



SCOTTISH POLICE
AUTHORITY
ÙGH DARRAS POILIS NA H-ALBA

2 Clyde Gateway
French Street
Glasgow
G40 4EH

LETTER SENT BY EMAIL ONLY

3 September 2025

FOI Ref 2025/26-059

Request

Your request for information dated 13 August 2025 is copied below.

Thank you for your response to FOI request 2025/26-045 dated 7 August 2025. I appreciate the provision of public minutes, registers of interest, and recruitment documentation.

To support the integrity of this public-interest inquiry, I respectfully seek further clarification on the following:

1. Oversight of Enforcement Infrastructure

- Does SPA maintain any internal governance documents, memoranda of understanding, or operational protocols relating to Police Scotland's use of biometric systems, surveillance technologies, or enforcement platforms?
- Are any internal reviews, risk assessments, or ethical evaluations conducted prior to approving or funding such systems?

2. Private Session Transparency and Redaction Protocols

- While private session minutes are withheld under Section 12, has SPA considered publishing redacted summaries or decision logs to support public transparency?
- Is there a formal redaction protocol or review process that could be applied to narrow the scope of disclosure?

3. Jurisdictional Authority and Corporate Identity

- Does SPA hold a Legal Entity Identifier (LEI), D-U-N-S® number, or equivalent commercial registration?
- Under what legal framework does SPA operate—statutory corporation, executive agency, or incorporated governance body?
- Are individuals engaging with SPA or subject to its oversight presumed to be interacting with a public authority or a corporate governance entity?

On 18 August 2025 we requested clarification to assist in narrowing the scope of your request.

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Your response received on 18 August is copied below.

Thank you for your response regarding my FOISA request. I'm happy to provide clarification to assist your business areas in progressing the request.

To confirm:

1. The phrase "Does SPA maintain..." is a request for recorded information. I am seeking copies of any governance documents, memoranda of understanding, or operational protocols held by SPA relating to Police Scotland's use of biometric systems, surveillance technologies, or enforcement platforms.
2. The technologies of particular interest include:
 - Live facial recognition (LFR)
 - Body worn video (BWV)
 - Remotely Piloted Aircraft Systems (RPAS/drones)
 - Mobile biometric devices or platforms used for identity verification
3. By "enforcement platforms," I refer to digital or technical systems used to support operational policing, including:
 - Surveillance and biometric identification systems
 - Predictive policing tools
 - Data analytics platforms used for enforcement decision-making
 - Any integrated systems used to coordinate or deploy enforcement resources
4. Please consider the timeframe for this request to be from 1 January 2023 to the present.

Regarding the second part of the request, I am seeking any internal reviews, risk assessments, or ethical evaluations conducted prior to SPA approving or funding the systems listed above. This includes:

- Ethical impact assessments
- Human rights or privacy impact reviews
- Risk registers or internal briefing notes

Response

The Scottish Police Authority has considered your request under the Freedom of Information (Scotland) Act (FOISA).

In response to part one of your request, headed oversight of enforcement infrastructure. Information on oversight of technologies over the period 1 January 2023 to current is held. Clarification was requested in an effort to reduce the information in scope to a specific type of technology within a

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specific timeframe. Clarification did not narrow the scope, nor reduce the volume of information held. Therefore, we are unable to provide this information as it would prove too costly within the context of the fee regulations.¹

To explain, an initial review of information relating to just two types of technologies that would be considered in scope of your request returned a minimum of 16 documents. Collectively this information consists of over 2000 pages, and as an example, one governance document alone consists of 154 pages. This document will have information throughout that is commercially sensitive, which if disclosed would likely prejudice substantially the commercial interests of an organisation or the Authority, and therefore is considered exempt under FOISA. Therefore, this would require individual review by the relevant Head of Service as well as, in some cases, the Authority's Head of Legal to identify information to be redacted. The Authority has assessed that the £600 cost limit within the Act equates to 40 hours of work, and we estimate that it would exceed these thresholds to process your request.

The Authority recognises that technology in policing is a matter of public interest. Therefore, to assist, a list of publicly available resources is provided. This demonstrates the broad landscape your request covers and may assist you in narrowing any future request to specific aspects of a specific technology. For example, information held in relation to how long Body Worn Video data is retained for, or the operational protocol for Body Worn Video, or the Equality Human Rights Impact Assessment for Live Facial Recognition.

