



Serving our communities to
make them safer and stronger

HUMBERSIDE POLICE

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FAO All Chief Constables

8 February 2022

Dear Colleagues

I am writing to you as the NPCC lead for Records Management (RMCG) to provide an update in relation to the review of custody image management.

To ensure public awareness and confidence on how forces retain and dispose of custody images, members of a joint custody images subgroup comprising of both policing and Home Office colleagues are meeting monthly to focus on this matter and have helpfully created the attached guidance document for all forces.

As the emergence and use of technologies such as facial recognition are adopted more widely across law enforcement, the need to ensure that all images used for these purposes are lawfully retained increases. It is estimated that UK policing currently holds 19 million images on PND that may not have been through a process of review to decide if they can be retained or should be disposed.

This position poses a significant risk in terms of potential litigation, police legitimacy and wider support and challenge in our use of these images for technologies such as facial recognition.

Therefore, the guidance has been designed in order to assist colleagues in ensuring that forces can enhance how they are able to proactively provide members of the public their rights in relation to the review and disposal of custody images.

The guidance has been specifically designed as an online resource and I ask that consideration is given to publishing it on your external force website as well as proactively providing the details to all detainees leaving your custody suites.

One final request is for the guidance to be shared with all Force Records Managers, Corporate Communication and Custody leads, in order that the information is available to the public as broadly as possible. This will help us to demonstrate that we are raising awareness of the right to request deletion, should future challenges emerge in relation to whether the use of images for other purposes is lawful.

In relation to the potential significant backlog of images being held in your force, you may wish to be sighted on the current processes in place to manage the review and removal of custody images in your organisation.

The College of Policing APP on the Management of Police Information is in place to assist and advise forces on this process.

Please see the following links for further information: -

<https://www.app.college.police.uk/app-content/information-management/management-of-police-information/retention-review-and-disposal-of-police-information/#custody-images>

Members of the Records Management portfolio team are available to assist in any way they can and can be contacted via the details below: -

Mark Williams
Carol Duff

****S31 Law Enforcement****
****S31 Law Enforcement****

Kind regards,



Lee Freeman
Chief Constable