



The Scottish Parliament
Pàrlamaid na h-Alba

Information Management and Governance
Scottish Parliament
Edinburgh
EH99 1SP

foi.officer@parliament.scot

23 October 2023

Dear Requester,

REQUEST FOR INFORMATION: 2023-693143

We acknowledge your request for the following information:

In 2020 the Justice sub-committee on policing published this [report](#) on facial recognition technology in policing. This included a number of actions for the committee about Glasgow City Council's proposed use of 'Suspect Search' software into its CCTV systems.

- The sub-committee was tasked with writing to the UK Information Commissioner to request an update on its consideration about Suspect Search technology*
- The sub-committee was asked to write to Glasgow City Council to ask for an update on its plans.*

Please can you provide all of the relevant correspondence which came from these actions.

Your request was received on 9 October 2023 and has been handled in accordance with the Freedom of Information (Scotland) Act 2002 (FOI(S)A).

The Scottish Parliament's Justice Sub-Committee on Policing's [report](#) on *Facial recognition: how policing in Scotland makes use of this technology* from session 5 stated that:

“The software has not yet been introduced, as the UK Information Commissioner's Office is currently considering the data protection impact assessment. The Sub-Committee is to write to the ICO to request an update on its consideration, and to Glasgow City Council to request further details of its plans”.

The letter you requested from the Sub-Committee to Glasgow City Council, of 18 February 2020, can be accessed here:

https://archive2021.parliament.scot/S5_JusticeSubCommitteeOnPolicing/Inquiries/20200218JFtoGCC.pdf

Similarly, the response you requested from Glasgow City Council of 12 March 2020, can be accessed here:

https://archive2021.parliament.scot/S5_JusticeSubCommitteeOnPolicing/Inquiries/20200312GCCtoJohn_Finnie_Facial_Recognition_Inquiry.pdf

It indicates that:

“GCC is currently finalising the Data Protection Impact Assessment (DPIA) before assessing whether we need to share this with the Information Commissioner’s Office (ICO)”.

Please note that we do not hold a copy of any letter to the UK Information Commissioner’s Office. Were any letter sent, it has not been published. It has also not been retained as we had no business reason to keep this correspondence at the end of session 5.

It may be helpful to you if we point out that in its report, the Sub-Committee also made the following recommendation (paragraph 289):

“The Sub-Committee asks the Scottish Police Authority to review Police Scotland’s plans to access and use Glasgow City Council’s Suspect Search technology. This should include consideration of whether all the necessary impact assessments have been undertaken and safeguards met”.

In its [response](#) to the Sub-Committee’s report, the Scottish Police Authority indicated that:

“The Suspect Search Facility is still undergoing development by Glasgow City Council and is not available to Police Scotland. Our understanding is that the technology **does not** use facial recognition; rather it scans existing CCTV images to track potential persons of interest on the basis of height, colour of clothing etc. It is a standalone system which does not communicate with any Police Scotland or other external databases. Once the system is developed, if Police Scotland plan to access and use the system, then SPA scrutiny will include all necessary impact assessments and safeguards”.

In its [response](#) to the Sub-Committee’s report, Police Scotland indicated that:

“**Paragraph 289:** I can reassure the Sub-Committee that Police Scotland will not use this technology without all the necessary impact assessments having been undertaken and safeguards met. Indeed,

without pre-empting the decision of the Information Commissioner, I think this work presents a further opportunity for an Ethics Panel to consider this specific development”.

In line with the technical requirements of FOI(S)A, we have attached a notice advising that we do not hold a copy of a letter to the UK Information Commissioner in the scope of the request.

In keeping with our FOI procedures, this information may also be posted on the Parliament's disclosure log (usually within 24 hours). For further details on the Parliament's Disclosure Log and the information released under FOI, visit: [FOI Request Disclosure Log | Scottish Parliament Website](#)

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We would welcome feedback or comment on how we handled your request. Please feel free to contact the Head of Information Governance at foi.officer@parliament.scot

Please find below Annex A, which explains how we handle FOI requests and reviews.

We are currently working remotely and so would ask you to contact us by email at foi.officer@parliament.scot

Yours sincerely,

Linda Forrest
Information Compliance Officer

REQUESTS MADE UNDER THE FREEDOM OF INFORMATION (SCOTLAND) ACT 2002

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[Privacy notice: Information rights: Freedom of Information request handling | Scottish Parliament Website](#)

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<https://www.parliament.scot/contact-us>

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If you are dissatisfied with the way in which we have dealt with your request for information, you can ask us to review our decision and actions. You must do this in writing (or other permanent form) within 40 working days of the date of this letter, stating the reasons for your dissatisfaction, and we will respond within 20 working days of receipt. A request for a review should be made to the Head of Information Governance:

Post: Head of Information Governance
The Scottish Parliament
Edinburgh
EH99 1SP
Telephone: 0131 348 5281

We welcome calls using the Text Relay service or in British Sign Language through [contactSCOTLAND-BSL](#).

E-mail: foi.officer@parliament.scot

Application to the Scottish Information Commissioner

If, on the outcome of any review, you are still dissatisfied, or if we are unable to resolve any other complaint, then you can contact the Scottish Information Commissioner:

Post: The Office of the Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
Fife
KY16 9DS

Email: enquiries@itspublicknowledge.info

Telephone: 01334 464610

Website: www.itspublicknowledge.info

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Feedback or comment

We would welcome feedback or comment on how we handled your request. Please contact the Head of Information Governance.

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[Privacy notice: Information rights: Freedom of Information request handling | Scottish Parliament Website](#)

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If you are dissatisfied with the way in which we dealt with your enquiry, then you may wish to raise the matter with Public Information and Resources.

How to contact us

Post: The Scottish Parliament
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Telephone: 0131 348 5000
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0131 348 5395 (Gàidhlig)

We also welcome calls using the Text Relay service or in British Sign Language through [contactSCOTLAND-BSL](#).

E-mail: info@parliament.scot