



## EQUALITY IMPACT ASSESSMENT (EIA)

### Live Facial Recognition

<b>Product Description:</b>	Facial Recognition Technology, Live Facial Recognition (LFR)
<b>Project Lead:</b>	C/Supt Thornton (SRO Facial Recognition) C/Insp Iain Wyke (LRO Live Facial Recognition) Sarah Riley (DF Thematic Lead) Project Manager – TBD
<b>EIA Author:</b>	Sarah Riley/ Sgt Chris Hilton
<b>EIA Start Date</b>	14.11.2025
<b>Date of last review</b>	<b>18.11.2025</b>
<b>Date of next review</b>	

Version	Date Issued	Brief Summary of Change	Owner's Name
V1	18/11/2025	Initial Completion	Sarah Riley / Chris Hilton

This document is to be used in conjunction with the EIA GUIDANCE. If you do not have a copy of this or would like further information, please contact:

[inclusion@merseyside.police.uk](mailto:inclusion@merseyside.police.uk) .

Please provide a brief overview of your policy, practice or the change you plan to make including the intended aims and outcomes

**Aims and Objectives**

The purpose of this Equality Impact Assessment is to ensure that the deployment of Live Facial Recognition (LFR) technology by Merseyside Police is fair, transparent, and compliant with the Equality Act 2010. The aims are:

- To provide clear guidance on planning, deploying, and reviewing LFR.
- To ensure proportionality and necessity tests are applied before each deployment.
- To maintain public trust through transparency and engagement.

### **Evidence Base**

This assessment draws on independent research and national guidance, including:

- National Physical Laboratory (NPL) Equitability Study  
[frt-equitability-study\\_mar2023.pdf](#)  
[Operational Testing of Facial Recognition Technology](#)
- National Institute of Standards and Technology (NIST) algorithm performance reports  
[Face Recognition Technology Evaluation \(FRTE\) 1:1 Verification](#)  
[NIST Report on Facial Recognition- A Game Changer.pdf](#)
- ICO Opinion on LFR (2019)  
[The use of live facial recognition technology by law enforcement in public places](#)  
[ico-opinion-the-use-of-lfr-in-public-places-20210618.pdf](#)
- London Policing Ethics Panel reports  
[live facial recognition final report may 2019.pdf](#)  
[Five Years On - Reviewing the development and deployment of Live Facial Recognition by the MPS](#)
- Alan Turing Institute research on algorithmic fairness  
[Understanding bias in facial recognition technologies | The Alan Turing Institute](#)
- Academic studies (e.g., Gender Shades, Klare et al.)  
[Gender Shades](#)  
These sources inform our understanding of bias, demographic performance, and ethical considerations.

The force is looking to adopt their own facial recognition technology. There are three methods of facial recognition. Live, Officer Initiated and Retrospective they will all require assessment for equality based on the usage and users of the tools. Facial recognition has been successful in improving positive outcomes, locating offenders and building an intelligence picture.

## **Live Facial Recognition Technology in UK Policing**

Live Facial Recognition (LFR) involves the use of overt cameras to monitor a live location and compare identifiable faces against a pre-determined watchlist of images. This technology is designed to assist policing in locating high-harm offenders, safeguarding vulnerable individuals, and preventing crime in real time.

There is a national interest for the wider adoption of LFR, coordinated by the National LFR Team under the NPCC, which provides strategic oversight, guidance, and funding for forces across England and Wales. The Home Office has invested in a fleet of Mercedes Sprinter vans equipped with LFR technology, which are being rolled out to selected forces under a regional deployment model.

Greater Manchester Police (GMP) has been designated as the regional lead for the Northwest, hosting two LFR vans supplied by the Home Office. These vans are fitted with advanced camera systems and software capable of scanning faces in crowded environments and matching them against bespoke watchlists. GMP's role includes supporting other forces in the region with operational guidance, training, and sharing best practice.

The technology currently deployed uses the NEC NeoFace algorithm, which has undergone independent testing by the National Physical Laboratory (NPL) and the National Institute of Standards and Technology (NIST) to ensure fairness and accuracy across demographic groups. Safeguards include strict watchlist criteria, immediate deletion of non-matching images, and transparency measures such as public notifications and signage during deployments.

