on ensuring the necessity case is fully made out.
- 6.4 If LFR is to be used to locate person aged under 13-years-old, specific regard should be had to anticipate LFR application performance issues. Specific advice must (at this time) be sought from Special Legal Casework and the deploying technical LFR team prior to seeking any authorisation from an AO. Where authorisation is then sought, this advice needs to be provided to the AO.
- 6.5 Examples of images that may be deemed appropriate for inclusion within an LFR Watchlist include:-
- a) custody images of individuals:-
 - i. wanted by the courts; and / or

- ii. wanted for arrest by the police; and / or
 - iii. subject of a court order, bail conditions, or other restriction that would be breached if they were at the location at the time of the Deployment; and / or
 - iv. missing persons deemed to be vulnerable / at risk (see paragraph 6.7); and/or
 - v. presenting a risk of harm to themselves or others (see paragraph 6.8).
 - vi. who are a victim of an offence, or a person who the police have reasonable grounds to suspect would have information of importance and relevance to progress an investigation, or is otherwise a close associate of an individual and that individual themselves would fall within paragraphs (i) – (v) (requires AO authority). See paragraph 6.9.
- b) police originated non-custody images involving (requires case-by-case assessment):-
- i. wanted by the courts; and / or
 - ii. individuals wanted by the police; and / or
 - iii. subject of a court order, bail conditions, or other restriction that would be breached if they were at the location at the time of the Deployment; and / or
 - iv. missing persons deemed to be vulnerable / at risk (see paragraph 6.7); and / or
 - v. individuals presenting a risk of harm to themselves or others (requires AO authority). See paragraph 6.8
 - vi. who are a victim of an offence, or a person who the police have reasonable grounds to suspect would have information of importance and relevance to progress an investigation, or is otherwise a close associate of an individual and that individual themselves would fall within paragraphs (i) – (v) (requires AO authority). See paragraph 6.9.
- 6.6 Non-police originated images must not be considered for inclusion in a Watchlist without formal authority of the AO.
- 6.7 **Missing persons deemed increased risk:** This term will be subject to the College of Policing definition of medium risk (or above) that is contained in the Missing Persons APP, meaning that the risk of harm to the subject or public is assessed as likely but not serious. The harm can apply equally to the subject or any other member of the public. A decision to include a missing person on

the watchlist should take into account the individual circumstances of each case, including the impact it may have on the missing person and their expectations or privacy.

6.8 **Presenting a risk of harm:** This term will be informed by the intelligence case. This will need to inform the AO as to how:

- c. the individual presents a risk of harm
- d. using LFR to facilitate their location is necessary to manage the risk of harm identified
- e. why it is necessary for the police to take action in order to manage the risk of harm

The addition to the watchlist will also need to be a proportionate response to the need to manage the risk of harm. Addressing the risk of harm in this context will need to have a legal basis under a policing common law power or statutory power. 'Harm' may include a risk of harm arising in relation to a person's welfare and/or a financial harm, including as a result of fraud or other dishonesty. Harm can also arise if a person potentially poses a risk to national security.

6.9 **Victim of an offence, or a person who the police have reasonable grounds to suspect that person would have information of importance and relevance to progress an investigation, or is otherwise a close associate of an individual, and that individual would themselves fall within paragraphs 6.5 a and b (i) – (v) of the categories that may be deemed appropriate for inclusion within an LFR Watchlist:** The necessity and proportionality threshold for any Watchlist inclusion is high and the use of the category will be by exception. This is because, unlike the other categories, the person(s) sought are not at risk of harm and are not suspected of committing criminal offences; the necessity for inclusion should be based on a specific intelligence-case with the need for the inclusion on a Watchlist being supported by a written rationale. In documenting their rationale, the applicant would need to be able to demonstrate, to the AO's satisfaction, why the inclusion of a person in this category is:

- a. necessary to help locate a person who is wanted by the courts and/or the police, and/or
- b. necessary to advance the policing investigation; and/or
- c. necessary to ensure their safety and/or the safety of others

Watchlist Categories

6.10 It is usually appropriate to include several Watchlist Categories for a single deployment. This assists in managing the risk associated to the generated Alerts and ensures the efficiency of the Deployment. These Watchlist Categories include but are not limited to:

- a) Persons who are currently Suspect or Wanted for offences committed in Bedfordshire.

