



Your reference: n/a

Our reference: FOI_25_0086

E-mail: FOI
@gloucestershire.police.uk

Direct dial: 01452 754304

Postal Address: As above

Date: 19/02/2025

Dear

Gloucestershire Constabulary Freedom of Information request FOI_25_0086

On 23/01/2025 you sent an email constituting a request under the Freedom of Information Act asking the following:

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).
2. If there is a Child Rights Impact Assessment for the use of:
 - a. The Police National Database (PND)
 - b. Facial Recognition Technology
 - c. Retrospective Facial Recognition Technology
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).
4. The following information about each search:
 - a. date
 - b. reason for search
 - c. officer defined ethnicity
 - d. self-defined ethnicity
 - e. gender of the person searched
 - f. age of person searched
 - g. response (i.e., whether the search returned a record and led to an arrest)

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?
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?
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.

Under the Freedom of Information Act 2000 s1, I can confirm that Gloucestershire Constabulary may hold some relevant information.

Unfortunately, it's not possible to electronically search for the information you have requested.

There is no way of electronically retrieving statistics relating to questions 3, 4 and 5. There is limited reporting functionality relating to any searches on the Police National Database and would require all searches to be manually reviewed to ascertain what information is held relevant to the request.

As this would involve manually reviewing hundreds of records, this would clearly take far longer than the 18 hours prescribed by Section 12 of the Freedom of Information Act.

Please see below for suggestions on how you may be able to refine your request to come within the cost constraints of Section 12 of the Act.

Section 17(5) of the Freedom of Information Act 2000 requires Gloucestershire Constabulary, when refusing to provide information (because the information is exempt) to provide you the applicant with a notice which: (a) states the fact, (b) specifies the exemption in question and (c) states (if not otherwise apparent) why the exemption applies.

In relation to your request Section 12 applies.

Section 12(1) – Fee Regulations states:

Section 1(1) of the Act does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit. (As detailed in the Data Protection and Freedom of Information Fees Regulations of 2004)

The appropriate limit at the moment is £450 calculated at an hourly rate of £25 per hour for all staff time incurred in:

- i. Determining whether information is held
- ii. Locating it
- iii. Retrieving it
- iv. Extracting the information to be disclosed from the other information.

In accordance with the Act, this letter represents a Refusal Notice for your request.

Under Section 16, duty to assist, I can confirm that if you omit questions 3, 4 and 5 we may be able to action your request. If this would still be useful, please submit a new request to foi@gloucestershire.police.uk Please note that the response may be subject to exemptions.

If you are not satisfied with this response or any actions taken in dealing with your request, you have the right to ask that we review your case under our internal procedure. Please note that a request for an internal review must be made within 20 working days of the response to your original request.

If you decide to request that such a review is undertaken and following this process you are still unsatisfied, you then have the right to direct your complaint to the Information Commissioner for consideration.

The Information Commissioner can be contacted via the following means:

Website - <https://ico.org.uk/>

Call their helpline - 0303 123 1113

Email - casework@ico.org.uk

Post –

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Yours sincerely,

Disclosure Officer
Gloucestershire Constabulary