

Angela Constance MSP
Cabinet Secretary for Justice and Home Affairs
The Scottish Government

By email

6th October 2025

Dear Cabinet Secretary,

Please find enclosed a letter from Amnesty International to Police Scotland and the Scottish Police Authority regarding the decision to move ahead with the use of Live Facial Recognition technology (LFR) by law enforcement in Scotland.

As set out, Amnesty firmly opposes the use of LFR by Police Scotland. Facial recognition technology is a mode of mass surveillance and is not compatible with Scotland's human rights obligations. We also have concerns about the force's retrospective facial searches of national databases.

It is Amnesty's position that plans to use LFR in Scotland should be dropped entirely. However, in light of the decision to move ahead, we have written to the Chief Constable and SPA Chair to request the publication of a written update for the public, civil society and parliamentarians which provides a clear and detailed overview of Police Scotland's plans, including information on what formal assessment of the compatibility of those plans with statutory equalities and human rights duties has taken place.

The implications of the decision to move forward with LFR should not be underestimated. Adoption of the technology would represent a historic shift in the relationship between Police Scotland and the public.

I urge you to hold the SPA accountable for its duties under human rights and equalities legislation and support our call for plans to introduce live facial recognition to be dropped.

I am also asking you to explore approaches to prohibiting the use of live facial recognition on a statutory basis. Amnesty wants to see a ban on this technology in Scotland and globally. This matter cannot be left to Police Scotland and the SPA – as Justice Secretary you have a pivotal role to play in ensuring that law enforcement works in accordance with its human rights obligations.



I look forward to your response.

Yours sincerely,

Liz Thomson

Acting Scotland Programme Director
Amnesty International UK