For a person to be listed as Suspect or Wanted on Beds systems consideration will already have been given to the necessity and proportionality of their apprehension. To ensure proportionality this will generally be limited to areas those wanted persons are known to reside or commit their criminality.

- b) Those with outstanding arrest warrants or are otherwise required by the courts within the Bedfordshire area.

The courts have already given consideration as to the necessity to locate this category of persons and given a direction that they should be apprehended. Such people pose a risk to the public in general. In such circumstances, and noting that this is limited to those wanted by the courts within the Beds' area of operation, it is appropriate to consider whether LFR should be used to locate these people.

- c) Those identified as suitable for inclusion on an LFR Watchlist where the purpose of locating these individuals is compliant with the Deployment's legitimate aims and common law duties.

In these circumstances, the intrusion to the public passing the LFR system is no greater, with the need to Deploy having already been made out. There may however be an opportunity for LFR to further protect the public by locating other people sought by Beds, people who are missing or otherwise vulnerable and at risk, and those who are consider high risk individuals.

The use must also be in furtherance of the Deployment's legitimate aim, and the considerations relating to the composition of the Watchlists. This is not least as the addition of any image to a

Watchlist involves the processing of that person's data and is an interference with their Article 8 Rights. For these reasons, the decision to include persons in a Watchlist needs to be fully articulated in the LFR Application and authorised by the AO.

In circumstances where there is an urgent need to add a subject to the Watchlist the investigating officer (IO) is best placed to assess the need to locate an individual and why LFR is both necessary and proportionate in the circumstances. The IO will also understand what efforts have been made to locate the person, or why other options may not be viable in the circumstances. Where an IO decides to pursue use of LFR, they should record their decision and rationale. The IO must contact the LFR operational team to have individuals added to the Watchlist and ensure that they keep their decision to pursue the use of LFR under review. When an individual no longer needs to be on a Watchlist, the IO must contact the LFR team to have the individual removed as soon as practicable.

- 6.11 The AO must have regard to the nature of the Deployment when considering Watchlist composition to ensure it is not excessive. Factors that may favour adding persons to a Watchlist include: -
- a) the LFR Deployment is in area where there is a high flow of people; and
 - b) the LFR Deployment is in an area frequented by the transitory public; and
 - c) the LFR Deployment is to take place in areas where intelligence, other information and / or the AO's experience mean that it is reasonable to suspect that those wanted might be located with the help of the Deployment; and
 - d) potentially increased public safety gained from the inclusion of those persons to the watchlist.

7. Beds LFR Documents

- 7.1 Assessments; For each authorised LFR operation, the following assessments need to be created, reviewed, and amended where necessary:-
- (i) Data Protection Impact Assessment* (Review/Amend/Adopt); and
 - (ii) Equality Impact Assessment* (Review/Amend/Adopt); and

- (iii) Community Impact Assessment*
(Review/Amend/Adopt); and
- (iv) The Surveillance Camera Commissioner's Self-Assessment*
(Review/Amend/Adopt);

Note: *Any assessment listed above showing 'Review/Amend/Adopt' has already been created by the LFR team providing the LFR resource. Each will require a case-by-case consideration to ensure the document remains appropriate and sufficient for each LFR operation.

