



OFFICIAL SENSITIVE WHEN  
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## Cumbria Constabulary

# Authorisation for the Deployment of Live Facial Recognition

Please refer to the LFR Policy, Procedures, Equality Impact Assessment and overarching LFR Data Protection Impact Assessment

**ONCE APPROVED AND COMPLETED, PLEASE EMAIL THIS FORM TO: Authorising Officer (Det Supt Intel)**

For help completing this form, please see Guidance Notes. All boxes must be filled in.

LFR Deployment ref:		(LFR Use Only)
Operation Name		
Operational Order attached		
Force Intel Ref		
Force Log No.		

Dates of Deployment		Date and time request to be completed on or by if applicable.
Times of Deployment		Deployments may not endue beyond a 7-day period
Location (address)		
Postcode or OS Grid Ref		

### REQUESTING OFFICER (Gold Commander for the Operation)

Name		Rank & Collar No.	
Station Address			
Postcode			
Contact No.		Email	



### DETAILS OF DEPLOYMENT

Specify exact nature of deployment? Location date, time and duration

### DETAILS OF WATCHLIST CRITERIA

Specify the watchlist criteria in detail. What is the source of the data, what is the dataset, how many records are within the dataset, what is the watchlist rationale? If the location raises higher expectations of privacy this is to be explained, and any additional safeguard/mitigations outlined

Please confirm if the watchlist will include images of persons:

**Between 10 and 18 years  
(must be provided with clear information and support so they can understand their rights ensuring they are not unfairly targeted or overlooked)**

**Y/N  
(if yes, please provide rationale and justification)**

**Under 10 years.  
(must be provided with clear information and support so they can understand their rights ensuring they are not unfairly targeted or overlooked)**

**Y/N  
(if yes, inclusion will need to be rationalised in the justification)**

**Disabled and other vulnerable people who may be disproportionately affected by facial recognition surveillance. Disabled individuals and vulnerable communities must be provided with clear information and support so they can understand their rights ensuring they are not unfairly targeted or overlooked**

**Y/N  
(if yes, inclusion will need to be rationalised in the justification)**

**Person who has undertaken gender reassignment and it is believed or suspected to be that the watchlist would be using an image of that person prior to their reassignment**

**Y/N  
(if yes, inclusion will need to be rationalised in the justification)**

### WATCHLIST RATIONALE

Specify the rationale for the watchlist criteria. If the location raises higher expectations of privacy this is to be explained, and any additional safeguard/mitigations outlined



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**WHAT MEASURES HAVE BEEN TAKEN TO ENSURE THE ACCUACY OF THE WATCHLIST DATA**

Specify the watchlist criteria in detail. What is the source of the data, what is the dataset, how many records are within the dataset, what is the watchlist rationale? If the location raises higher expectations of privacy this is to be explained, and any additional safeguard/mitigations outlined

**DETAILS OF LEGAL BASIS**

Specify exact nature of your legal basis and legitimate aim to be defined. Applicant to explain how the deployment will achieve the legitimate aims informed by the intelligence case.

The underlying power(i) Common Law Policing Purposes which may be summarised as: protecting life and property, preserving order, preventing the commission of offences, and bringing offenders to justice and/or (ii) any duty or responsibility arising from statute or other rule of law including court order and royal prerogative.

<p><b>Lawful basis</b></p> <p>To process personal data you must have a lawful basis. Please select a lawful basis from the drop down lists (where appropriate). Guidance on lawful processing can be located on the <a href="#">ICO website</a>.</p>	
Basis for Law Enforcement Data <sup>s</sup> -(If applicable):	Choose an item.
Basis for General/Administrative Data <sup>s</sup> (If applicable):	Choose an item. <sup>s</sup>
<p><b>Lawful basis for 'special category' data<sup>s</sup>—————(Only complete if relevant)</b></p> <p>If using special category data, you need to specify an additional lawful basis from the list below.</p>	
<p><b>Law Enforcement Data<sup>s</sup> (If applicable):</b></p> <ul style="list-style-type: none"> <li>• Is it based on law? (please tick to confirm)</li> </ul> <p><b>And</b></p> <ul style="list-style-type: none"> <li>• Is it necessary for one of the following conditions? (select from the list):</li> </ul>	<p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (if no, add as <a href="#">risk</a>)</p> <p>Outline statute/common law power</p> <p>Choose an item.</p>
<p><b>General Data<sup>s</sup>-(If applicable):</b></p> <ul style="list-style-type: none"> <li>• Is it necessary for one of the following conditions? (select from the list):</li> </ul>	<p><input type="checkbox"/> N/A</p> <p>Choose an item.</p>

