Live facial recognition by the Metropolitan Police and South Wales Police

IMPLEMENTED 2017–2026 · GOVERNMENT AND PUBLIC SERVICES · UK · BAND C · PARTLY PROVED
VERSION 1.0 · PUBLISHED 15 NOVEMBER 2026 · UPDATED 15 NOVEMBER 2026 · FACTS CHECKED 15 NOVEMBER 2026

Two police forces scan faces in public against watchlists of wanted people. The Court of Appeal found South Wales Police's early use unlawful in 2020. National Physical Laboratory testing in 2023 found no statistically significant demographic difference at certain settings, which an academic disputes. In 2026 the High Court found the Metropolitan Police's current policy lawful.

ABOUT THIS SYNOPSIS

This is MarLuc's summary and grading of publicly available sources, for information only. It is not investment, legal, financial or professional advice, and should not be relied on for any decision. Readers must validate it against the original sources and, where appropriate, challenge its conclusions.

Facts and figures are as reported by the sources listed below, which may be incomplete, self-reported or out of date. Check the original source before relying on any figure.

The impact band, proof marker and SEAM view are MarLuc's opinion. The organisation is not a MarLuc client and has not reviewed or endorsed this synopsis. Names and trademarks belong to their owners.

NOTICE WORDING LAST UPDATED 16 NOVEMBER 2026

AT A GLANCE

AI used: Live facial recognition: cameras capture faces in public, software compares them with a watchlist of wanted persons, and an operator reviews each alert. South Wales Police licensed NEC NeoFace Watch; reporting on the NPL test says the Met uses an NEC system..

Implemented: 2017–2026. Grade: band C, Process change, Partly proved.

Headline result, as reported: Court of Appeal found South Wales Police's live facial recognition unlawful (2020); the Met reports 962 arrests from 203 deployments in a year (2024-25); the High Court upheld the Met's policy (April 2026)

1 · The case

The facts, as reported by the 5 sources listed at the end. Where a source is silent, the field says "Not reported".

Organisation

Metropolitan Police Service and South Wales Police. Two UK police forces. South Wales Police ran the AFR Locate trial from 2017; the Metropolitan Police Service runs live facial recognition in London under a policy adopted on 11 September 2024. Canvas block: 4. Operations and process. Also 8. Governance and risk.

Business challenge

The challenge. Per the Court of Appeal, South Wales Police used live facial recognition to compare faces captured in public with a watchlist compiled for each deployment. The forces' stated aim in the NPL testing was to understand how the algorithm performs in operational use, with the test plan designed to identify any impact on race, age and sex.

How it was addressed. South Wales Police deployed AFR Locate about 50 times between May 2017 and April 2019 using NEC's NeoFace Watch. The Court of Appeal found in August 2020 that the legal framework left two areas of discretion too wide (who goes on a watchlist and where the system is deployed), that the data protection impact assessment was deficient and that the force had not met the Public Sector Equality Duty. The Met and South Wales Police then had the algorithm tested by the National Physical Laboratory (published April 2023). The Met adopted a revised policy in September 2024 with three defined use cases, and reports 962 arrests from 203 deployments in the year to September 2025. [1] [2] [3] [4] [5]

Who implemented it

In-house (In-house): Runs live facial recognition deployments in London under its own policy..
In-house (In-house): Ran the AFR Locate trial from 2017 and is the national lead on testing, per the Court of Appeal..
NEC (Software vendor): Supplied NeoFace Watch to South Wales Police; the Met system is reported as NEC's..
National Physical Laboratory (University or research lab): Ran the independent equitability test commissioned by the two forces..
The NPL report was supported by Ingenium Biometrics and the University of Kent, per Biometric Update (April 2023), which this synopsis did not cite.

Technology (SEAM pillar E)

SEAM types: T8 Predictive / ML models. Deployment: Not reported. Vendors and products: NEC, NeoFace Watch.

Where it was built in: Cameras on vehicles, poles or posts capture faces in real time; software extracts biometric data and compares it with a watchlist prepared for each deployment; unmatched data is deleted and a trained operator monitors the live feed (per the Court of Appeal and the High Court summary).

What changed

Before: deployments rested on police documents that the Court of Appeal found left too much to individual officers. After: the Met's September 2024 policy limits use to three defined use cases with watchlist criteria and a proportionality assessment for every deployment, and the High Court in April 2026 held it lawful. Whether live facial recognition has changed policing outcomes is the Met's account, not an independent finding. [1] [2] [3] [4] [5]

What it cost

Not reported. The Court of Appeal granted declarations only; the parties agreed the only remedy needed was a declaration.

