



Equality Impact Assessment Form (EIA)

Name of Activity to be referred to as “deliverable”	TVP Overt Use of Live Facial Recognition (LFR)
Deliverable lead owner	Detective Chief Superintendent, Head of Crime & Intelligence
Area/Department/LCU	TVP Crime and Intelligence
Person Completing the EIA (Author)	Produced by Legal Consultant. Reviewed by Head of Intelligence, Senior Information Governance Manager and LFR Team Inspector
Date EIA commenced	04/12/2025

1. Purpose

Please tick as appropriate.

Policy ☒ Procedure ☒ Strategy ☐ Change Programme ☐ Other ☐ (specify below)

2. Describe the aims and benefits of this deliverable.

In the pursuance of its policing objectives, TVP may need to locate individuals. LFR (live facial recognition) is a policing tool, which harnesses digital technology, particularly overt live facial recognition technology, in order to significantly enhance the ability of TVP in locating specific individuals or defined groups of persons, whose images are included in a watchlist.

Deployment Overview

Before any deployment of equipment, a watchlist is created. The watchlist is bespoke for each deployment and the rationale for the make-up of the watchlist is intelligence-led, justified, proportionate and necessary. The criteria for the construction of watchlists for use with LFR must be approved by the Authorising Officer and be specific to an operation.

TVP's use of LFR will be to locate persons that have been added to a watchlist for the following reasons:

- (a) wanted by way of an outstanding warrant for their arrest issued by a court or are sought for recall to prison.
- (b) about whom there are reasonable grounds for suspecting that they have committed a criminal offence.
- (c) who are subject to bail conditions, court order or other restrictions that would be breached if they were at the location at the time of the deployment.
- (d) who are currently subject to legally enforceable restrictions or conditions, in order to monitor compliance with those restrictions or conditions, where compliance can be monitored through the individual's presence, conduct or both, within the deployment location. This includes MAPPA subjects (including registered sex offenders) and persons subject to police or court-imposed conditions, such as bail conditions or court orders, where the restrictions or conditions relate to relevant offences.
- (e) about whom there is credible intelligence, a known history of relevant and recent offending, or both, that gives rise to reasonable grounds for suspecting that they are likely to commit a serious or hotspot crime, pose a risk to public safety,

or cause other harm, including self-harm.

(f) who are designated as a Missing Person.

(g) about whom there is credible intelligence that gives rise to reasonable grounds for suspecting that they are at real risk of serious harm.

(h) about whom there is credible intelligence that gives rise to reasonable grounds for suspecting that they are likely to be a victim of, or witness to, a serious crime.

In respect of all persons sought, both the seriousness of the suspected offence or other harm, and its prevalence and local impact will be considered.

The deployment of LFR has to be to a specified location, the selection of which is intelligence led. Consideration will be given, in accordance with the policy documentation prepared by TVP to govern the deployment of LFR (the “**LFR Documentation**”), to the location and the impact on local communications and organisation of the deployment as well as to the impact on individuals seeking to avoid the LFR deployment.

CCTV footage obtained as part of the LFR deployment may identify a person’s race, religion, sex and/or their disability status. However, the footage is only used by LFR to obtain biometric data to compare against the watch list and is deleted after 31 days unless part of it is required in relation to an investigation of a complaint or retained as evidence of a criminal investigation and/or prosecution.

Following the National Physical Laboratory Equitability Study, LFR is deemed to be equitable, with no significant statistical difference across all demographics, when used in accordance with the configuration permitted by the LFR Documentation. TVP has then reflected the findings in the TVP LFR Documents, to inform its operational practice. Specifically, the NPL research and deployments by South Wales Police showed no false negatives where a threshold setting of 0.64 was utilised, and as such TVP have decided to replicate this threshold setting in its deployments.

No action will be taken automatically as a result of a potential match flagged by the LFR system. Rather, officers are required to exercise their own independent judgement before taking a decision even to engage with an individual.

