

# MPS Live Facial Recognition

1. Policing Need & Intel Case	MPS LFR summary process for a stand-alone deployment	Key MPS LFR Document References
	<p>Applicant identifies a policing need which LFR has the potential capability to meet in line with the MPS Objectives for LFR use and Met Direction.</p> <p>Intelligence case commissioned in relation to the policing need – the intelligence case will inform the LFR planning process and ensure the use of LFR is intelligence-driven.</p>	<ul style="list-style-type: none"> <li>Policy: Section 5.</li> <li>Legal Mandate: Section 2</li> <li>Policy: Section 6.1</li> <li>SOP: Section 5 and .6</li> <li>MPS LFR Form 3: Intelligence Case</li> </ul>
	<p>Applicant to apply to AO for approval to Deploy</p>	<ul style="list-style-type: none"> <li>MPS LFR Form 1, Part 1: Application</li> </ul>
2. Application To Deploy LFR Made	<p>1 Location, date, time, rationale to be defined. If the location raises higher expectations of privacy this is to be explained and any additional safeguards / mitigations outlined</p> <p>2 Legal basis and legitimate aim to be defined. Applicant to explain how the Deployment will achieve the legitimate aim(s) informed by the intelligence case.</p> <p>3 ECHR Articles engaged to be specified. This will include Art. 8 and may include 9, 10, 11 &amp; 14. - Data protection grounds (Schedule 8) for sensitive processing to be identified.</p> <p>4 Necessity case articulated – why is it necessary to achieve the legitimate aim in a democratic society and why is the processing of data is strictly necessary? - Pressing social need to be identified</p> <p>5 Proportionality case to be articulated. To include the importance of the objective, alternatives, public awareness steps and other deployment-specific measures to ensure the least possible intrusion.</p> <p>6 Watchlist composition to be proposed and how its construction is supported by the intelligence case explained. The necessity and proportionality for the Watchlist composition is to be detailed.</p> <p>7 Watchlist composition regarding under 13 and 18, the disabled, gender transition and any use of non-police originated images to be detailed, supported by a rationale for AO's consideration.</p> <p>8 Compliance with the MPS LFR Documents to be confirmed / explained for the AO's consideration. DPIA, EIA, CIA, any supporting legal advice and technical advice to be submitted to AO</p>	<ul style="list-style-type: none"> <li>SOP: Section 5. <span style="float: right;">1</span></li> <li>Legal Mandate: Section 3.8 and 3.10 – 3.12</li> <li>Legal Mandate: Sections 1.1 – 3.9 <span style="float: right;">2</span></li> <li>Policy: Section 5</li> <li>Legal Mandate: Sections 3 and 5 <span style="float: right;">3</span></li> <li>DPIA <span style="float: right;">4</span></li> <li>Legal Mandate: Section 3 <span style="float: right;">5</span></li> <li>Policy: Section 4.10</li> <li>SOP: Section 5</li> <li>Legal Mandate: Section 3 <span style="float: right;">6</span></li> <li>Policy: Sections 5.5, 10.3 to 10.8 <span style="float: right;">7</span></li> <li>SOP: Section 6</li> <li>Legal Mandate: Section 3 <span style="float: right;">8</span></li> <li>Policy: Sections 4 - 6</li> <li>SOP: Section 6</li> </ul>
3. Written Authority Document	<p>AO to consider the LFR application to Deploy</p> <p>AO to consider the LFR Application and confirm if they authorise it, reject it, or require further amendments. The AO's role will include recording a decision for LFR Document compliance, (ii) Legitimate Aim, (iii) Human Rights – Necessity, (iv) Data Protection – Necessity, (v) Proportionality, (vi) Watchlist Composition, and (vii) Deployment location and times.</p> <p>The AO will provide a high degree of scrutiny to any proposals for Watchlists which include those under 13 or 18, the disabled, gender transition or the inclusion of non-police originated images and any proposal to deploy which raises elevated privacy concerns.</p> <p>AO to review and adopt (amending where necessary and appropriate) the DPIA, EIA, the SCC Self-Assessment.</p> <p>AO to review the Community impact Assessment particularly in the context of Watchlist composition and those likely to pass the LFR system.</p> <p>AO to engage with SRO, DPO, DLS, CPIE Engagement Team and Technical as necessary to seek advice to inform their decisions. .</p> <p>AO to direct Police Officers and Staff engaged in the Deployment to receive MPS LFR Training.</p> <p>AO to engage with an officer of NPCC rank to ensure strategic issues from a pan-London perspective are considered</p> <p>AO grants authority to deploy LFR.</p> <p>AO to confirm the LFR Gold for the Deployment. The Gold appoints the remainder of the Deployment command structure.</p>	<ul style="list-style-type: none"> <li>MPS LFR Form 1, Part 2: Written Authority Document</li> <li>Policy: Section 4 regarding Urgency</li> <li>An AO must be very familiar with the MPS LFR Documents in order to provide a high degree of scrutiny when considering an LFR application.</li> <li>The AO may be guided to particularly relevant sections of the MPS LFR documents by reference to those highlighted above for the MPS LFR application.</li> <li>Policy: Section 7.5</li> <li>Policy: Sections 5.1, 7.3 – 7.6</li> <li>SOP: Sections 4, 10.1 – 10.2</li> </ul>

