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Standard Practice for the Generation and Use of Facial Comparison Results as Investigative Leads

1. Scope

1.1 This document provides standard practice on the generation, and use of investigative lead following a facial comparison.

1.2 Other protocols, policies, or procedures established by governing bodies (e.g., agency or legal authorities) are outside the scope of this document; however, they should be considered when utilizing investigative leads.

1.3 Facial comparisons that do not result in investigative leads are outside the scope of this document.

2. Referenced Documents

2.1 *FISWG Standards*:

Minimum Training Criteria When Using Facial Recognition Systems

Guide for Facial Comparison Training of Reviewers to Competency

Principles for Responsible Use of Facial Recognition Technology

Role-Based Training in Facial Comparison

Minimum Guidelines for Facial Image Comparison Documentation

2.2 *Other Standards:*

International Association of Chiefs of Police (IACP), 2026, [Recommended Investigator Training for Verifying Facial Recognition Leads.pdf]

3. Terminology

3.1 *Definitions:*

3.1.1 *Facial image comparison, n*— a manual process to identify similarities or dissimilarities between two (or more) facial images or facial image(s) and a live subject for the purpose of determining if they represent the same person or different person.

3.2 *Investigative Lead, n*—a result from a facial comparison that advances an investigation.

3.2.1 Discussion: This type of facial comparison typically originates from a Facial Recognition search by a law enforcement agency.

3.2.2 *Investigative Lead Report, n*—a document whose intent it is to provide information to operational personnel to assist them with meeting their objective.

3.3 *Acronym:*

3.3.1 *FRS, n*—Facial Recognition System

4. Significance and Use

4.1 A facial recognition search is intended to assist in an investigation. Searching images in a facial recognition system (FRS) should be conducted for an authorized, criminal justice-related purpose. Results produced by an FRS do not confirm identity but suggest potential candidates for further investigation. The candidates shall be reviewed by trained facial practitioners using morphological analysis which may result in an investigative lead.

4.2 Law enforcement personnel, or those acting on their behalf shall use investigative leads in accordance with agency-specific standard operating procedures that align with best practices, privacy considerations, and legislative requirements.

5. Investigative Leads

5.1 **Investigative leads shall be handled with caution, are not positive identification, and do not constitute proof of guilt.**

5.2 Investigative leads can be generated from a facial comparison, which may originate from an FRS.

5.3 Investigative leads may be communicated through various means including, but not limited to, verbal reports or written documentation.

5.4 Regardless of the method of communication, appropriate follow-up actions and investigative procedures shall be conducted to evaluate and address the investigative lead. Examples of investigative activities are provided in Appendix 2.

5.5 Agencies shall establish policies that follow relevant ethical and legal standards for the use of investigative leads.

5.5.1 Policies shall address proper procedures for developing and documenting facial comparison leads, corroboration before initiating legal action, maintaining the chain of custody, and investing in both technology and personnel training.

6. Investigative Lead Reports

6.1 Investigative lead reports are documents whose intent it is to provide information to operational personnel to assist them with meeting their objective. Reports may be in any written form, such as an email or formal report.

6.2 **Investigative lead reports shall be handled with caution, are not positive identification, and do not constitute proof of guilt.**

6.3 All investigative lead reports shall include a disclaimer outlining the intended use and limitations. Recipients of any investigative lead report shall understand the limitations of the report and how to use the report within the investigation. An example of a facial investigative lead disclaimer can be found in Appendix X1.

6.4 Additional investigative steps shall be conducted by the receiver of the investigative lead report. Examples of additional steps can be found in Appendix 2.

7. Use of Investigative Leads or Investigative Lead Reports

7.1 Potential legal implications[1] [2]surrounding the use of investigative lead reports shall be considered to avoid harm to the public.

7.2 Upon receiving an investigative lead or an investigative lead report, an investigator, detective, or analyst **shall:**

7.2.1 Comply with the disclaimer on the investigative lead report.

7.2.2 Refer to it as a “lead only” during verbal, written, and electronic communications.

7.2.3 Correct the language of other investigators who describe the investigative lead as a “hit”, “match”, or “identification”. It should only be referenced as an investigative lead.

7.2.4 Compare the investigative lead to the results of other available evidence including, but not limited to, forensics and biographical information.

[1] Robert Julian-Borchak Williams vs City of Detroit, et al (https://www.aclu.org/cases/williams-v-city-of-detroit-face-recognition-false-arrest?document=Settlement-Agreement)

[2] Nijeer Parks vs McCormac (https://www.aclu.org/cases/parks-v-mccormac?document=Amicus-Brief)

7.2.5 Perform additional investigative activities for vetting leads when applicable. Examples are presented in Appendix X2.

7.3 Upon receiving an investigative lead or an investigative lead report, an investigator, detective, or analyst **shall not:**

7.3.1 Forward or share the investigative lead with other agencies, investigators, or courts without including the complete investigative lead report disclaimer.

7.3.2 Arrest an individual based solely on the investigative lead.

7.3.3 Refer to the investigative lead as a “hit”, “match”, or “identification” during verbal, written, or email communications.

7.3.4 Share the investigative lead or personally identifiable information publicly without lawful authority.

7.3.5 Confirm the identity of an investigative lead *solely* by placing the image in a photo lineup. Further details are presented in Appendix X2.

FISWG documents can be found at: www.fiswg.org

APPENDIX

(Nonmandatory Information)

X1. EXAMPLE OF A FACIAL INVESTIGATIVE LEAD DISCLAIMER

X1.1 This facial image comparison result is not a positive identification. This is an investigative lead only. Any possible connection or involvement with any subject must be determined through further investigation. Further dissemination of this investigative lead needs to follow applicable policies and laws.

X2. EXAMPLES OF ADDITIONAL INVESTIGATIVE ACTIVITIES

X2.1 The following are examples of best practices published by the International Association of Chiefs of Police (IACP) within the document *Recommended Investigator Training for Verifying Facial Recognition Leads (2026).*

X2.2 Before using facial recognition leads as the basis for taking a suspect into custody, administering photo lineups, or taking further legal action, the following minimum investigative checklist is recommended, if applicable:

X2.1.1 Incarceration Status: Verify the subject was not incarcerated at the date and time of the incident.

X2.1.2 Public Records Search: Check for potential identical twins or relatives.

X2.1.3 Open-Source Social Media Review: Look for alibis, geotagged content, or incriminating posts.

X2.1.4 Vehicle Connections: Examine vehicle ownership and location data, including license plate readers and toll transponders.

X2.1.5 Known Addresses: Determine subject proximity to crime scene or links to the area through prior history or relationships.

X2.1.6 Arrest History: Evaluate whether the subject has a criminal history relevant to the crime under investigation.

X2.1.7 Forensic/Biometric Evidence: Reconcile Facial Recognition Technology (FRT) leads with other forensic data (e.g., fingerprints, DNA) to avoid contradictions.

X2.1.8 Conferral Before Arrest: Present the full case context to a supervisor and prosecutor to determine whether probably cause has been sufficiently established.

X2.1.9 Documentation: Document all investigative steps taken in case folder for disclosure.

X2.3 This checklist provides a foundational layer of verification that supports ethical policing and mitigates legal risk. In addition, it will prepare an investigator to support the decision to arrest or exonerate a suspect during cross examination.