Merseyside Police will adopt performance benchmarks aligned with NPL recommendations using the NEC Neoface system, including a false alert rate of less than 1 in 1,000 and a minimum match threshold of 0.64. These metrics will be monitored and reported after each deployment

Training for LFR operators is mandatory and delivered nationally, with a one-day course required to obtain certification.

Oversight and governance will take several forms such as Merseyside Independent Advisory Group, and quarterly PCC Scrutiny. Internal governance will sit in several structures such as ACC led Gold Public Order Public Safety, and community feedback will be discussed in ACC led Quarterly Trust and Confidence Board. LFR policy and compliance with College of Policing Authorised Professional Practice (APP) are key in ensuring deployments are intelligence-led, proportionate, and time-bound.

**1. Establishing Necessity**

What relevance does this proposal / policy have to:		Please consider both the impact on: Internal staff & working practices External community & service delivery	
A	Age	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B	Sex	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
C	Sexual Orientation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
D	Gender Identity/Reassignment	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
E	Religion or Belief	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
F	Race	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
G	Pregnancy, Maternity, Paternity	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
H	Marital and Civil Partnership	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
I	Neurodiversity	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
J	Disability	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
K	Other Issues including socio-economic and caring responsibilities	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

**2. Why do you believe there may be / may not be an impact and what have you done to check this?**

IMPACT LOG				
Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring
<p><b>AGE:</b></p> <p><b>External</b></p> <p>Concerns may be raised that the algorithm may be biased.</p>	<p>Merseyside Police does not own an LFR solution but will utilise nationally approved technology operated by other forces or provided through the NPCC programme. Importantly, Merseyside Police will only use technology that has been independently tested and validated by the National Physical Laboratory (NPL) and the National Institute of Standards and Technology (NIST) to ensure fairness, accuracy, and compliance with equality standards.</p> <p>Due consideration of NPL testing indicates that the NEOFACE technology, deployed correctly, mitigates race, gender and age.</p> <ul style="list-style-type: none"> <li>• Ensure that the National Institute for Science and Technology (NIST) statistics for the algorithm Merseyside’s facial recognition tool use are submitted regularly to ensure the tool remains to be monitored for bias.</li> <li>• In compiling watchlists the AO and LFR operators should pay due regard and consideration age, such as Is the person’s age relevant to the risk they pose? or could inclusion be excessive or unjustified given their age? and</li> </ul>	<p>Sgt Chris Hilton</p>		<p>The Metropolitan Police Service (MPS) and South Wales Police (SWP) have commissioned testgin with the <a href="#">National Physical Laboratory</a> (NPL). The NPL is a world-leading centre of excellence that provides cutting-edge measurement in science, engineering and technology.</p> <p>Thanks to previous testing by the <a href="#">National Institute of Standards and Technology</a> (NIST) the MPS and SWP knew that their FRT used a high performing algorithm; the aim of the testing was to develop an in-depth understanding of the performance of the algorithms when it was being used in an operational environment. The three policing use cases were:</p> <ul style="list-style-type: none"> <li>• Live Facial Recognition (LFR)</li> <li>• Retrospective Facial Recognition (RFR)</li> <li>• Operator Initiated Facial Recognition (OIFR)</li> </ul> <p>The NPL test plan was specifically designed to help identify any impact this technology may</p>