What it saved

Not reported as a cost or time saving. Outputs reported by the Met, relayed by The Register: 962 arrests from 203 deployments between September 2024 and September 2025, of which 549 were people wanted by the courts, 347 were arrests on reasonable grounds and 85 related to people managed by multiple agencies. The Met says none was deemed unnecessary. These are the Met's own figures. [1] [2] [3] [4] [5]

Governance and control

Courts have reviewed both forces' arrangements. In 2020 the Court of Appeal found South Wales Police had "never sought to satisfy themselves, either directly or by way of independent verification" that the software was free of unacceptable bias on grounds of race or sex. In 2026 the High Court held the Met's revised policy lawful, noting a clear chain of command and mandatory proportionality assessment. The NPL test was commissioned by the forces; an academic disputes how far it supports the Met's public claims.

S2 · Accountable owner · Outside scrutiny (a regulator, court, auditor or similar body acted)
The High Court summary records a clear chain of command and oversight in the Met's policy, quoting "a far cry from the 'hunch' or 'professional intuition' of an individual officer"; the Commissioner defended the claim. [5]

A1 · Safe use · Outside scrutiny (a regulator, court, auditor or similar body acted)
The Court of Appeal found South Wales Police's framework unlawful in 2020; the High Court in 2026 held the Met's revised policy lawful, with three use cases and a mandatory proportionality assessment. [1] [5]

A2 · Human in the loop · Outside scrutiny (a regulator, court, auditor or similar body acted)
The High Court summary records that unmatched biometric data is deleted and the live feed is monitored by a trained operator; the Met says each false alert is reviewed (as relayed by The Register). [4] [5]

A3 · Monitoring and assurance · Outside scrutiny (a regulator, court, auditor or similar body acted)
The forces commissioned NPL testing (published April 2023); an academic disputes its sample; the Met publishes annual deployment figures. [2] [3] [4]

A4 · Vendor AI · Outside scrutiny (a regulator, court, auditor or similar body acted)
In 2020 the Court of Appeal found the manufacturer would not disclose details for commercial confidentiality and South Wales Police had not independently verified bias; NPL testing of the algorithm followed. [1] [2]

A5 · Agent controls · Not reported
No agents described.

A6 · Standards and regulation · Outside scrutiny (a regulator, court, auditor or similar body acted)
Court of Appeal declarations in 2020 (Article 8, DPIA, Public Sector Equality Duty) and a High Court dismissal of the challenge to the Met's policy in 2026. [1] [5]

What worked, what did not, what is unproven

WORKED

– The NPL study, per the police science office, found settings at which there is no statistical significance between demographic performance in live facial recognition.

– The High Court held that the Met's September 2024 policy meets the quality of law test under Articles 8, 10 and 11 of the European Convention on Human Rights and does not give unfettered discretion to individual officers.

– The Met reports 10 false alerts in 2,077 alerts over 203 deployments, with six leading to engagements of no more than five minutes and none to arrest (the Met's account, per The Register).

– The Court of Appeal found South Wales Police's use on 21 December 2017, 27 March 2018 and on an ongoing basis was not in accordance with the law, that its data protection impact assessment did not comply with section 64 of the Data Protection Act 2018 and that it had not complied with the Public Sector Equality Duty.

– The NPL testing showed false positives rising at lower thresholds (0.58 and 0.56), with a statistically significant imbalance in which more Black subjects had a false positive than Asian or White subjects, per Biometric Update.

– Of the Met's 10 false alerts in 2024-25, seven involved Black males and one a Black female; the Met says the differences are not statistically significant, per The Register.

– Pete Fussey, University of Essex, says the Met's public claim of no bias rests on "just seven false matches" and is a weak statistical basis.

UNPROVEN

– Whether the NPL results hold for every operational setting and deployment location; the Met and the critic disagree on the sample.

– Whether live facial recognition reduces crime. The sources opened give arrest counts only, from the Met.

– Whether any appeal follows the High Court judgment: not reported in the sources opened.

– Results for other forces, other algorithms or later versions of the system: not examined in the sources opened.