8 Management of Risk & Resource Levels

- 8.1 Each Deployment should be risk assessed in line with Beds procedure. The anticipated risk to officers and the public should be balanced against the overall intelligence picture, relevant factors linked to persons included on the Watchlist (e.g. seriousness of offences and warning markers linked to the use of violence, carriage of weapons, and propensity to escape, etc), the physical environment surrounding the Deployment, timing, community tension, and any other factors that appear relevant.
- 8.2 The level of resources, including back-up contingencies, required to support each Deployment is a matter to be determined by the operation's command team.
- 8.3 Given the level of intrusion linked to the use of LFR for members of the public passing through the Zone of Recognition, and the processing of biometric data, it is vital that the command team ensure that sufficient resources are available to respond effectively to Alerts and to meet the law enforcement purpose of the LFR Deployment.
- 8.4 LFR System Engineers will be deployed to support LFR Deployments and will come with suitable vehicles where required.
- 8.5 All Beds officers and staff deployed on LFR Deployments must be compliant and in date with Beds First Aid and where applicable officer safety (OST) training requirements. All Beds officers and staff involved in an LFR Deployment must receive LFR training prior to being deployment.

9 Planning & Booking

- 9.1 As part of the LFR planning process and before the AO authorises a Deployment, the LFR team being considered for deployment (including LFR System Engineers) should be consulted on the appropriateness and viability of a Deployment.

10 LFR Operational Roles

LFR Command Team

10.1 LFR Deployments must be supported with a clear command structure. The following roles are defined for the purpose of creating an appropriate hierarchical command structure:-

a) Gold Commander (Superintendent or above⁴); There is only one Gold Commander for any LFR Deployment. Gold has strategic command of the operation and must ensure that their 'strategic intention' aligns with the Written Authority Document. Gold maintains overall responsibility for ensuring that the use of LFR remains lawful, necessary and proportionate. Gold will also liaise as necessary with NPCC ranked officers. Gold can also perform the AO role.

b) Silver Commander (Chief Inspector or above); There is only one Silver Commander for any LFR Deployment. Silver reports to Gold. Silver has tactical command of the Deployment and is responsible for tactical implementation. This officer has absolute authority to suspend or terminate the Deployment at their discretion. They are also responsible for ensuring that the use of LFR and their tactical implementation remains lawful, necessary and proportionate throughout the duration of the Deployment, having particular regard to the effectiveness of the safeguards in place whilst LFR is being used.

c) Bronze Commander (Sergeant or above); Bronze Commanders are assigned operational command responsibilities by Silver. Bronze Commanders report to Silver. Bronze Commanders should be present at Deployment locations unless otherwise directed by Silver. There may be more than one Bronze

Commander subject to requirements set by Silver. Where this is the case, Silver must document command responsibilities and protocols with sufficient clarity and ensure that they are fully understood by all officers and staff involved in the Deployment.

10.2 Where LFR Deployments form part of a larger overarching policing operation, the terms Gold, Silver and Bronze (as described above) may be substituted for alternative command team terminology or be subsumed into

⁴ Note that where the urgency criteria (para 4.4) has been applied, the Gold Commander may be of Inspecting rank. However, this should revert to Superintendent or above as soon as a

Superintendent reviews the Deployment and provides authority for the Deployment to continue.

a larger command structure as necessary and appropriate for the effective delivery of the overarching policing operation.

LFR Operator

- 10.3 LFR Operators receive detailed training prior to being deployed operationally. Their role is to monitor and assess application Alerts, before working with LFR Engagement Officers (as necessary) to decide whether an Engagement is required.
- 10.4 The LFR Operator must log all Alerts to help facilitate and support command team reviews during the Deployment, and those that take place post-Deployment. The LFR Operator must flag any concerns they have regarding LFR system performance to the Silver Commander.
- 10.5 The LFR Operator's log should include:-
- a) the LFR Operator's assessment of each Alert as part of their assistance to the Engagement Officer when Adjudicating over Alerts prior to making any decision to Engage; and
 - b) what decision was taken regarding whether to Engage a member of the public or not; and
 - c) whether an Engagement was successfully undertaken, and the outcome of the Engagement.

