

Newsletter

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Message from the Forensic Science Regulator

It's been a year since the last newsletter, reflecting a busy period focused on the core work of regulation. During this time, I am honoured to have been appointed as the Forensic Science Regulator for England and Wales at such a pivotal time for forensic science. We have launched the latest Code of Practice to improve the quality of forensic science evidence.

The role of the Regulator is critical in maintaining the highest standards of quality and integrity across forensic science services. I am committed to working collaboratively with police forces, forensic science providers, the legal profession, and government to ensure that forensic science continues to support the criminal justice system effectively and credibly.

I will continue to actively engage with key stakeholders such as those who sit on the Specialist Groups, as well as visiting police forces and other FSPs. I would like to thank Gary Pugh for his leadership and dedication to forensic science in particular for taking the time to brief me on the current forensic landscape before I took up the role.

I look forward to continuing building on the strong foundations already in place and ensuring that forensic science in England and Wales remains robust, innovative, and trusted.

My Career Journey

My career spans internationally recognised research, standard-setting, and regulatory innovation. I began my scientific journey in research roles at the University of Cambridge, Tufts University, and the MRC Laboratory of Molecular Biology, where I focused on advancing the understanding and treatment of infectious diseases. These roles allowed me to collaborate closely with academia and industry, translating research into practical solutions.

At the National Physical Laboratory, I established and led the Biotechnology Research Group, developing standards and reference materials for the biopharmaceutical and diagnostic sectors. Ensuring alignment with ISO standards was a key part of this work, helping to build trust and consistency in critical health technologies.

Later, I joined Nokia Technologies, where I gained expertise in digital standardisation and led research and business strategies in digital health. Managing international teams and driving innovation in nanotechnology and health technologies gave me a unique perspective on the intersection of science and technology.

My regulatory career developed at the Medicines and Healthcare products Regulatory Agency (MHRA), where I held senior positions, including Director of the National Institute for Biological Standards and Control (NIBSC). In these roles, I implemented pragmatic regulatory approaches and frameworks aligned with ISO and WHO standards.

As Chief Science, Research and Innovation Officer at MHRA, I led the largest overhaul of UK clinical trials legislation in over 20 years. This work introduced a streamlined, flexible framework that reduced approval times, integrated regulatory reviews, and set new standards for innovation and patient safety.

Now, as the Forensic Science Regulator, my focus is on strengthening forensic science standards, ensuring quality, and promoting accountability across the criminal justice system. I am committed to working with stakeholders to uphold scientific integrity and public confidence in forensic evidence.

- Dr. Marc Bailey
- Forensic Science Regulator

Cell Site Collaborative Learning Exercise

The Regulator decided to commission a Collaborative Learning Exercise (CLE) for providers conducting Cell Site Analysis for geolocation, involving Radio Frequency Propagation Surveys (RFPS), to support all forensic units in achieving compliance with the Code and accreditation.

The Regulator's Code of Practice stipulates that method validation typically requires participation in proficiency test schemes, interlaboratory comparisons, or collaborative exercises where they are available. Participation in such schemes provide a mechanism for teams using telecom operator-supplied data and RFPS to monitor the validity of their examinations and to compare their performance against their own requirements and the performance of other forensic units.

The Regulator had worked with the Forensic Capability Network (FCN) to develop a suitable scheme, for police forces and for commercial partners. In designing the collaborative exercise, FCN placed emphasis on reflective practice and titled it a Collaborative Learning Exercise. This CLE assesses provider proficiency in the FSA, and participation supports compliance with the Code of Practice and will be monitored by the Regulator.

Consultation on New Legal Framework for Biometrics and Facial Recognition

The Forensic Science Regulator notes the Home Office's launch of the consultation titled "A New Legal Framework for Law Enforcement Use of Biometrics, Facial Recognition and Similar Technologies." This consultation seeks views on establishing a statutory framework to govern the use of advanced biometric technologies by law enforcement, ensuring their deployment is lawful, proportionate, and transparent.

The Government proposes to create a regulatory and oversight body to oversee law enforcement use of biometrics, facial recognition and similar technologies. This is likely to encompass and build upon the existing roles of the Biometrics and Surveillance Camera Commissioner and the Forensic Science Regulator in England and Wales.