Timeline

May 2017 South Wales Police begins deployments of AFR Locate (about 50 between May 2017 and April 2019) [1]

Sept 2019 Divisional Court dismisses Edward Bridges' judicial review [1]

Aug 2020 Court of Appeal allows the appeal on three of five grounds and grants declarations [1]

Apr 2023 Police science office publishes the NPL equitability study of the forces' algorithm (5 April 2023) [2]

Feb 2024 Shaun Thompson is matched to an image of his brother near London Bridge and stopped by police [5]

Sept 2024 Met adopts its revised live facial recognition policy (11 September 2024) [5]

Nov 2025 Met reports 962 arrests from 203 deployments in the year to September 2025 [4]

Apr 2026 High Court dismisses the challenge to the Met's policy (21 April 2026) [5]

2 · Grade and SEAM assessment

MarLuc's opinion, made on the evidence above. How cases are graded: marluc.co.uk/case-studies/how-we-rate

Level of change and impact

Claimed: A. Grade: C, Process change. Proof: Partly proved. Level of change: Process change.

Process change (Level 2, band C). Deployments follow a written policy with defined use cases, watchlist criteria, authorisation and operator review. Whether it has transformed policing is a

The SEAM view and lessons learnt

The Court of Appeal decided a legal framework question first: what discretion officers had over who is on a watchlist and where cameras go. It then asked a data question: whether anyone had checked the software for bias. The forces answered the second with independent NPL testing and the first with a written policy that a court has since accepted. For any organisation using identification technology, the same two layers apply: written limits on use, and independent measurement of error rates across groups. The critic's point shows that how a test is sampled, and which settings it covers, shapes what can be claimed from it.

1. Write the limits on who is watched and where before deploying, and get them tested by a court or regulator.
2. Commission independent accuracy testing across demographic groups and publish the settings used.
3. Report false alerts as a rate of both faces scanned and alerts raised, with the demographic split.

Evidence

Score 3 of 4. Independent in part: two court decisions and an NPL test commissioned by the forces; arrest figures are the Met's own, and the NPL conclusions are disputed by an academic.

Evaluation method. Court findings (Bridges 2020; Thompson and Carlo 2026), a commissioned independent test (NPL 2023) as reported by the police science office and the press, and the Met's own annual figures as relayed by The Register. No randomised or controlled evaluation of outcomes.

Sources disagree. The Met says the NPL study found no statistically significant bias at thresholds of 0.6 or higher. Pete Fussey says that conclusion rests on seven false matches and a small sample. The NPL report itself, per Biometric Update, notes no false positives at 0.64 or higher and a significant imbalance at 0.58 and 0.56.

Status. Ongoing: live facial recognition continues in London; the High Court judgment is dated 21 April 2026.

3 · Original sources

Read these in full. To challenge a fact or a grade, use the contact form at marluc.co.uk or the link on https://marluc.co.uk/case-studies/police-live-facial-recognition-uk

[1] Court of Appeal: R (Bridges) v Chief Constable of South Wales Police [2020] EWCA Civ 1058
https://www.judiciary.uk/wp-content/uploads/2020/08/R-Bridges-v-CC-South-Wales-ors-Judgment.pdf

[2] Office of the Police Chief Scientific Adviser: Operational Testing of Facial Recognition Technology
https://science.police.uk/research/resources/operational-testing-of-facial-recognition-technology/

[3] Biometric Update: Police claims on live facial recognition bias not supported by facts, UK professor
https://www.biometricupdate.com/202508/police-claims-on-live-facial-recognition-bias-not-supported-by-facts-uk-professor

[4] The Register: Metropolitan Police hails facial recognition tech after record year for arrests
https://www.theregister.com/2025/11/03/metropolitan_police_hails_facial_recognition/

[5] High Court: Press summary, R (Thompson and Carlo) v Commissioner of Police of the Metropolis [2026] EWHC 915 (Admin)
https://www.judiciary.uk/wp-content/uploads/2026/04/Summary-of-judgment-Thomson-and-Carlo-v-Metropolitan-Police-Commmissioner-AC-2024-LON-001764-21-04-2026.pdf

Version 1.0 · Published 15 November 2026 · Updated 15 November 2026 · Facts checked against sources 15 November 2026 · Downloaded 26 November 2026. This PDF may be out of date: the latest version, and a way to report an error or a better source, is at https://marluc.co.uk/case-studies/police-live-facial-recognition-uk

VERSION HISTORY

v1.0 15 November 2026 First published