

Chief Constable
Chief Constable Robert Carden
Police Headquarters
Carleton Hall Penrith,
Cumbria
CA10 2AU



18th February 2025

Dear

FREEDOM OF INFORMATION REQUEST – FOI 92/25 Facial Recognition

I refer to your request for information received by Cumbria Constabulary on the 21st of January 2025. I note you seek access to the following information:

- 1. The processes (if any) undertaken by your force when using the Police National Database's face search capability to identify children (minors under the age of 18).*
- 2. If there is a Child Rights Impact Assessment for the use of:*
 - a. The Police National Database (PND)*
 - b. Facial Recognition Technology*
 - c. Retrospective Facial Recognition Technology*
- 3. The number of times Facial Recognition Technology, Retrospective Facial Recognition Technology and/or the Police National Database were used to identify children (minors under the age of 18).*
- 4. The following information about each search:*
 - date*
 - reason for search*
 - officer defined ethnicity*
 - self-defined ethnicity*
 - gender of the person searched*
 - age of person searched*
 - response (i.e., whether the search returned a record and led to an arrest)*
- 5. Are CCTV images used during facial recognition checks which utilise the PND? If so, please share the number of times CCTV images were used for facial recognition checks*
- 6. Are CCTV images and footage retained on the Force Video management system, including those which depict children under the age of 16 and under the age of 18?*
- 7. Are images or data from facial recognition searches (in particular of minors under the age of 18) shared with other agencies or private organizations? If so, under what conditions?*
- 8. If your force does not currently use Facial Recognition Technology, retrospective Facial Recognition and/or the Police National Database (PND) please state if there are plans to.*



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Your request for information has now been considered and I can confirm that Cumbria Constabulary does not hold the information you have requested in an easily retrievable format. To locate and retrieve all the information you seek in questions 3, 4 and 5 it would be necessary to contact each individual who has made an overt retrospective facial recognition search on the Police National Database and a manual review of each search would be required.

I have estimated that the time required to complete a manual review to locate and extract all information relevant to your request would significantly exceed the "appropriate limit", as stated in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. The current limit for police forces is set at £450, which equates to 18 hours of work.

Section 12(1) of the Freedom of Information Act does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit. In view of this, and in accordance with Section 17(5) of the Act, this letter serves as a Refusal Notice for your request, by virtue of Section 12(1).

In accordance with the duty under Section 16 of the Act (duty to provide advice and assistance), I regret to say that on this occasion I am unable to offer you any advice or assistance to help you to refine your request so that the time required would be within the "appropriate limit".

Complaint Rights

If you believe your request has not been properly handled, or you are otherwise dissatisfied with the outcome of your request, you have the right to request an internal review.

In the first instance, please email freedomofinformation@cumbria.police.uk quoting the FOI reference number and explain why you are dissatisfied. Your complaint will be considered and a response will be provided to you after your complaint has been investigated.

If you remain dissatisfied following conclusion of the internal review, you have the right, under section 50 of the Freedom of Information Act, to complain directly to the Information Commissioner.

The address for the Information Commissioner can be found below:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Complaints to the Information Commissioner can also be made online:

[Make a complaint | ICO](#)

I would like to take this opportunity to thank you for your interest in Cumbria Constabulary.



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