Aims and Benefits of LFR

TVP considers, based on the experience of other police forces, that LFR is a highly effective and valuable tool that supports the force protect its communities. As of November 2025, thirteen police forces have used or are using LFR. The Home Office published a consultation on 4 December 2025 which identified a number of benefits of the use of LFR¹:

- An LFR alert helped the Metropolitan Police locate a man wanted for two outstanding rapes and an offence of indecent assault. The indecent assault was committed in 2017.
- Deployments of LFR in London, from January 2024 to September 2025, led to over 1,300 arrests of individuals wanted for a variety of serious crimes, such as rape, domestic abuse, aggravated burglary, grievous bodily harm, robbery, drug supply, animal cruelty, aggravated harassment, cruelty to children and criminal damage.
- The deployments in London also led to other positive outcomes, such as allowing the police to ensure that registered sex offenders were complying with court-imposed conditions. This led to over 100 arrests during the same period.
- South Wales Police used LFR to help locate and subsequently arrest individuals wanted for a variety of serious crimes, such as grievous bodily harm with intent, robbery, intentional strangulation, actual bodily harm, breach of sex offender notification conditions, domestic violence-related malicious communications, breach of a court order relating to a swelling burglary, vehicle interference and drugs.
- A high risk missing 14-year old girl with significant concerns relating to child sexual exploitation and criminal exploitation was identified following South Wales Police's use of LFR.
- Suffolk Police's use of LFR led to four people being located and arrested for failing to appear before court and a fifth person for theft.

The Purpose of the Equality Impact Assessment

The purpose of this Equality Impact Assessment (“**EIA**”) is to assess this proposal for equality impact for service users effected by the proposal's implementation. Conducting this assessment aims to identify disadvantages suffered by any individual and/or group safeguarded by a protected characteristic, and by those who are not.

The aim is to mitigate any identified disadvantage by eliminating the impact, reducing the impact or excepting the impact. If elimination and/or reduction is not possible, TVP are required to implement a positive action strategy or provide a

¹ [Police use of facial recognition: factsheet - GOV.UK](#)

justification rationale for not doing so.

The purpose of conducting EIAs is to meet the legal requirements set out in the s.149 of the Equality Act 2010 (the “**Act**”) (the “Public Sector Equality Duty”) or (“**PSED**”), and specifically, in relation to the three aims set out therein:

- To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- To advance equality of opportunity between people who share a protected characteristic and those who do not;
- Foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people;
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

This EIA concerns the use of LFR by TVP in principle, in accordance with the TVP Policy Document. However, TVP recognises that the PSED is an ongoing duty. Accordingly, the PSED will be considered in the context of individual deployments. To the extent that a deployment raises specific equality considerations, these must be considered by the Authorising Officer.

3. Consultation – (include name of business/organisation and relevance to this deliverable).

Consultation has been undertaken, and is ongoing, in respect of TVP’s decision to deploy LFR as a policing tactic in appropriate circumstances.

The TVP “Think Tank”, established by TVP’s Assistant Chief Constable - Legitimacy and Public Value, but independently chaired, has been consulted on several occasions, and been given an opportunity to ask questions and challenge thinking. The group is made up of both internal and external stakeholders from a variety of backgrounds and with a variety of specialist interests and experiences. The objectives of the “think tank” are:

- To consider, provide advice and guidance on and challenge the interpretation of legitimacy and implications of external statutory, regulatory requirements or policy guidance relating to legitimacy matters for both policing and non-policing agencies.
- To review and provide advice on cases, circumstances and activities which have significant or novel and/or wider-ranging ethical considerations and which fall within any of the legitimacy principles.
- To oversee the development of a legitimacy framework/strategy to enable corporate and institutional matters to be consistently, fairly and proportionately assessed, and receive assurance on the effectiveness of its strategy.
- Highlight any significant risk to or opportunity and share good practice and good news stories.
- Share knowledge and provide guidance on how legitimacy impacts on partnerships and Organisational Development.
- Advise on contemporary policing issues and matters of emerging interest to policing.

Separately, the TVP “Chairs of Independent Advisory Groups” has been consulted. This group is made up of the chairs of the various local IAGs from across the different areas of TVP. Again, this group has been briefed and given an opportunity to ask questions and challenge, but also invited to cascade information about TVP’s plans to deploy LFR technology in communities to local IAGs, who, in turn, are invited to engage with tactical and strategic LFR leads accordingly.

