



Jo Farrell  
Chief Constable  
Police Scotland

Fiona McQueen CBE  
Chair  
Scottish Police Authority

By email

6<sup>th</sup> October 2025

Re: Live facial recognition

Dear Ms. McQueen and Chief Constable Farrell,

I write regarding the decision to move ahead with the use of Live Facial Recognition technology by law enforcement in Scotland.

As we have set out previously, facial recognition technology (FRT) for identification purposes involves the widespread and bulk monitoring, collection, storage and analysis of biometrics-based identification at scale, without consent, and without reasonable suspicion. It is a mode of mass surveillance both by design, and in its deployment, and as such a violation of the right to privacy, non-discrimination and peaceful assembly, among other rights.

At the point of deployment, we have seen that the technology is massively invasive and erodes civic spaces. Around the world FRT has been found to significantly hamper the right to peaceful protest, through its usage against protesters, or other individuals that are identified as threats. Amnesty's research has demonstrated that oftentimes those individuals and communities tend to be from some of the most marginalised groups and FRT can have a disproportionate impact on Black and Brown people, undermining the right to equality and non-discrimination.

In short, facial recognition is not compatible with Scotland's International human rights obligations. We already have concerns about Police Scotland's use of retrospective facial searches of national databases. Instead of pursuing plans to introduce live facial recognition – Police Scotland, the SPA and the Scottish Government should be working to ensure technologies of mass surveillance are never deployed in Scotland.

Where it is used elsewhere in the UK, live facial recognition has been subject to legal challenge. In 2020, the Court of Appeal found that South Wales Police's use of facial recognition technology breaches privacy rights, data protection laws and equality laws. The Metropolitan Police is currently facing legal action after Shaun Thompson, an anti-knife crime activist, was misidentified by the technology and wrongly flagged as a criminal.



Research platformed at your May conference claiming the Metropolitan Police had successfully reduced the bias present in LFR, has been criticized for its lack of scientific efficacy. Assertions minimising concerns around bias and inaccuracy in the technology should be treated cautiously by Police Scotland and the SPA going forward.

As raised in our letter to DCS McCreadie following the SPA's 'national conversation' conference, we already have serious concerns about Police Scotland's use of retrospective facial searches. The Biometrics Commissioner's finding that Police Scotland's retrospective searches of national databases are not monitored seriously damages the credibility of assurances around future use of live facial recognition technology.

We believe that the evidence is clear – live facial recognition has no place in Scotland. It's introduction would represent a fundamental shift in the relationship between the public and law enforcement and pose a grave threat to the rights and freedoms of the Scottish public. It is deeply disappointing that warnings from equalities and human rights organisations not to proceed with these plans, made in the context of a major ongoing legal challenge, have been ignored.

The implications of the decision to move forward with LFR should not be downplayed or under-estimated. It's adoption would represent a historic shift in the relationship between Police Scotland and the public.

I urge you to reconsider your decision to move ahead with the development of plans to introduce LFR to Scottish policing. At a minimum, the SPA must publish a written update for the public, civil society and parliamentarians providing a detailed overview of these plans to date, including information on what formal evaluation and impact assessment has been completed of their compatibility with statutory equalities and human rights duties.

In line with its duties to hold Police Scotland to account, the SPA must also mandate a review of the force's existing use of retrospective facial searches on human rights grounds.

I look forward to your response.

Yours sincerely,

Liz Thomson

Acting Scotland Programme Director  
Amnesty International UK