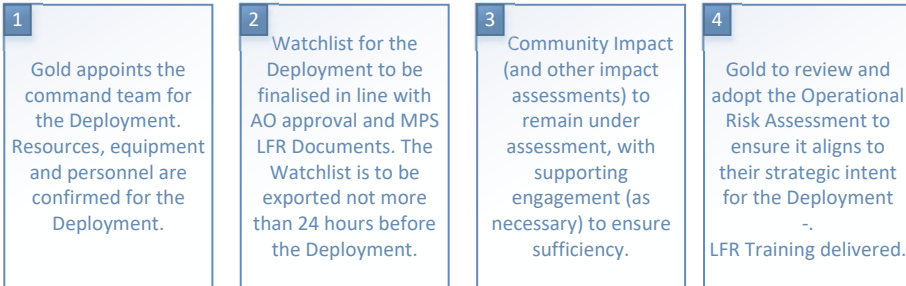
# MPS Live Facial Recognition ... cont.

## 4. Pre-Deployment Activity

### MPS LFR summary process for a stand-alone deployment

### Key MPS LFR Document References

Pre-Deployment activity undertaken under the direction of Gold to implement the AO's authority to Deploy.



- Policy: Section 7  
• SOP: Sections 7 - 10 1
- Policy: Section 10  
• SOP: Section 6 2
- Policy: Section 7  
• SOP: Sections 7 and 10 3
- 4

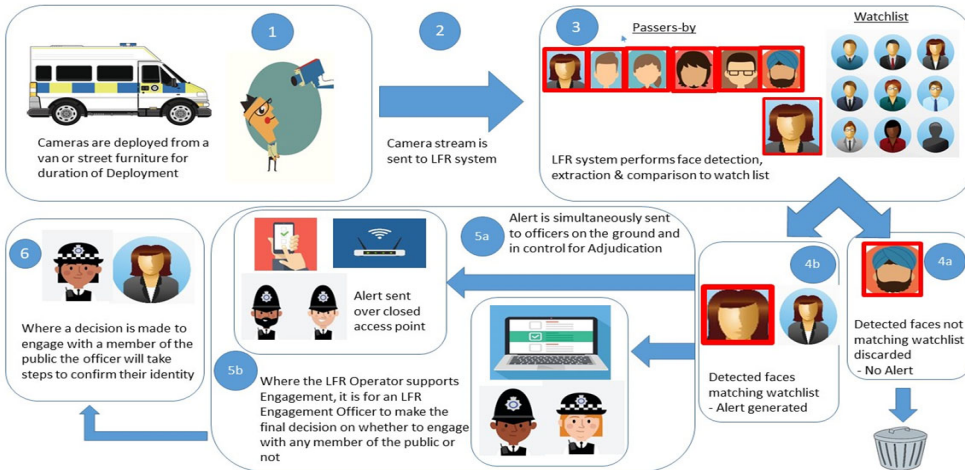
## 5. LFR Deployment

Public engagement measures implemented to support the overt use of LFR to locate persons on a Watchlist and to support data subjects being aware of their individual rights.

Watchlist imported into LFR system. LFR Cameras established, roles confirmed and personnel deployed.

LFR Deployment undertaken. The Deployment is to remain under review in line with the AO's authority, the MPS LFR Documents and the assessments which support the Deployment. Key metrics are to be recorded to support the ongoing assessment of LFR performance and to aid transparency with the public post-Deployment.

A summary of how the LFR process works in relation to an individual passing the LFR system



- Policy: Section 9  
• SOP: Sections 5.7 -5.8
- Policy: Sections 10 and 12  
• SOP: Section 6 and 10
- Those responsible for the Deployment need to have familiarity with the MPS LFR Documents. Particularly relevant are:  
• Policy: Sections 7, 9.5 and 13  
• SOP: Sections 10 and 11.3

## 6. Post-Deployment Activity

Gold to ensure a post-Deployment evaluation is completed with a Cancellation Report being produced. This supports the capture of learning for future deployments and helps inform activity to ensure ongoing measures to assure the performance of the algorithm.

Data only to be retained where it is necessary to do so and it should be retained and managed in line with MPS LFR Documents.

Register of Deployments to be updated and published.

- MPS LFR Form 1, Part 3: Cancellation Report  
• Policy: Sections 7, 10.9 – 10.14 and 11
- Policy: Section 7  
• SOP: Section 13  
• Legal Mandate: Section 5  
• DPIA
- Policy: Section 9.6  
• SOP: Section 13