Body Worn Video

- [Public Briefing on Body Worn Video](#)
- Police Scotland's dedicated web page for [Body Worn Video](#)
- [Police Scotland's Body Worn Video Standard Operating Procedure](#) (operational protocol). This includes key information on when to record, what to record, the use of pre-recording, the use of the cameras in various settings, retention and sharing of recordings etc.
- [Police Scotland's EqHRIA summary results](#) for the introduction of Body Worn Video.

Live Facial Recognition

- [Discussion Paper on the Potential Adoption of Live Facial Recognition by Police Scotland - Summary](#)
- [Live Facial Recognition Report - 10 June 2025](#)
- [Live Facial Recognition - 10 December 2024](#)

¹ This represents a refusal notice in terms of Section 12 of the Freedom of Information (Scotland) Act 2002 – Excessive Cost of Compliance.

Drones (Remotely Piloted Aircraft Systems)

- [Public briefing on Police Scotland's use of Remotely Piloted Aircraft Systems \(Drones\) - September 2024](#)
- [Air Support Strategic Plan - 11 June 2024](#)
- [RPAS Update - 15 June 2023](#)
- [Drones Downlink System & Service Update - 17 March 2022](#)
- [Air Support Unit RPAS Code of Practice](#)
- Police Scotland's dedicated webpage for [Air Support Unit and Drones](#)

Biometric Identification

- The [Forensic Information Databases Service \(FINDS\)](#) - the FINDS Unit in the Home Office manages national biometric databases on behalf of policing. This includes information on the National DNA Database, National Fingerprint Database and National Footwear Database.
- [Memorandum of Understanding for the Provision of Forensic Services in Scotland](#), see sections 3.4, 6.2, pages 37, 39 and 40.
- Police Scotland's dedicated web page for [Biometrics](#)

In response to part two of your request headed Private Session Transparency and Redaction Protocols. The Authority publishes the minute of private sessions of its [Complaints and Conduct Committee on the Authority's website](#). Private minutes are considered and approved at the next scheduled meeting of the committee. For example, the minutes of Complaints and Conduct Committee meetings held on 24 November 2024 and 19 December 2024 were published, considered and approved at a meeting of the committee held on 24 February 2025 ([see items 2.2 and 2.3 here](#)).

All other committees of the Authority summarise their considerations in both public and private session in a Committee Chair's Report which is presented to the preceding full Authority meeting. [Committee Chair's reports are generally published at Item 4 on Authority meeting agendas](#). For example, the most recent [Committee Chair reports were reported to the full Authority on 21 August 2025](#) (item 4).

The Authority does not have a formal redaction or review process.²

² This represents a notice in terms of Section 17 of the Freedom of Information (Scotland) Act 2002 - Information not held.

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In response to part three of your request headed Jurisdictional Authority and Corporate Identity. The Authority does not hold information.³

The Scottish Police Authority is not registered as a corporation or company. The Authority was established by statute as a "body corporate" through the [The Police and Fire Reform \(Scotland\) Act 2012](#). The [Scottish Government's guide to public bodies](#) sets out the public bodies landscape in Scotland, see section 12-13 for information related to the Authority.

Right to Review

If you are dissatisfied with the outcome of your request you can ask for a review within 40 working days. You must specify the reason for your dissatisfaction and submit your request by email to foi@spa.police.uk or by letter to Scottish Police Authority, 1 Pacific Quay, Glasgow, G51 1DZ.

If you remain dissatisfied after review, you can appeal to the Scottish Information Commissioner within six months. You can apply [online](#), by email to enquiries@foi.scot or by letter to Scottish Information Commissioner, Kinburn Castle, Doubledykes Road, St Andrews, Fife, KY16 9DS.

Should you wish to appeal against the Commissioner's decision, you can appeal to the Court of Session, only if you think the law has not been applied correctly.

This response will be posted to our [Disclosure Log](#) after seven days.

Yours faithfully

Scottish Police Authority

³ This represents a notice in terms of Section 17 of the Freedom of Information (Scotland) Act 2002 - Information not held.