	<p>consider proportionality and justification for inclusion.</p> <ul style="list-style-type: none"> <li>• The final decision to engage with a subject identified remains with the officer based on NDM decision. This allows for a considered, human input which further supports equality for groups.</li> <li>• This technology is already deployed in the MET and S/Wales police. There is national training provided to operators to ensure that the system is tested for every use, this is set up to run for an hour with a “blue watchlist” which is a training watchlist of officers and staff to ensure the system is in working order prior to deployment.</li> </ul>			<p>have on any protected characteristics, in particular race, age and sex.</p> <p><a href="#">Facial Recognition Technology in Law Enforcement Equitability Study'</a></p> <p>Summary of activity</p> <ul style="list-style-type: none"> <li>• To ensure Live Facial Recognition (LFR) is used lawfully, ethically, and with public confidence, we will integrate its deployment into existing scrutiny structures and adopt robust transparency measures.</li> <li>• LFR deployment plans and outcomes will be presented to the <b>Public Encounters Group (PEG)</b> for ethical review, focusing on proportionality, necessity, and community impact.</li> <li>• We will also share watchlist and deployment data with the <b>Merseyside Independent Advisory Group (MIAG)</b> to ensure minority communities are not disproportionately affected.</li> <li>• Additionally, independent members will be invited to participate in <b>scrutiny panels</b>, reviewing demographic data and operational justifications.</li> <li>• <b>Publishing Clear Reports</b> We will publish regular summaries of LFR deployments, detailing locations, reasons for use, number of scans and matches, arrests or interventions, and</li> </ul>
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				<p>equality impact considerations such as age, ethnicity, and gender.</p> <ul style="list-style-type: none"><li>• <b>Community Consultation</b> We will hold public engagement sessions to explain why LFR is being used, how watchlists are compiled, and what safeguards exist for privacy and equality. Feedback will be gathered and addressed openly.</li><li>• <b>Data and reports</b> will be provided into relevant scrutiny panels and meetings to ensure transparency once the system is deployed to Merseyside.</li><li>• An authorisation process is in development; this will be formally recorded and signed off by senior officers.</li><li>• Deployment locations will be published on the force website; signage will be posted on lampposts and leaflets handed out. Clear signage will be displayed when the tool is deployed to ensure the operation of facial recognition is transparent.</li><li>• Independent scrutiny panels will review deployments quarterly. Community Impact Assessment will be updated after each deployment.</li></ul> <p>In line with the College of Policing Authorised Professional Practice (APP) on LFR, we recognise that age can influence both the likelihood of being included on watchlists and</p>
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				<p>the potential for disproportionate impact during deployments. Younger and older individuals may present unique challenges in facial recognition accuracy due to physiological differences (e.g., facial development or age-related changes).</p> <p>To mitigate these risks, officers will:</p> <ul style="list-style-type: none"> <li>• <b>Apply proportionality and necessity tests</b> before including individuals on watchlists, ensuring age is not a factor unless operationally justified.</li> <li>• <b>Follow APP guidance</b> by considering whether the deployment location or context could disproportionately affect specific age groups (e.g., schools, youth events, care facilities).</li> <li>• <b>Ensure oversight and review</b> of watchlists and deployment plans to identify and address any unintended age-related bias.</li> <li>• <b>Provide clear communication</b> to the public about the purpose and safeguards of LFR, including how age-related considerations are managed.</li> </ul> <p>These measures aim to uphold fairness, transparency, and compliance with equality legislation while maintaining operational effectiveness.</p>
<p><b>SEX:</b> <b>External</b></p>	<p>As above - Due consideration of NPL testing indicates that the NEOFACE technology, deployed correctly, mitigates race, gender and age.</p>	<p>Sgt Chris Hilton</p>		<p>As above re NPL, NIST, Equability Study  <a href="#">National Physical Laboratory</a>  <a href="#">National Institute of Standards and Technology</a></p>