Stakeholders can review the consultation document and submit responses via the <u>Home Office consultation template</u>

The Regulator encourages forensic practitioners, law enforcement, and technology providers to engage with this process to help shape a framework that balances innovation with public confidence and justice.

Declarations webinar

On 20th October 2025, the Regulator hosted a webinar with approximately 200 participants which covered the key considerations for practitioners when declaring compliance or non-compliance. Topics included declaration wording, the transition from version 1 to version 2 of the Code, updates to mitigation tables, and a preview of the forthcoming revised Declaration Guidance document.

Many questions submitted before and during the event were discussed in the session, all the feedback received will be used to develop version 3 of the Declaration Guidance due before Christmas.

The Regulator would like to thank everyone who attended and contributed questions.

Code version 2 transition

Following the publication of version 2 of the Regulator's Code of Practice, there was a transition exercise for the 63 organisations with Code version 1

on their schedules of accreditation. 60 organisations have been granted accreditation to the Code of Practice version 2 following demonstrable compliance via a desktop review undertaken by UKAS and the relevant schedules of accreditation have been updated and published on the UKAS website. Code version 1 has been removed from the schedules of accreditation.

Since Code version 2 coming into force on 2nd October 2025 there have been key changes to the following FSAs:

Transitional Arrangements

Three FSAs have extended timelines for specific compliance requirements:

- FSA-INC-100 Incident scene examination
- FSA-DTN-102 Toxicology: analysis for drugs under s5A Road Traffic Act 1988
- FSA-MTP-101 Friction ridge detail: comparison

New Declaration Requirements

Two FSAs now require declarations of compliance or non-compliance:

- FSA-BIO-100 Forensic medical examination of complainants
- FSA-DIG-200 Cell site analysis for geolocation

SARC communications and updates

Since 2 October 2025 Sexual Assault Referral Centres (SARCs) conducting FSA – BIO 100 the forensic examinations of sexual offence complainants are subject to statutory regulation for the medical forensic science aspects of their services. To demonstrate compliance, SARCs must comply with the Code of Practice which includes accreditation to ISO 15189:20224, with the Code

included in their accreditation schedule. All SARCs will now need to declare their compliance to the Code.

The office of the Forensic Science Regulator (OFSR), and the medical forensics specialist group (MFSG) have updated the guidance that support SARCs. These have been published in FSR-GUI-0017-https://www.gov.uk/government/publications/dna-contamination-controls-forensic-medical-examinations and FSR-GUI-0020 - Forensic medical examination of sexual offence complainants (FSR-GUI-0020) - GOV.UK.

In addition, the Forensic Capability Network (FCN) has worked closely with SARCs over the last four years to underpin scientific and operational practice and support SARCs to work towards achieving compliance with the Code. A webinar on declarations was delivered by the FCN on 16 October accompanied with a SARC specific guidance to enable SARCs to develop their standing operating procedure for maintaining and updating information to support their practitioners completing their compliance declaration going forward. The FCN will finalise and issue the SARC declaration guidance when the FSR declarations guidance is published.

Significant progress has been made in demonstrating partial compliance and upgrading of facilities, ensuring that evidence collected by SARCs while they work towards compliance is of sufficient quality to support the Criminal Justice System while the patients that attend the SARCs receive the care that they need.

A few SARCs have already been recommended for accreditation and therefore compliance to the Code, with final approval expected within three months, subject to the successful resolution of assessment findings.

Progress towards compliance will be monitored.

Incident scene update

In September 2025, the Regulator contacted all police forces in England and Wales believed to be conducting FSA INC 100 Incident Scene Examinations. The purpose was to inform them that the scheduled requirement for ISO/IEC 17020 accreditation, originally set for April 2027, is now under review, with a possible extension being considered.

The Regulator received a report from the Incident Examination Specialist Group, which recommended extending the deadline and adopting a milestone-based approach to achieving compliance. The Regulator has expressed support for the milestone approach, provided there is clear assurance that organisations will continue progressing towards full compliance and meet defined milestones within agreed timeframes.