LFR Engagement Officer

- 10.6 LFR Engagement Officers must understand the LFR application, how it performs, and what effect Subject, System, and Environmental Factors might have.
- These officers must receive a full operational briefing prior to deployment. These officers may be deployed in uniform or plain clothes.
- 10.7 When conducting an Engagement, LFR Engagement Officers must ensure that they do so lawfully, and in an appropriate and proportionate manner. Officers must comply with the Code of Ethics at all times. Wherever possible, members of the public who have been subject of an Engagement, should be supplied with an LFR information leaflet.
- 10.8 The LFR Operator may be supportive of an Engagement taking place, but in any case, it is always for an LFR Engagement Officer to make their own final decision on whether an Engagement should take place⁵. It must not be an automatic consequence that an Alert results in an Engagement. In

⁵ The driving force behind this point is that an LFR Operator should not be making the decision that an Engagement Officer carries out an Engagement. Notwithstanding this point, LFR Engagement Officer must still follow lawful orders given by supervisors. It still follows that any officer must form their own 'reasonable grounds of suspicion' (which may rely on information provided by others), and/or have a clear understanding of the legal basis supporting any action they take.

making their decisions, LFR Engagement Officers must give due regard to the likelihood of Subject, System, or Environmental Factors influencing the generation of an Alert.

- 10.9 When an Engagement is initiated, it is for the officers involved to investigate the identity of the person Engaged using appropriate and lawful means at their disposal.
- 10.10 Whilst officers must exercise their own discretion when using their powers of arrest and detention, Beds policy is that an LFR application-generated Alert on its own, indicating that a person is wanted, should not ordinarily be taken as providing sufficient grounds for arrest or detention. Officers should always seek to make sufficient additional enquiries to satisfy themselves of their grounds to arrest or detain. Where confronted with a non-compliant subject, and the circumstances are such that an officer has an honestly held belief they must use their powers of arrest/detention before further checks have been possible, and this results in the use of those powers, then further checks (as necessary) should be made as soon as is reasonably practicable, so that the decision to arrest/detain is reviewed without unnecessary delay.
- 10.11 If an Engaged individual cannot be identified or fails to confirm their identity, this alone does not constitute a criminal offence and does not necessarily render them liable to arrest. Officers must be in a position to justify the use of any powers, any action taken, and have a lawful basis for doing so.
- 10.12 After any Engagement (that follows an Alert), the LFR Engagement Officer must update the LFR Operator with the outcome of that Engagement.
- 10.13 Where members of the public choose to exercise their right to avoid an LFR Zone of Recognition, officers are reminded that this is not an offence. The police have no legal powers to direct or compel members of the public to enter a Zone of Recognition. None of this means that LFR Engagement Officers, or other officers involved in an ancillary role linked to an LFR Deployment, cannot or should not engage with a member of the public as they would do in any other set of circumstances where someone's behaviour or presence gives rise to suspicion or the use of any other policing power where it is right and proper to do so.

LFR System Engineers

- 10.14 LFR System Engineers have enhanced technical training for the Deployment of LFR (see SWP LFR Policy Document for further information). LFR System Engineers are responsible for the set-up of the LFR equipment and the optimisation of the LFR application to maximise performance.