<p>Concerns may be raised that the algorithm may be biased.</p>	<p>The final decision to engage with a subject identified remains with the officer based on NDM decision. This allows for a considered, human input which further supports equality for groups.</p>			<p><a href="#">Facial Recognition Technology in Law Enforcement Equitability Study'</a></p> <p>See summary of activity above</p>
<p><b>SEXUAL ORIENTATION: N/A</b></p>	<p>There is no anticipated differential impact to this group</p>	<p>Sgt Chris Hilton</p>		
<p><b>GENDER IDENTITY/REASSIGNMENT:</b></p> <p><b>External</b> - Concerns may be raised that the algorithm may be biased.</p>	<p>As above - The final decision to engage with a subject identified remains with the officer based on NDM decision. This allows for a considered, human input which further supports equality for groups.</p> <p>Photograph may show results for pre-transition details which may impact on identification.</p>	<p>Sgt Chris Hilton</p>		<p>As above re NPL, NIST, Equability Study <a href="#">National Physical Laboratory National Institute of Standards and Technology Facial Recognition Technology in Law Enforcement Equitability Study'</a></p> <p>See summary of activity above</p>
<p><b>RELIGION OR BELIEF:</b></p> <p><b>External</b> - Concerns may be raised that the algorithm may be biased.</p>	<p>As above - The final decision to engage with a subject identified remains with the officer based on NDM decision. This allows for a considered, human input which further supports equality for groups.</p> <p>The wearing of religious headwear or coverings and the growing of facial hair may have an impact on the effectiveness of FRT. In addition, certain cultures or sexes within a religion. Sensitivity therefore needs to be taken with cross-community dialogue to ensure the deployment is both necessary and proportionate.</p>	<p>Sgt Chris Hilton</p>		<ul style="list-style-type: none"> <li>Under Section 60AA of the Criminal Justice and Public Order Act 1994, police officers have the power to require individuals to remove items worn wholly or mainly to conceal identity. This power can only be authorised by an Inspector or above, and only where there is a reasonable belief that such coverings are being used in connection with violence or disorder. The authorisation must specify a defined locality and time</li> </ul>

	<p>Article 9 (freedom of thought, conscience and religion), in the context of where an LFR deployment is located, as well as the clothing that people wear. In normal circumstances (other than when a section 60AA Criminal Justice and Public Order Act 1994 order is in place), the police do not have a legal power to require persons to remove clothing simply because they are passing the LFR system. Officers should make use of the National Decision Model (NDM) when considering requests to remove articles of clothing.</p> <p>While this power is essential for public safety, its application can impact individuals wearing religious face coverings such as the niqab or burka. To mitigate this, officers will be instructed to apply the power only when necessary and proportionate, and to offer private spaces and same-gender officers for removal where possible. Clear communication of the legal basis and respectful handling will be key to balancing operational needs with equality and human rights obligations.</p>			<p>period, typically up to 24 hours, extendable by a Superintendent for a further 24 hours. Such is reviewed at PEG – Public Encounters Group.</p>
<p><b>RACE:</b></p> <p><b>External</b> - Concerns may be raised that the algorithm may be biased.</p>	<p>As above - The final decision to engage with a subject identified remains with the officer based on NDM decision. This allows for a considered, human input which further supports equality for groups</p> <p>Merseyside is a diverse multi-cultural area. It is therefore important to ensure that the technology is not</p>	<p>Sgt Chris Hilton</p>		<p>To date, ethnicity biases have received considerable attention, particularly from academics and government bodies. Relevant studies include Klare et al (2012), NIST (2018) and Buolamwini and Gebru (2018). The findings from Buolamwini and Gebru's study were widely reported, as they found algorithms were particularly biased in terms of gender and ethnicity: performance was best for men and</p>

	<p>seen to cause concern to people of different race/ethnicity.</p> <p>FRT is based on the mapping of key facial indicators. They are also dependant on the ability of the algorithm to determine the key facial indicators within an image. This can be impacted by environmental factors such as ambient light and shadows factors. This may also be impacted by the depth of skin pigmentation, and the use of contouring make- up.</p>			<p>white individuals, and poor for women and black individuals.</p> <p>See NPL, NIST, Equability Study</p> <p><a href="#">National Physical Laboratory National Institute of Standards and Technology Facial Recognition Technology in Law Enforcement Equitability Study'</a></p> <p>See also summary of activity above</p> <p>Engagement at PRAP (Police Race Action Plan Stakeholder Meeting) has recommended work with young black males to socialise LFR and how this works and increase understanding to minimise belief that they are over policed, and this is a tool to do so.</p>
<b>PREGNANCY OR MATERNITY/ PATERNITY: N/A</b>	There is no anticipated differential impact to this group	Sgt Chris Hilton		
<b>MARITAL AND CIVIL PARTNERSHIP: N/A</b>	There is no anticipated differential impact to those who are married or in civil partnerships.	Sgt Chris Hilton		
<b>NEURODIVERSITY:</b>	Internal	Sgt Chris Hilton		Training and briefings will cover this.

