

From: icocasework@ico.org.uk  
To: dpo@essex.police.uk;  
CC:  
Subject: Your email to the ICO - Case Reference IC-266393-T8F9  
Direction: Outgoing  
Date Sent: 26/10/2023 13:26

26 October 2023

Our reference: IC-266393-T8F9

Dear M Watson,

Thank you for your email of 20 October 2023.

Thank you for your email regarding the organisations use of facial recognition technology. As you have stated, the organisation has determined this incident does not formally meet the threshold to report this to the ICO, but this information has been logged under the above case reference number.

I would like to take this time to promote our [guidance and resources](#) in relation to this topic that you may find useful to ensure the processing of said information is done so compliantly. If you do have any questions in relation to this guidance, please don't hesitate to ask.

Additionally, I have passed your enquiry to other departments within the ICO for consideration. If they find it appropriate, they may contact you directly for further discussions on this topic.

Did you know, most companies need to pay a [data protection fee](#)? Don't fall short of data protection compliance – our [online fee checker](#) will help you figure out if you need to pay, or if you're exempt.

I hope this information is helpful to you. If you would like to discuss this further, please contact me on my direct number 0330 414 6169. If you need advice on a new issue, you can [contact us](#) via our Helpline on 0303 123 1113 or through our live chat service. In addition, more information about the Information Commissioner's Office and the legislation we oversee is available on our website [ico.org.uk](#).

Yours sincerely

Mitchell Bailey  
Lead Case Officer  
Information Commissioner's Office

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF  
T. 0330 414 6169 [ico.org.uk](#) [twitter.com/iconews](#)  
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----- Original Message -----

External: This email originated outside the ICO.  
Good afternoon ICO,

My name is Michelle WATSON and I am the Data Protection Officer for Essex Police. Further to my phone call to the helpline this morning this email is a courtesy email to advise you that Essex Police have applied through the Mutual Aid process with our colleagues in South Wales Police to trial the use of Live Facial Recognition deployment on Tuesday 24<sup>th</sup> and Wednesday 25<sup>th</sup> October 2023. Whilst the deployment is a trial in the use of the technology from an operating perspective we recognise there is no such thing as a trial in the processing of personal data in this way and as such in preparing for the trial, we have taken into account not only the relevant DP legislation and the Bridges judgment but also the Information Commissioners Opinion: The use of live facial recognition technology by law enforcement in public places (2019), the College of Policing Authorised Professional Practice on Live Facial Recognition (including the Biometrics and Surveillance Commissioners response to the APP), and all of the experience and information from our colleagues at South Wales Police, MET Police and Northants Police in relation to their lessons learned.

All of our required publications can be located on [Live facial recognition | Essex Police](#). This has been advertised on our social media channels for public knowledge also. In producing all the relevant documentation and assessing the use of LFR via the DPIA process we have not assessed any residual high risk processing issues; however, we are acutely aware of how significant LFR is in the consciousness and concerns of the public that we believe it appropriate to notify you of the deployment.

I hope this is all you need however if you require anything further, please do not hesitate to contact me.

Kind regards,

**Michelle WATSON 7371 | Force Data Protection Officer | Professionalism Command**

Email: [DPO@essex.police.uk](mailto:DPO@essex.police.uk) | [REDACTED]  
[REDACTED]

Kind regards,

**Michelle WATSON 7371 | Force Data Protection Officer | Professionalism Command**

Email: [DPO@essex.police.uk](mailto:DPO@essex.police.uk) | [REDACTED]  
[REDACTED]

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