



Victorian Council for Civil Liberties Inc

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Councillors  
Alison Leighton  
Chief Executive Officer  
Melbourne City Council

15 May 2025

Dear Councillors and Ms Leighton,

**An open letter to the city of Melbourne:  
Facial recognition technology is not the future we want**

The Victorian Council for Civil Liberties, known as Liberty Victoria, is one of Australia's leading civil liberties organisations. We have worked to defend and extend human rights and freedoms in Victoria since 1936.

We write to express our opposition to Melbourne City Council's proposed use of facial recognition technology in public spaces across our city.

This technology represents a significant intrusion into the privacy of every individual who lives in or visits Melbourne. We do not believe that the proposed surveillance is a reasonable or proportionate limitation on Melbournians' human rights. We also have serious concerns about whether it is lawful under the *Charter of Human Rights and Responsibilities Act 2006* (Vic) (**Charter**).

Our reasons for opposing the use of facial recognition technology are as set out below.

First, there is **no clear evidence that facial recognition technology is needed** in the City of Melbourne. Importantly, police already have access to CCTV footage when serious incidents occur. Without any proven need for facial recognition, we consider its implementation to be unjustifiable.

Second, we consider the **privacy risks** with this type of surveillance to be immense.

Facial recognition captures and stores highly personal and sensitive biometric data. This brings up significant questions which appear to currently be unanswered, including where and how the data will be stored, for how long, and what protections will be in place to prevent misuse or breaches. Recent years have shown us that data leaks are disturbingly common, including from sophisticated entities such as courts.

The involvement of artificial intelligence and third-party technology companies—often based overseas—only heightens these risks. Once collected, this data can be repurposed, shared, or exposed in ways that have not been consented to.

Third, we note that there are real questions about whether this type of technology is **consistent with privacy laws**. We need only look to the Australian Information Commissioner's recent ruling against Bunnings for unlawfully using facial recognition technology. Customers' sensitive data was collected without consent and without adequate notification. This serves as a stark warning.

Finally, we note that there is a proven risk of **racial bias** with facial recognition technology. Numerous studies have shown that facial recognition algorithms are significantly less accurate for people of colour. If the use of this technology makes it more likely that people of colour will be the subject of inaccurate police reports, we consider that it may not be consistent with the Charter, which gives every Victorian the right to equality before the law.

Beyond legality and policy, there is a broader issue at stake: **the kind of city we want to live in** a city where people feel constantly surveilled is not one that fosters community, safety, or trust. Melbourne must remain a place where civil liberties are respected and upheld.

If crime is a concern, we urge our leaders—at all levels—to be smart on crime. Investment in community-based, evidence-informed solutions is the path forward.

We call on the City of Melbourne to abandon any plans to implement facial recognition technology in public spaces and to commit to upholding the privacy, equality, and dignity of all residents and visitors.

Sincerely,

**Michelle Bennett**  
**President, Liberty Victoria**