<p><b>Internal-</b> There may be challenges to using the tool</p> <p><b>External:</b> Our engagement with individuals who may be neurodiverse and concerned around the use of the technology and how officers engage.</p>	<p>LFR Policy has been sent for consultation to all staff network and associations as the Police Federation and Unison</p> <p>Training and operational procedures will include reasonable adjustments for neurodiverse and disabled staff, such as alternative learning formats and assistive technologies. Consultation with staff networks will guide these adaptations.</p> <p>External</p> <p>See the below re disability</p>			
<p><b>DISABILITY:</b></p> <p><b>External:</b> People can undergo facial change for several reasons. They may suffer facial disfigurements through trauma or a medical intervention, or their face may have reconstructive surgery. Genetic conditions such as neurofibromatosis also cause progressive facial change.</p> <p><b>Internal-</b> There may be challenges to using the tool.</p>	<p>The use of Live Facial Recognition (LFR) must take account of individuals with disabilities to ensure compliance with the Equality Act 2010. This includes considering accessibility during deployments, the potential for false matches for those with facial differences or medical conditions and ensuring reasonable adjustments when engaging with neurodiverse individuals or those with cognitive impairments.</p> <p>In compiling watchlists due LFR operators should review APP with regard to disability (where data is available) and consider proportionality and justification for inclusion. For example, if an individual has a facial difference that may affect recognition accuracy, this should be factored into operational decisions to avoid unnecessary inclusion or misidentification.</p>	Sgt Chris Hilton		<p>Training and briefings will cover this</p> <p>The LFR Policy has been sent for consultation to all staff network and associations as the Police Federation and Unison. No representations made.</p> <p>This will require engagement with the disability network to assess if any neurodiversity considerations or adaptations need to be made/if they can be made.</p>

	<p>The final decision to engage with a subject identified remains with the officer based on NDM decision. This allows for a considered, human input which further supports equality for groups.</p>			
<p><b>OTHER ISSUES INCLUDING SOCIO-ECONOMIC AND CARING RESPONSIBILITIES:</b></p> <p><b>External</b> – Public perception and understanding of the use of the tool.</p> <p><b>Internal</b> – When using LFR technology, wanted individuals may be identified, the individual may be wanted for low level offences that occurred several years ago.</p>	<p>In stakeholder meetings with PRAP, MIAG, community leaders, and local authority Chief Executives, Merseyside Police will continue to provide clarity on the types of locations where Live Facial Recognition (LFR) may be deployed—such as city centres, major transport hubs, and large public events—without disclosing exact locations pre deployment. We will explain the rationale behind these choices, while reassuring stakeholders that deployments are proportionate, lawful, and subject to equality impact considerations.</p> <p>Local MP’s and elected members will be engaged with to understand the socio-economic considerations need to be made.</p> <p>A standing operating procedure is in place. A common-sense proportionate approach will take place regarding an alert. In circumstances VA may be appropriate.</p>			<p>Pre briefs and debriefs and understanding the impact of deployments is key.</p> <p>This approach creates an opportunity for stakeholders to raise concerns, share local insights, and suggest ways to reduce any unintended impact on different community groups. Their feedback will help shape future deployments, ensuring that our use of LFR remains transparent, fair, and responsive to community needs.</p> <p>Community groups, local authorities and community leaders are being engaged with and are being offered a show and tell demonstration on the 5th of December 2025. There is also a similar presentation on the 28th of November 2025 at a PRAP meeting.</p> <p>As per the LFR policy engagement is a key component of any deployment to understand the impacts on any given community/ locality.</p>

## Stakeholder Engagement Summary

Stakeholder	Why	Date	Feedback	Actions Taken
Merseyside Police Strand Leads	Initial Consultation and Deployment Considerations	17/11/2025	As per SMB 2/12/25	Policy updated, and questions answered captured on policy document.
PRAP	2024 – 2025 - Previous engagement undertaken by Supt Baldwin with Liverpool LA CEO, Local MP Andrea Eagle and Police and Crime Commissioners Office. Letters sent to them with brief LFR explainer. Community Safety Partnership Meetings attended.	28/11/2025 05/12/2025	Feedback from MIAG, PRAP, and community engagement sessions will be formally recorded and used to update LFR policy and SOPs.	Presentation at PRAP Event L8. Series of QA documented and will be used to develop database of Q&A which will benefit engagement and deployments. Captured in the LFR CIA.
MIAG	As above	05/12/2025	Feedback from MIAG, PRAP, and community engagement sessions will be formally recorded and used to update LFR policy and SOPs.	
Community Leaders	As above	05/12/2025	Feedback from MIAG, PRAP, and community engagement sessions will be formally recorded and used to update LFR policy and SOPs.	Meeting held with Community Leaders/stakeholders on 5 <sup>th</sup> December 2025. Details of event captured in LFR CIA.