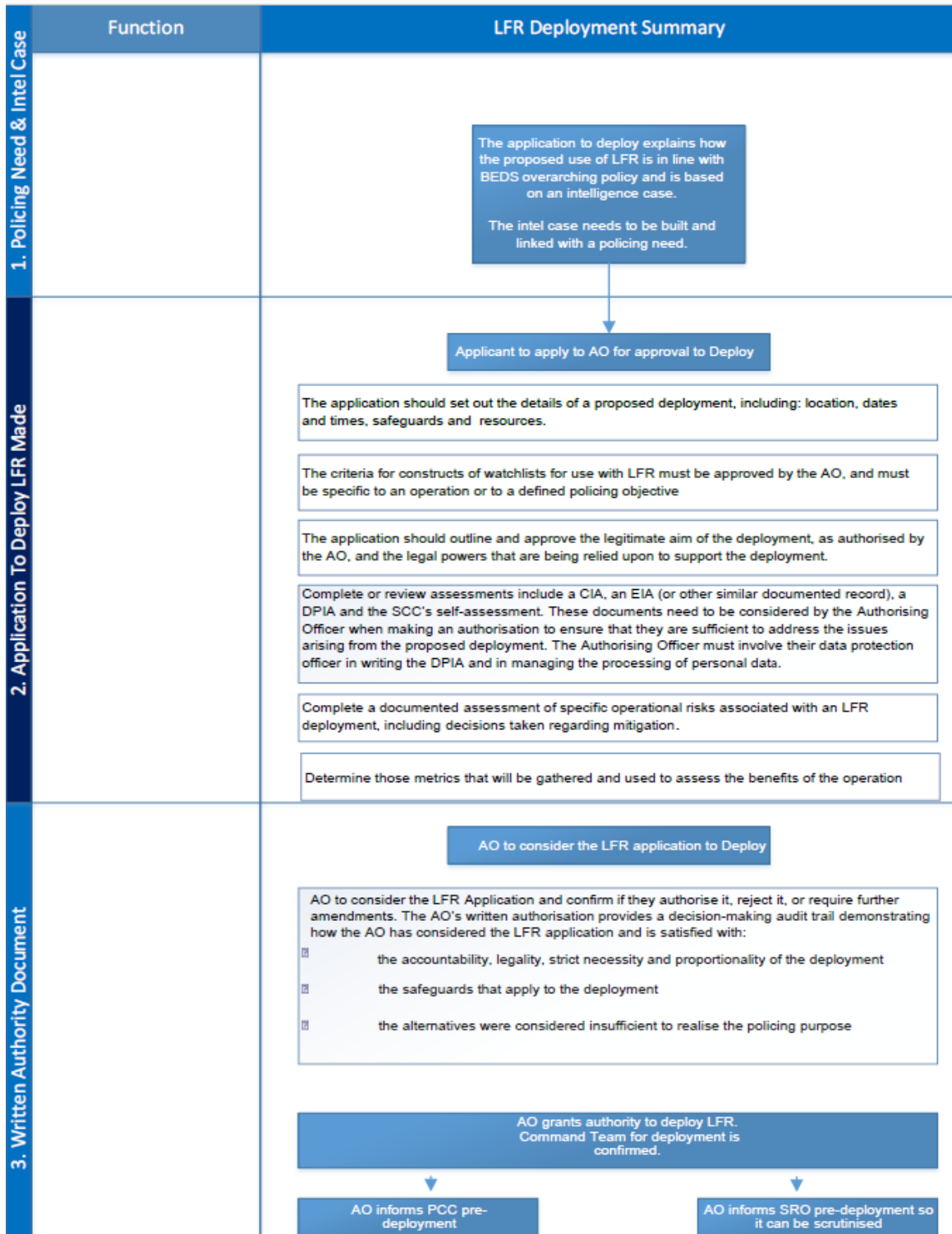
11 Post-Deployment

- 11.1 Following each LFR Deployment, the Silver Commander must ensure that a post Deployment evaluation is completed which is updated in the Deployment Record. The evaluation process must capture an assessment of the operational effectiveness of the LFR Deployment. This evaluation should be both qualitative and quantitative in nature.
- 11.2 The evaluation should clearly articulate what measures are used to assess effectiveness and what benchmarking criteria are used. It should also assess the effectiveness of the safeguards used for the Deployment and what opportunities exist to improve them for future use, and how learning will be shared.
- 11.3 The evaluation may include as many measures as appear appropriate, but as a minimum must include the following metrics (including what methods were used to obtain them):-
- a) total number of individuals and the total number of images included in the Watchlist (there may be multiple images of some individuals); and
 - b) total number of facial images detected in the video stream that were of sufficient quality for searching against the Watchlist (i.e. the LFR application was able to generate a Template from them); and
 - c) total number of LFR application-generated Alerts; and
 - d) total number of Alerts that do not result in an Engagement; and
 - e) total number of Alerts where a decision was taken to Engage an individual; and
 - f) total number of Alerts that are confirmed as true alert (the individual is who the LFR application suggests are); and
 - g) total number of Alerts that are confirmed as a false alert (the individual is not who the LFR application suggests they are); and
 - h) total number of correct Alerts that result in an Engagement that do not require any further police action; and
 - i) outcome of each case where police action is instigated following an Alert; and
 - j) number of people Engaged, where the Engagement was not the result of Alert, including the reasons and outcome.