4. Other sources of information (include HMICFRS reports, performance data - quantitative and qualitative data, academic research, recommendations etc).

ICO opinion on the use of live facial recognition technology by law enforcement in public places

<https://ico.org.uk/media/about-the-ico/documents/2616184/live-frt-law-enforcement-opinion-20191031.pdf>

This report covers a number of points including:

- The public expect – indeed have a right to demand — the highest standards of compliance by the police and other law enforcement authorities when processing sensitive data on a large scale and which occurs when using LFR in public areas. The Commissioner views such high standards, reflected in this Opinion, as critical to maintaining public confidence in the technology and what it is seeking to achieve.

- In the Commissioner's view, the case for effectiveness should not be based on the ratio of matches compared to false matches, although that may be an indicator of effectiveness. Nor should effectiveness be based simply on the number of arrests enabled by LFR. Effectiveness should also be assessed by reference to demonstrable benefit to the public. A possible example is where LFR results in the location and conviction of a serious offender leading to a reduction in that individual's ability to commit serious crime.

From the perspective of transparency, the Commissioner believes that law enforcement agencies should ensure that sufficient information is made available to the public so that the public, and directly affected individuals, are able to understand how the law enforcement agency's measures of effectiveness inform the evolution and duration of pilot phases, as well as operational deployments.

- In order to mitigate the risk of bias within the technology against gender or ethnic groups, agencies considering deployment of LFR should complete an EIA with consideration to the Act, and regularly review this against legal developments (as the High Court noted in *Bridges v SWP*) and changes made to the College of Policing APP and documents published by the SCC and other publicly available documents/studies addressing the use of LFR.

Bridges v Chief Constable of South Wales Police

<https://www.judiciary.uk/wp-content/uploads/2019/09/bridges-swp-judgment-Final03-09-19-1.pdf>

<https://www.judiciary.uk/wp-content/uploads/2020/08/R-Bridges-v-CC-South-Wales-ors-Judgment.pdf>

The courts considered the use of South Wales Police's (SWP) trials of Automated Facial Recognition technology in *R* (on the application of Edward Bridges) v The Chief Constable of South Wales Police [2019] EWHC 2341 (Admin).

The Court of Appeal recognised the existence of a legal framework for forces to use facial recognition but found that SWP left too much to officer discretion when considering who could be on a watchlist and where SWP could deploy their LFR system. This meant the deployments in question were not in accordance with the law for the purposes of Article 8. For SWP, this could be remedied by providing sufficient detail in local force policy in a way that was clearly understandable and objective to answer (i) who can be on a watchlist and (ii) where can LFR be deployed. The Court found that SWP did not have a sufficient Data Protection Impact Assessment – the level of discretion given to officers meant that the use of LFR was not in accordance with the law. SWP also failed

to consider the rights of those passing the LFR system (collateral intrusion). Consequently, the Data Protection Act 2018 was also breached. The Court found that SWP did not pay due regard to the PSED. They had not updated their equality impact assessment from its initial issue and SWP had not taken measures to assure themselves as to whether their system had a gender or race bias in it prior to its use. Forces will need to reasonable steps to satisfy itself, either directly or by way of independent verification, that the algorithm does not have an unacceptable bias.

College of Policing APP- Live Facial Recognition.

College of Policing National Approved Professional Practice covering guidance for the use of overt deployment of LFR to locate a person on a Watchlist.

Surveillance Camera Commissioner “Facing the camera” document. November 2020

The SCC (now the Biometrics and Surveillance Camera Commissioner) is the independent regulator of the overt use and public operation of surveillance camera systems by the police in England and Wales. This includes systems incorporating LFR. The former SCC published a document outlining what is a good practice and guidance for the police use of overt surveillance camera systems incorporating facial recognition technology to locate persons on a Watchlist.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/940386/6.7024_SCC_Facial_recognition_report_v3_WEB.pdf

5. Which of the following characteristics do you think the deliverable will impact (actual or anticipated)? Consider the aims of the Public Service Equality Duty, 2010 including the anticipatory duty.

