Technical Bulletin: Your questions about the Forensic Science Regulator Code of Practice transition in relation to Friction Ridge Detail - Comparison Specific Requirements

04 March 2026

This update has been developed in response to customer questions received in relation to the transition to the FSR Code of Practice Version 2 (V2) for FSA – MTP101.

The corresponding publication that provides essential context for these questions was published on 30 October 2025 and can be accessed directly using this link:

+ **Technical Bulletin - FSR CoP V2 transition - FSA-MTP 101**

We have compiled the frequently asked questions below in summary form. For further clarification or questions not covered here, please contact us through our dedicated email address: **FSRCoPTransition@ukas.com**.

The questions and answers below are specific to the transition to the FSR Code of Practice V2 for FSA – MTP101: Friction ridge detail: comparison and offers guidance on key matters.

The sub-activities for FSA-MTP 101 lists 'mark-to-mark comparison of friction ridge detail'. Our Bureau currently does not perform mark-to-mark activities and will not be able to offer evidence of this in the transition document. In this scenario, will it still be possible to transition to V2 for MTP-101?

The transition will cover your existing scope only and is not a means for a forensic unit to extend into other sub-activities, which is to be done by submitting an AC4 application to UKAS. If the unit does not conduct scene linking (mark to mark), then there is no need for the unit to validate or demonstrate this in order to undergo the transition.

Most units are accredited within their scope for Direct comparison of person(s) of interest (mark to print); therefore, in these cases the transition will only cover this activity. The unit shall ensure all sources of FRD (finger, palm, plantar, phalange) and all inputs (lifts, images etc) are captured in their validation for mark to print comparison.

If our GTD does not include cadaver marks, which are proving difficult to source, would we still be able to transition to V2?

Cadaver Marks fall under the sub-activity for identity check (print to print). If the unit does not currently have identity check within the scope then it does not fall under this transition. If the unit wishes to incorporate identity check in their scope of accreditation this would require an AC4 application submission to UKAS and this will be dealt with separately to their transition.

To be compliant to the Code do we need to be accredited for the 4 fingerprint services / sub activities listed in clause 96.2.1 (Searching, Identity check, Scene Linking and Direct Comparison)?

The unit only needs to demonstrate compliance to the Code V2 for the services that they undertake. For example, if you do not deliver a scene linking service then this does not need to be accredited in order to demonstrate compliance

If we can demonstrate successful transition for direct comparison, will we have our schedule of accreditation amended so that we are still accredited under V2 of the Code (for this service of the FSA only)?

This is correct, successful applicants will have their schedule of accreditation amended to reflect compliance to the Code V2, Specific Requirements for FRD Comparison, MTP-101.
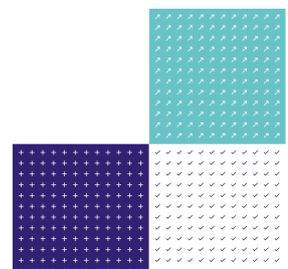
Where do 'digital images' fit into this - if they count under the direction comparison element does that mean we will lose our accreditation for this sub activity unless we validate digital images under a separate ETS before the deadline? (or could we treat it as an infrequently used method?)

If the unit delivers a service for comparison of Images of Friction Ridge Skin (also known as 3D FRD, Digital FRD and comparison of open source images), this would be treated as an extension to scope exercise, like that of a sub-activity as defined by the FSR. If you do not deliver this service, then there is no requirement to achieve accreditation to comply with the Code V2.

Regarding reference to infrequent tests, the codes state that:

"24.2.16. If these activities are to become part of the routine activities of the forensic unit (i.e. used more frequently than once every three months), and the FSA requires it, accreditation shall be sought, and declarations shall reflect any non-compliance."

The unit will need to determine how frequently they are using the method to see if it meets the requirements outlined in clauses 24.2.8 – 24.2.16. However, please note clause 24.2.10 regarding the FSR's determination on 'Infrequently used methods' when making any decisions.

If we have direct comparison and Ident1 searching accredited and the other two sub-activities are treated as infrequently used methods, will we still be able to be accredited to the Code?

Yes, so long as the requirements for infrequent testing are met in accordance with clauses 24.2.8 – 24.2.16 as detailed above. However, please note clause 24.2.10 regarding the FSR's determination on 'Infrequently used methods' when making any decisions.

For the service / sub activity of 'identity checking', as this would include comparison of mortuary impressions, are simulated mortuary impressions something that can be added to our GTD in the same way that plantar impressions will be and therefore would this be able to be covered in the same transition review work or would this require a further extension to scope?

If appropriate, the unit should submit an AC4 to UKAS for identity checking and ensure that all inputs and sources of FRD are covered in the validation and within the procedure. If mortuary impressions are received as part of this service, then these should be included. Identity check will need to be applied for by submission of an AC4 application and will not form part of the transition, which is focused on the current scope of accreditation only. The lab will need to determine how best to populate its GTD with representative marks/impressions of the work encountered, which could include, among others, simulation.

Under this service / sub activity, for tenprint-to-tenprint comparisons for live identity checking, could this form part of the AFIS validation extension to scope or would it require a separate one?

The unit can define the scope of accreditation it wishes to apply for in a single AC4 application. The Assessment Manager will review this application and determine the best assessment approach. Alternatively, if multiple activities are to be applied for and they have differing delivery timelines it may be recommended to submit separate applications to allow for grant of accreditation where an activity is ready over those that are not.

I want to achieve accreditation for a sub-activity that is currently not on my scope of accreditation. Can I do this through the transition template?

No. The transition covers the units existing scope of accreditation only. It does not cover the addition of new sub-activities which are to be assessed via an AC4 application for an extension to scope.

Is the use of IDENT1 an additional ETS as this is not currently listed on our Schedule of Accreditation?

Yes. This is correct. The transition covers the existing scope only. An ETS application will be required for the use of Ident1.