Staff Associations and Networks	Initial Consultation and Deployment Considerations for Police Staff	17/11/2025	Feedback provided on Policy	Policy agreed Senior Management Board 2 <sup>nd</sup> December 2025
Engagement through “show & tell” sessions with LFR vans with external Partners	To engage Community groups and build positive view of LFR technology	5 <sup>th</sup> December 2025	Presentation given, demonstration of the LFR vans and question and answer session.	All questions and answers captured for a repository to be used in further engagement and understanding of key themes being raised. CIA noted.
Merseyside continue to be a member / attend the NPCC FRT Board.	To engage with other forces deploying LFR, discuss best practise and share learning	On Going		

**3. If you have indicated a potential negative impact that can't be resolved and believe that this can be justified, what is the justification? Have you taken advice when making this decision and if so, from whom?**

**Algorithm Bias**

Every algorithm has an element of bias, however algorithms are regulated and monitored by the National Institute for Science and Technology to ensure that the level of bias remains at an acceptable rate.

The Metropolitan Police Service (the Met) and South Wales Police (SWP) tested Facial Recognition Technology, NEC Neoface (FRT) with the National Physical Laboratory (NPL). The NPL is a world-leading centre of excellence that provides cutting-edge measurement in science, engineering and technology. In large part, because of previous testing by the National Institute of Standards and Technology (NIST) the Met and SWP agreed that their FRT used a high performing algorithm. The aim of the testing was to develop an in-depth understanding of the performance of the algorithms when it was being used in an operational environment. The three policing use cases were:

- Live Facial Recognition (LFR)
- Retrospective Facial Recognition (RFR)
- Operator Initiated Facial Recognition (OIFR)

The NPL test plan was specifically designed to help identify any impact this technology may have on any protected characteristics, in particular race, age and sex.

The NPL report provided an impartial, scientifically underpinned and evidence-based analysis of the performance of the facial recognition algorithm currently used by the Met and SWP. The results afforded a better understanding of the demographic performance of the LFR system. Algorithms can be operated which provide no statistical significance between demographic performances. The research demonstrated:

- that there was no demographic performance variation for RFR.
- that there was no demographic performance variation for OIFR.

The full results are presented in the NPL's commissioned report: **'Facial Recognition Technology in Law Enforcement Equitability Study'**.

**Watchlist Management**

To ensure fairness, proportionality, and compliance with national standards, Merseyside Police will implement a watchlist management process aligned with NPCC governance and guidance from the National LFR Team and College of Policing Authorised Professional Practice (APP).

Watchlists can include individuals wanted by the courts, Merseyside Police, subject to recall or subject to court orders. Each watchlist inclusion will undergo a necessity and proportionality assessment.

Watchlists are compiled using strict criteria to target individuals who pose a significant risk of harm or are subject to legal restrictions and reviewed regularly to maintain accuracy and relevance.

The process will be documented and subject to internal scrutiny and external oversight to prevent misuse or disproportionate targeting. Watchlists will comply with national governance requirements, including:

- Clear inclusion criteria based on threat, harm, and risk, bringing offenders to justice, preventing crime, and protecting the public.
- Regular review and removal of outdated entries.
- Secure handling and deletion of data in accordance with ICO guidance and GDPR.

By adhering to these standards and maintaining rigorous oversight, Merseyside Police aim to uphold public confidence and meet legal and ethical obligations.

### **Data Handling & Privacy**

Data protection is central to the deployment of LFR. Images that do not result in a match will be deleted immediately, ensuring that no unnecessary personal data is retained. Alerts generated by the system will only be kept for operational purposes and will be deleted within 24 hours. CCTV footage captured during deployments will follow existing retention policies, typically 31 days, and will be securely stored. All data handling will comply with GDPR principles and ICO guidance, with regular audits to confirm adherence. This approach ensures transparency and safeguards individual privacy.

