



HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

Response Date:13/02/2025

2025/115 - Facial Recognition and Minors

In response to your recent request for information regarding;

This is a request under the Freedom of Information Act for information regarding your force's use of Facial Recognition Technology, Retrospective Facial Recognition and the Police National Database (PND). Please provide the following information about your force's use of Facial Recognition Technology, Retrospective Facial Recognition and the Police National Database (PND) for the periods between January 2024 and today's date; if you do not hold this information for the whole length of the period stated above, please provide it for the period starting from the date you began recording the information:

1. The processes (if any) undertaken by your force when using the Police National Database's face search capability to identify children (minors under the age of 18).

No deviation from the process used for all Facial Search request – 'policing purpose'.

2. If there is a Child Rights Impact Assessment for the use of:

a. The Police National Database (PND) - No

b. Facial Recognition Technology – N/A

c. Retrospective Facial Recognition Technology – N/A

3.The number of times Facial Recognition Technology, Retrospective Facial Recognition Technology and/or the Police National Database were used to identify children (minors under the age of 18). – the age of the person in the image to be searched is immaterial and not recorded because their details (including age) are unknown at the time of the search. As a consequence we do not record the number of times searches are undertaken on images believed to depict children or young persons.

4. The following information about each search: see above, which negates the need to answer the below

reason for search – mandatory field with 11 categories depending on the nature of the investigation

officer defined ethnicity – not recorded

self-defined ethnicity – not recorded

gender of the person searched – can be recorded within PND as part of search criteria but not required

age of person searched – not required

response (i.e., whether the search returned a record and led to an arrest) – will either be No matches/Failed/Potential match

5. Are CCTV images used during facial recognition checks which utilise the PND? If so, please share the number of times CCTV images were used for facial recognition checks

6. Are CCTV images and footage retained on the Force Video management system, including those which depict children under the age of 16 and under the age of 18?

– the source of the 'probe' images uploaded to PND for facial search is not required nor recorded

7. Are images or data from facial recognition searches (in particular of minors under the age of 18) shared with other agencies or private organisations? If so, under what conditions? All potential matches are 'intelligence only' and will be treated accordingly by the investigating officer.

8. If your force does not currently use Facial Recognition Technology, retrospective Facial Recognition and/or the Police National Database (PND) please state if there are there plans to.

We currently use PND facial search and [Live Facial Recognition | North Wales Police](#)

The responses provided are in relation to overt use, North Wales Police can neither confirm nor deny that it holds any information in relation to the covert practice of facial recognition as the duty in Section 1(1)(a) of the Freedom of Information Act 2000 does not apply by virtue of the following exemptions:

Section 24(2) National Security

Section 31(3) Law Enforcement

With Sections 24 and 31 being prejudice based qualified exemptions, there exists the requirement to articulate the harm that would be caused in confirming or not whether information is held as well as carrying out a public interest test.

Evidence of Harm

Any disclosure under FOI is a release to the public at large. Whilst not questioning the motives of the applicant, confirming or denying that any other information relating to the covert practice of facial recognition is held would show criminals what the capacity, tactical abilities and capabilities of the force are, allowing them to target specific areas of the UK to conduct their criminal/terrorist activities. Confirming or denying information is held regarding the specific circumstances in which the Police Service may or may not deploy the use of facial recognition would lead to an increase of harm to covert operations and compromise law enforcement. This would be to the detriment of providing an efficient policing service and a failure in providing a duty of care to all members of the public.

The threat from terrorism cannot be ignored. It is generally recognised that the international security landscape is increasingly complex and unpredictable. Since 2006, the UK Government has published the threat level, based upon current intelligence and that threat is currently categorised as 'substantial', see below link:

<https://www.mi5.gov.uk/threat-levels>

The UK continues to face a sustained threat from violent extremists and terrorists. It is well established that police forces use covert tactics and surveillance to gain intelligence in order to counteract criminal behaviour. It has been previously documented in the media that many terrorist incidents have been thwarted due to intelligence gained by these means.

Public Interest Test

Factors favouring confirmation or denial – Confirming or denying any further information is held would allow the public to see where public funds have been spent and allow the Police service to appear more open and transparent. Disclosure of information, if held, would demonstrate that the force is reviewing all contingencies to ensure that it continues its robust fight against all types of criminal activity.

Factors against confirmation or denial -

Confirming or denying whether any other information is or isn't held relating to the covert use of facial recognition technology would limit operational capabilities as criminals/terrorists would gain a greater understanding of the police's methods and techniques, enabling offenders to take steps to counter them. It may also suggest the limitations of police capabilities in this area, which may further encourage criminal/terrorist activity by exposing potential vulnerabilities. This detrimental effect is increased if the request is made to several different law enforcement bodies. In addition to the local criminal fraternity now being better informed, those intent on organised crime throughout the UK will be able to 'map' where the use of certain tactics are or are not deployed. This can be useful information to those committing crimes. It would have the likelihood of identifying location-specific operations which would ultimately compromise police tactics, operations and future prosecutions as criminals could counteract the measures used against them.

Balance Test

Any information identifying the focus of policing activity could be used to the advantage of terrorists or criminal organisations. Information that undermines the operational integrity of these activities will adversely affect public safety and have a negative impact on both National Security and Law Enforcement.

Therefore, for these issues the balancing test for confirming or denying whether any further information is held, is not made out.

Therefore, in accordance with the Freedom of Information Act 2000, this letter acts as a Refusal Notice under section 17 (1) of the legislation.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 03/02/2025