In response, the Regulator has established a small focus group that includes representatives from law enforcement, specialist group chairs, the Forensic Capability Network, and UKAS. The group's remit is to explore the structure of potential milestones, oversight mechanisms, compliance monitoring, and appropriate timelines.

The first meeting of the focus group took place in November and resulted in several positive actions. A follow-up meeting is scheduled for December. The Regulator remains committed to this collaborative effort and to the open sharing of challenges and perspectives, with the collective aim of informing a more pragmatic and proportionate approach to the regulation of incident scene examination. Forces will be kept informed in a timely manner about the outcome of the review and any resulting decisions.

Support for FRD Transition to version 2

The Regulator's Fingerprint Quality Standards Specialist group have convened a working group to support the FRD community in transitioning to the requirements of version 2 of the Code.

The working group has drawn together stakeholders from across the community, along with representatives from UKAS and FCN to develop a checklist to support bureaux in achieving the new requirements. This support, along with additional ground truth data, will be delivered through FCN to enable forces to transition in a proportionate and consistent way.

Interpretation guidance development

Building on previous work by the Regulator on the development of evaluative opinions, a new guidance document - Interpretation for Forensic Science Activities - is being developed to set out principles of interpretation across all forensic science activities. This guidance aims to support the delivery of expert opinions that are balanced, robust, transparent, and logically reasoned within the Criminal Justice System.

The document has been drafted by a specialist group convened by the Forensic Science Regulator. This group includes experts from the forensic science community, academia, and the legal profession, and was established to improve consistency in how interpretation is applied and communicated in forensic science.

The document is currently undergoing a targeted consultation with an aim to publish early in the new year.

New compliance portal

In the Regulator's first annual report, the compliance survey was highlighted as essential but costly and time-consuming to administer. Feedback from organisations completing the survey revealed a number of frustrations with the previous tool, which required responses for every Forensic Science Activity (FSA) in sequence and all data to be re-entered annually despite minimal changes. To reduce this burden, the Home Office invested in a new survey platform, delivered in time for the July 2024–July 2025 cycle. While the platform was launched, challenges in configuring functionality and reporting requirements caused delays in its full implementation.

In the survey for July 2024–July 2025 cycle, 81 organisations took part, and provided a response.

The new portal allows organisations to select relevant FSAs upfront, ensuring only applicable questions appear. Most users can view, and reuse data submitted via the portal, streamlining future returns. However, due to time constraints, historical data could not be migrated, so previous information must be re-entered for this cycle. The platform is still evolving, with further improvements planned to minimise duplication and simplify compliance reporting.

We would like to thank all organisations that took part in the current survey cycle. Your contribution has been invaluable in supporting the development of the survey platform.

Publications from March 2025

New and updated publications

Since March 2025 the following publications have been developed or updated.

Publications since March 2025

Document type	Document title	Publication date
Guidance	Guidance: Y-STR profiling, FSR-GUI-0013 Issue 2	6 th March 2025
Report	Statutory consultation on the Code of Practice version 2	24 March 2025
Report	Regulation of incident scene examination and implementation of change	15 th May 2025
Notification	Regulator's notification 01- 2025: FSA-BIO-100	3 rd July 2025
Notification	Regulator's notification 02- 2025: drug testing kits	17 th July 2025
Guidance	Guidance: Bloodstain pattern analysis, FSR-GUI-0021	17 th July 2025
Report	Forensic Science Regulator annual report for 2023 to 2024	22 nd July 2025
Notification	Regulator's notification 03- 2025: declarations	29 th August 2025
Guidance	Guidance: DNA contamination controls – Forensic medical examinations FSR-GUI-0017 Issue 2	24 th September 2025
Guidance	Guidance: Forensic medical examination of sexual offence complainants FSR-GUI-0020 Issue 2	10 th October 2025

Season's Greetings

On behalf of the Forensic Science Regulator and the Office of the Forensic Science Regulator, we would like to extend our warmest wishes to all our stakeholders and partners. Thank you for your continued support and collaboration throughout the year.

Wishing you a joyful festive season and a successful year ahead!

Contact details

If you have any comments or feedback on this newsletter, please contact the Regulator via the following routes:

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