This Equality Impact Assessment (EIA) is aligned with the Data Protection Impact Assessment (DPIA) for Live Facial Recognition (LFR). All deployments will comply with GDPR principles and ICO guidance, ensuring that privacy risks identified in the DPIA are addressed alongside equality considerations. Data handling processes, including immediate deletion of non-matching images and secure retention of operational data, will be monitored through joint EIA-DPIA reviews to maintain legal and ethical compliance.

### **Deployment Governance and Transparency**

Every LFR deployment will require senior officer authorisation, supported by a documented necessity and proportionality assessment. To maintain transparency, Merseyside Police will publish deployment locations and dates on its website prior to operations. Clear signage will be displayed at deployment sites, and leaflets will be distributed to inform the public about the use of LFR. Annual reports detailing deployments and outcomes will be shared with independent scrutiny panels and made publicly available. These measures aim to foster trust and demonstrate accountability in the use of this technology.

Roles and responsibilities for LFR operations will be clearly defined. All decision made and actions taken will be documented in Applications, Written Authorisation and deployment logs.

Deployment Location Based Risk Assessment will be conducted prior to each LFR deployment to identify environmental factors that may affect system performance and equality outcomes. This includes assessing lighting conditions, crowd density, weather, and camera positioning. Mitigation strategies will be applied, such as adjusting camera angles, deploying additional lighting, or limiting use in high-density environments where accuracy may be compromised. These assessments will be documented and reviewed as part of the authorisation process and post-deployment evaluation.

Merseyside Police will publish anonymised deployment outcomes on its public website following each operation, ensuring transparency and accountability. These reports will include the number of

alerts, confirmed matches, and any equality impact observations. Annual reports will consolidate this data and be shared with independent scrutiny panels and made publicly available

### **Monitoring and Review**

The Equality Impact Assessment will not be a static document; it will be reviewed following any significant change to policy, technology, or watchlist criteria, after deployments where equality concerns are identified, and at least annually, to ensure that actions remain relevant and effective. An annual public report will summarise LFR usage, equality impacts, and any adjustments made to mitigate risks. Feedback from community engagement sessions will be incorporated into future reviews. This continuous monitoring process ensures that Merseyside Police remain responsive to emerging concerns and evolving best practices.

Each deployment will undergo a formal post-operation review. Findings will be documented and shared with scrutiny panels and incorporated into future policy updates

### **Compliance References**

To reinforce accountability, Merseyside Police will align its LFR deployment with key regulatory and ethical frameworks, including the Equality Act 2010, ICO Opinion on LFR, NPCC national guidance, and findings from the National Physical Laboratory Equitability Study. Research from the Alan Turing Institute and other academic sources will inform ongoing bias mitigation strategies. By grounding our approach in recognised standards and evidence-based practices, we aim to deliver a policing tactic that is both effective and equitable.

#### **4. When will this policy, proposal or project next be reviewed? How will you monitor any impact in the intervening period?**

This equality impact assessment should be reviewed regularly to ensure the actions are continuously monitored throughout the force's exploration and implementation of facial recognition technology. If there is a change of tool/algorithm used in Merseyside, this equality impact assessment should be further reviewed until all considerations are addressed. At a minimum this will be reviewed annually.

All Public Authorities such as Merseyside Police must comply with section 149 of the Equality Act 2010 more commonly known as the General Duty.

The Duty requires Merseyside Police to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.

One of the ways we can demonstrate that we are complying with the General Duty is to document how decisions are reached and resulting activities including monitoring and review arrangements. In Merseyside Police, we evidence this is by completing EIAs.

**5. I am satisfied that all available evidence has been accurately assessed for its potential impact on groups with protected characteristics and socio-economic disadvantage. Mitigation, where appropriate, has been identified and dealt with accordingly.**

<b>Owner:</b>	Sarah Riley/Chris Hilton
<b>Rank / Grade:</b>	Grade G/ Sergeant
<b>Date:</b>	18/11/2025