**DETAILS OF NECESSITY**

Specify necessity. Why is necessary to achieve the legitimate aim in a democratic society and why is the processing of data is strictly necessary? Pressing social need to be identified



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**DETAILS OF PROPORTIONALITY**

Specify proportionality to include the importance of the objective, alternatives, public awareness steps

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**DETAILS OF SAFEGUARDS**

Specify exact nature of safeguards

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**Risks and Mitigation**

Refer to the overarching DPIA Stage 2 for guidance. Consider privacy risks, data accuracy, data management and security, public engagement and publication of deployment, safe zones. Contact DP@cumbria.police.uk

LIKELIHOOD OF HARM	IMPACT / SEVERITY OF HARM				Impact Description:
	Low 1	Medium 2	High 3	Extreme 4	
Almost Certain 4	MEDIUM 4	HIGH 8	HIGH 12	HIGH 16	Extreme Total service disruption / very significant financial impact / Government intervention / sustained adverse national media coverage / multiple fatalities.
Likely 3	LOW 3	MEDIUM 6	HIGH 9	HIGH 12	High Significant service disruption / significant financial impact/ significant adverse Government, Audit Commission etc report / adverse national media coverage / fatalities or serious disabling injuries.
Possible 2	LOW 2	MEDIUM 4	MEDIUM 6	HIGH 8	Medium Service disruption / noticeable financial impact / service user complaints or adverse local media coverage / major injuries
Unlikely 1	LOW 1	LOW 2	LOW 3	MEDIUM 4	Low Minor service disruption / low level financial loss / isolated complaints, minor injuries

**Risk Register**

Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm 1 / 2 / 3 / 4	Severity of harm 1 / 2 / 3 / 4	Initial Risk L / M / H	Mitigation / Solution Describe the mitigation and whether it will be implemented	Result <i>Is the risk:</i> - Eliminated - Reduced - Accepted	Residual Risk L / M / H

**Data Protection Officer Comments (refer to Data Protection prior to submitting this form to the Authorising Officer)**

Name				Role	
Contact No.		Email			
Date					



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Comments	
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**AUTHORISING OFFICER \***

Name		Rank	
Contact No.		Email	
Date			

**GUIDANCE NOTES**

- For regional LFR van deployment the request will require review by GMP (lead force). In these circumstances the GMP LFR Unit will attempt to meet this request for pre-planned support (mutual aid), occasionally it may be necessary to prioritise requests. In such cases, each request will be considered based on the greatest threat, harm and risk. The decision will be made by the GMP Chief Superintendent of Operations Command where their decision will be in writing detailing their rationale.
- Please complete the form in as much detail as you can to avoid unnecessary delays.
- Specify exact nature of watchlist rationale. If the location raises higher expectations of privacy this is to be explained, and any additional safeguard/mitigations outlined.
- Specify exact nature of your legal basis and legitimate aim to be defined. Applicant to explain how the deployment will achieve the legitimate aims informed by the intelligence case.
- Specify necessity. Why is necessary to achieve the legitimate aim in a democratic society and why is the processing of data is strictly necessary? Pressing social need to be identified.
- Specify proportionality to include the importance of the objective, alternatives, public awareness steps
- For specific events you must specify time/date/location.
- For multiple locations on the same intelligence / operation / investigation or task, please include details of all locations.
- Please include any additional mapping / plans as an attachment.
- Record specific risks to the deployment and document the mitigating actions that you will be taking to reduce the likelihood and/or impact.
- Consult with the Data Protection team in Information Management prior to submission to the Authorising Officer
- Authorising officer **MUST** be of at least the rank of Superintendent.
- The Covert Authority Bureau will Q & A this submission to ensure that the legality, proportionality and intrusion meets the standard require for an LFR deployment, if the submission does not meet the standard, it will be returned to the AO for further amendments.
- ONCE APPROVED BY THE CAB, PLEASE EMAIL THIS FORM TO: Authorising Officer (Det Supt Intelligence)



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