

Nottinghamshire Police Headquarters,
Sherwood Lodge Drive,
Nottingham, NG5 8PP

By email only

19 August 2026

Detective Superintendent Henley,

We are writing to you as a coalition of human rights, racial justice, children's rights and civil liberties groups, who are concerned about the proposed roll-out of live facial recognition technology by Nottinghamshire Police Force. We urge you to halt your plans to deploy this intrusive technology.

Your press release states that "Facial recognition is just another tool to fight crime."¹ However, live facial recognition ("**LFR**") software used in public spaces is an incredibly intrusive biometric mass surveillance technology. It does not just affect the rights of people sought by the police. As the software scans the faces of everyone who walks past the camera and takes biometric face prints, it engages the privacy rights of millions of innocent members of the public. It is an important principle of policing that law-abiding citizens should not be subject to surveillance absent suspicion; LFR turns that presumption on its head, treating everyone as a suspect by default.

You suggest that "If you aren't entering the city or county to commit crime then you have nothing to worry about." However, many law-abiding citizens have legitimate concerns about the roll-out of invasive facial recognition technologies. If LFR becomes a part of daily life, it will have a devastating effect on privacy, free expression and freedom of assembly. A public that cannot move around their towns and cities without being subjected to a biometric identity check may be less willing to seek medical care or legal advice, speak with journalists, act in a union, vote, protest or express their gender, sexual or religious identity. Whilst Nottinghamshire Police may not retain the biometric data in databases, the privacy intrusion has already occurred at the point the scan is processed, giving rise to the associated chilling effects on our ability to exercise our democratic rights and freedoms.

We are particularly concerned to learn that Nottinghamshire Police could deploy LFR to tackle low level crimes, such as youth anti-social behaviour, as part of Operation View.

¹ Nottinghamshire Police Press Release: 'Police deploy facial recognition technology to help identify criminals and safeguard vulnerable people,' 28 July 2026, <https://www.nottinghamshire.police.uk/news/nottinghamshire/news/news/2026/july/police-deploy-facial-recognition-technology-to-help-identify-criminals-and-safeguard-vulnerable-people/>.

Reporting suggests that the force already possesses “a watchlist of young people believed to be causing the most problems,” including children as young as 11 years old.² It would be highly disproportionate to deploy live facial recognition to tackle this behaviour. Many of these children are reportedly known to the police, and it is highly likely that there are more proportionate means for locating them.

We are also concerned that you have not adequately examined the distinct risks of using LFR to target children in terms of their behaviour and outcomes, risk of recidivism, and relationship with the police. It is possible that the use of LFR could exacerbate behavioural problems in children and create an adversarial rather than trusting relationship with the police from a young age. Professors Pete Fussey and Daragh Murray, who independently examined the Metropolitan Police’s use of LFR, have highlighted how the stop of a 14-year old child during a LFR deployment in Romford caused the boy to be “visibly distressed and clearly intimidated.”³ The child had been misidentified by the LFR system. Nottinghamshire Police does not appear to have conducted any consultation with children’s rights groups to understand the implications of deploying LFR and adding children to watchlists, despite the unique risks to this cohort.

Your force’s planned use of LFR is highly likely to be opposed by many members of the public in the area. Recent polling commissioned by Liberty indicated that 48% of people oppose scanning the faces of those walking on high streets when there is no suspected imminent threat.⁴ Further, polling suggests that the public are less comfortable with the police using LFR to target children. For example, a recent poll conducted by Opinium found that the majority of people oppose the use of facial recognition in schools.⁵ Young people themselves also experience particular unease around the use of this intrusive surveillance technology. A report by the London Policing Ethics Panel found that Londoners aged 16-24 were most likely to find the Metropolitan Police Service’s use of LFR unacceptable and most likely to stay away from events where LFR was in use.⁶ Policing is supposed to make people of all ages feel able to safely enjoy public spaces – not to make people fearful and anxious in them.

2 LBC, ‘Police to use facial recognition in Nottingham crackdown on anti-social youths’, 29 July 2026, https://www.lbc.co.uk/article/police-to-use-facial-recognition-in-nottingham-5HjdfHG_2/.

3 Fussey and Murray, Facial Recognition Surveillance: Policing and Human Rights in the Age of AI, Oxford University Press, 2025, p262.

4 Guardian, ‘Live facial recognition cameras to be used on UK’s busiest shopping street’, 12 August 2026, <https://www.theguardian.com/world/2026/aug/12/live-facial-recognition-cameras-oxford-street>.

5 Talking Retail, ‘Just over half of UK adults back use of facial recognition technology in retail’, 10 June 2026, <https://www.talkingretail.com/featured/just-over-half-of-uk-adults-back-use-of-facial-recognition-technology-in-retail-10-06-2026/>.

6 London Policing Ethics Panel, Final Report on Live Facial Recognition, May 2019, http://www.policingethicspanel.london/uploads/4/4/0/7/44076193/live_facial_recognition_final_report_may_2019.pdf. pp 20, 24.

In other democratic countries, such as those in the EU, legislators have taken steps to restrict the deployment of LFR to only the most serious and time-sensitive circumstances with an additional requirement for judicial authorisation. Targeting children for low-level crimes would be a significant departure from this approach. Given the risks it poses to our rights and freedoms, LFR should not be a tool for routine, everyday policing.

Finally, Nottinghamshire Police should refrain from using LFR at least until a specific legal framework is in place, which the Government has finally committed to introducing through the Police Reform Bill. In the absence of specific legislation regulating LFR, Parliament has not had the opportunity to properly scrutinise, debate, authorise or limit its use. Instead, police forces are currently relying on a patchwork of non-specific legislation and common law powers.⁷ This is incompatible with the rule of law, which requires laws to be clear and accessible to the public. As a Government Minister acknowledged, the legal framework would introduce “proper governance, proper accountability, and a clear understanding of what, where and how facial recognition technology can be used.”⁸ Until these protections are in place, the public cannot reasonably be expected to have any trust or confidence in the deployment of the technology.

The absence of national legislation has resulted in rights abuses, including breaches to privacy rights, data protection laws and equality laws.⁹ This legal vacuum has also left police forces vulnerable to lengthy, costly and high-profile litigation; where children are included on watchlists, the likelihood of legal challenge only increases.

We urge you to halt Nottinghamshire Police’s plans to use live facial recognition surveillance any further, at least until Parliament has legislated and there are sufficient safeguards in place to protect the rights of the public.

We look forward to hearing from you.

Yours sincerely,

Silkie Carlo, Director, Big Brother Watch
Jen Persson, Director, Defend Digital Me

⁷ Nottinghamshire Police LFR Legal Mandate, 1 March 2026, <https://www.nottinghamshire.police.uk/SysSiteAssets/media/downloads/nottinghamshire/misc/facial-recognition---legal-mandate.pdf>

⁸ HL Debate, Vol 854, 1 July 2026, <https://hansard.parliament.uk/Lords/2026-07-01/debates/C6D46C8A-71EC-4DB8-896C-AFF820C7291C/CounterterrorismAiAndFacialRecognition#contribution-2A061A32-A73A-4CB3-A9B0-BFF278B8CE0B>.

⁹ Liberty, Legal Challenge: Ed Bridges v South Wales Police, <https://www.libertyhumanrights.org.uk/issue/legal-challenge-ed-bridges-v-south-wales-police/>.

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