

Greater Manchester Combined Authority,
Tootal Buildings,
56 Oxford Street,
Manchester M1 6EU

By email only

16 September 2026

Dear Mayor Craig,

We are writing to you as a group of human rights, racial justice, children's rights, police monitoring groups and community organisations concerned about the use of facial recognition technology ("FRT") by Greater Manchester Police ("GM Police"). As the Police and Crime Commissioner for Greater Manchester, **we urge you to oppose the use of facial recognition in your area. This is particularly important at least until a legislative framework has been passed by Parliament to guide the police's use of the technology and safeguard the public's rights.** We expect a Bill will be laid before Parliament in the Autumn.

We are deeply concerned about the risk of discrimination and bias in GM Police's deployment of FRT. The results of a recent Information Commissioner's Office ("ICO") audit in May revealed that GM Police was knowingly, and unapologetically, using an algorithm for retrospective FRT searches which is 100 times more likely to misidentify black women than white women¹ and 250 times more likely to misidentify black women than white subjects generally.² The same algorithm has been shown to have biases for younger people as well as people of colour. Despite this, GM Police has failed to implement any mitigations and has failed to even conduct an Equality Impact Assessment. The continued use of this racist algorithm and failure to apologise demonstrates a stunning disregard for minority communities in Greater Manchester.

It is not only the accuracy of the algorithms themselves, but the decisions about where to deploy the technology and who to add to police watchlists that are of concern. Many residents, including the group Kids of Colour, raised concerns that GM police chose to deploy LFR at Manchester Caribbean Carnival, describing the use of the technology as "an encroachment on people's rights." GM Police should be focusing on building trust with communities, instead of investing in mass surveillance technology which exacerbates discrimination in policing.

1 Liberty Investigates, UK police forces lobbied to use biased facial recognition technology, 10 December 2025, <https://libertyinvestigates.org.uk/articles/police-forces-biased-facial-recognition-technology/>.

2 National Physical Laboratory, Report for Home Office and Office of the Policing Chief Scientific Adviser, October 2025 https://assets.publishing.service.gov.uk/media/693002a4cdec734f4dff4149/1a_Cognitec_NPL_Equity_Report_October_25.pdf.

FRT poses a serious threat to our rights and freedoms. The rollout of mass surveillance technology in public spaces is a privacy intrusion, with a chilling effect on people's ability to exercise their freedom of expression, association and assembly. The deployment of live FRT at large-scale cultural and sporting events, such as the Caribbean Carnival and the Manchester derby, amplifies these effects by subjecting large numbers of people to unwarranted biometric surveillance. Citizens in a liberal democracy rightly expect their state not to routinely surveil them as they go about their lawful business, especially personally sensitive or democratically important business such as accessing health and legal services, voting, engaging in trade union activity, protesting, community organising and speaking with journalists.

People who have done nothing to arouse suspicion do not have to identify themselves to the police. Live FRT turns this presumption on its head, scanning the public indiscriminately and treating everyone as a potential suspect, unless the machine says otherwise. Whilst it is imperative that communities are kept safe, it is disproportionate to transfer the burden of policing onto the entire law-abiding population.

In the absence of a specific legal framework, the police have essentially been allowed to write their own rules for the use of FRT. Despite this permissive regime, The ICO's audit found that GM Police is not even complying with the minimal requirements set out by data protection law. The audit identified 35 priority recommendations for the force, including 25 which were categorised as high or urgent priority.³ The report highlighted that GM Police's failings mean that "information may be accessed inappropriately without any means of detection or audit" and mitigations to "guard against bias" are not in place.⁴ **It is unacceptable for GM Police to continue to deploy FRT given the ICO's findings.**

Legislation governing the use of this technology is expected in the autumn. Given the concerning findings of the ICO report and the apparent need for new regulation, we believe **GM Police must stop their use of FRT – at the very least, until Parliament has spoken.**

We look forward to hearing what action you are taking with regards to this concerning matter. Racist AI surveillance technology should have no place in policing in Greater Manchester.

³ Information Commissioner's Office, Greater Manchester Police: Data protection audit report, 18 August 2026, p5, <https://ico.org.uk/action-weve-taken/audits-and-overview-reports/2026/08/greater-manchester-police/>.

⁴ Ibid, pp8-9.

Yours sincerely,

Silkie Carlo, Director, Big Brother Watch

Neil Frackelton, CEO, Greater Manchester Immigration Aid Unit

John Pearson and Frances Kelly, Greater Manchester Patients Not Passports

Kevin Allsop, President, Greater Manchester Trades Union Congress

Manchester Amnesty International

Jim Killock, Executive Director, Open Rights Group

Caroline Wilson Palow, Legal Director, Privacy International

Christina Tanti, Head of Research, Race Equality First

Farid Vahidi, Chair of Trustees, Refugee and Asylum Participatory Action Research (RAPAR) Manchester

Alamara Khwaja Bettum, Executive Director, Statewatch

Habib Kadiri, Executive Director, Stopwatch

The Citizens Trust - Manchester City Supporters' Union