12 LFR Deployment Summary Flowchart

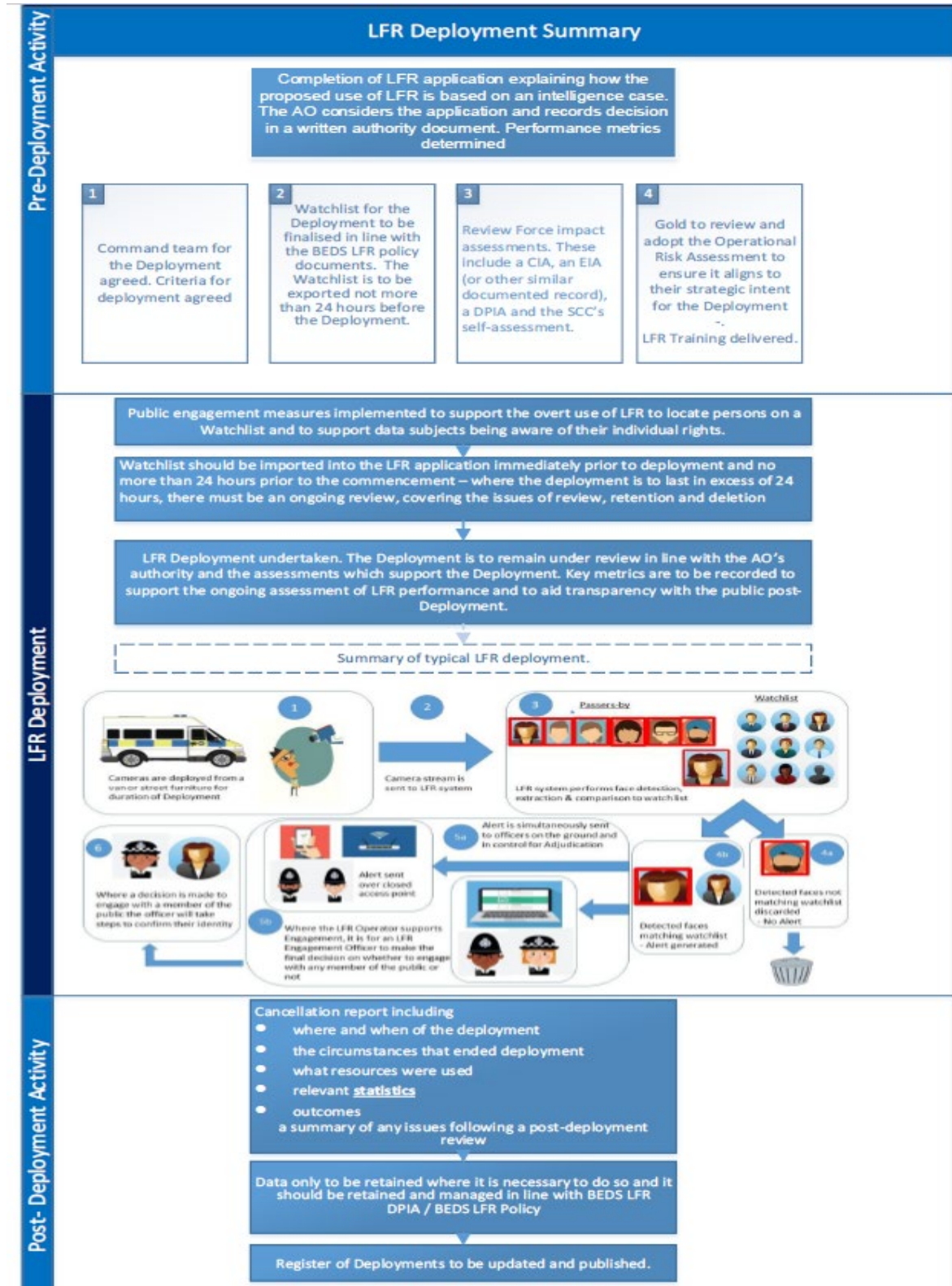


Beds LFR
Flowchart.pdf





Beds LFR Deployment Diagram.pdf



13 LFR Application Security

13.1 The LFR application includes a number of physical and technical security measures. These include:-

- a) images are transferred onto the LFR application via an encrypted USB device or via a secure Connection to a Virtual Private Network; and
- b) the LFR application is a fully-closed system with two layers of password protection to access the application; and
- c) the LFR application is physically protected when in use and deployment data stored on the system is securely wiped following each Deployment; and
- d) role based access controls with limited user permissions are implemented on the LFR application; and
- e) the LFR application can be 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; and
- f) the Dashboard and RESTful API are secured with SSL and TLS by default; and all connections are directed through HTTPS; and
- g) a full audit is maintained of all user initiated actions undertaken during the course of a Deployment; and
- h) technical issues with the LFR application are always dealt with by LFR System Engineers deployed on the operation.

14 Data Retention & Data Management

14.1 Beds must ensure that the processing of any data associated with LFR is conducted in a lawful way and in compliance with the Beds LFR Documents. This means that:-

- a) where the LFR application does not generate an Alert, that a person's biometric data is immediately automatically deleted; and
- b) the data held on the encrypted USB memory stick used to import the Watchlist is deleted as soon as practicable, and in any case within 24 hours, following the conclusion of the Deployment.

14.2 Where the LFR application generates an Alert, all personal data is deleted as soon as practicable and in any case within 24 hours.

14.3 All CCTV footage generated from LFR Deployments is deleted within 31 days, except where retained:-

- a) In accordance with the Data Protection Act 2018, MOPI and the Criminal Procedures and Investigations Act 1996; and /or
- b) In accordance with Beds complaints / conduct investigation policies.
- c) To support compliance the LFR application has a full audit capability, and the LFR Operator and LFR Engagement Officer log is retained in line with MOPI retention periods.
- d) The loss or theft of any LFR hardware (laptop, mobile device, camera etc.) or other data, irrespective of whether or not protected by encryption, must be reported immediately to the AO, Gold, and the SWP Data Protection Officer.

Register of Deployments

Any Deployment of LFR must be recorded on a centrally held register. This register will record a number of things including:-

- a) name and rank of the AO and command team; and
- b) date, time, duration, and locality of Deployment; and
- c) Watchlist composition statistics (not including any personal data); and
- d) the number of Alerts and the various statistics relating to these; and
- e) number of Engagements and their results;

14.7 Beds will make information relating to LFR Deployments available to the public in accordance with the Beds LFR Documents.

15 Further Documentation

15.1 Further documentation is available providing useful information relevant to LFR. This is detailed below.

- a) Information Management APP;
www.college.police.uk/app/information-management
- b) National Decision Model; <https://www.college.police.uk/app/national-decision-model>
- c) National Intelligence Management;
www.college.police.uk/app/intelligence-management

d) College of Policing Code of Ethics;
www.college.police.uk/ethics/code-of-ethics

e) Home Office Biometric Strategy – Published June 2018;
www.gov.uk/government/publications/home-office-biometrics-strategy

f) High Court Ruling – R (on the application of Edward Bridges) v
The Chief Constable of South Wales [2019] EWHC 2341 (Admin);
www.judiciary.uk/judgments/r-v-the-chief-constable-of-south-wales-police-and-others/

Revision History.

Date	Revision	Change	Section	Review Date