Protected Characteristics	Positive	Negative	Neutral	Impact - Include impact of deliverable, including sources of information and any actions or changes considered: - Internal impact (for example, staff or volunteers). - External impact (for example, victims, witnesses and
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				suspects, public and partners) If a negative impact has been identified, please provide further details stating what actions need to be undertaken. How any negative impact can be justified for the deliverable? • Include Action owner
Age	x	x		See below.
Disability including neurodiversity and mental health	x	x		See below.
Gender Reassignment	x	x		See below.
Marriage and Civil Partnership			X	
Pregnancy and Maternity			X	
Race/Ethnicity	x	x		See below.
Religion or Belief	X	x		See below.
Gender	x	X		See below.
Sexual Orientation			X	
Other Equality issue not listed/protected above for example impact – homeless people/sex worker etc				For any non-English speakers, transparency measures such as the publication of TVP's LFR Documentation and/or prior notification of LFR deployments on TVP's website and social media channels, as well as the signage at the perimeter of the LFR zone of recognition, may be ineffective. Given that transparency measures will be available online in documented form, non-English speakers may be able to utilize services such as Google translate to translate documents into their nature or preferred language.

Age

Details of positive and/or adverse impact or other issue

Image date. LFR alerts are based on the mapping of key facial indicators when comparing an inputted face image to an individual's face entering or passing through a Zone of Recognition. Therefore, the functionality, accuracy and performance of LFR may be less effective if changes to facial appearance have occurred between the time the watchlist was taken and the time the subject enters or passes through a Zone of Recognition.

Facial images uploaded will be sourced primarily from existing TVP records (usually custody images) or, where necessary and authorised in accordance with the LFR Documentation, from other sources, such as from family and friends of persons reported as missing. The reference image database, consequently, may have images of subjects that were taken a number of years ago, albeit that all images must meet minimum quality standards and the proposed inclusion of non-police sourced images is the subject of specific consideration.

Younger children. Studies have shown that younger children, up to the age of 13, are both harder to correctly recognise (lower True Positive Identification Rate) but also harder to distinguish between (higher False Alert Rate).² A higher False Alert Rate could lead to more false alerts being generated against young children if there is an image of a young person in a watchlist.

The European Union's Agency for Fundamental Rights, 'Facial Recognition Technology Fundamental Rights Considerations in the Context of Law Enforcement Report 2019' highlights that as a child grows and time passes, the accuracy of a biometric match can diminish. The risk of a failure to match increases when facial images recorded at a young age are compared more than five years after they were collected. The report further indicates that the accuracy of facial recognition technology is in general significantly lower for children younger than 13 years old, associated with rapid growth and a change in facial appearance.

The accuracy and efficacy of LFR may also be affected simply by the positioning of LFR CCTV cameras and the density of crowds, which may make it harder for younger people, who are likely to be shorter than adults, to be picked up on camera.

² [NIST.IR.8009.pdf](#)

Children approaching the LFR zone of recognition may be less likely to effectively understand, and therefore engage with, transparency measures.

Vulnerable children. There is also a positive impact on the early location of vulnerable children. LFR has the propensity to support safeguarding measures to reduce a child's exposure to child sexual exploitation, abuse and/or neglect.

Watchlist. The age of criminal responsibility in the UK is 10 years old. Image capture via custody imaging, on which LFR technology is reliant, is dependent on the age, date and time at which the custody image was taken. The age profile of criminality is not consistent across age ranges. In particular, from its own analysis, TVP is mindful of the profile of persons recorded as suspects in crimes committed in the force area, where there is a skew toward those over 18, and as such the profile of those on the watchlist can be expected to reflect this.

Older individuals. Research by Age UK suggests that 1 in 3 people³ over the age of 65 lack the basic skills to use the internet successfully, and therefore transparency measures such as the publication of TVP LFR Documentation and/or prior notification of LFR deployments on the TVP website and social media channels may not reach these groups. These groups also may face greater challenges in seeking to avoid LFR deployments by taking alternative routes.

Timing/location. A significantly higher proportion of NHS outpatient appointments are taken by individuals in 60-79 age group⁴, and therefore these individuals may be more significantly affected should an LFR deployment be located in the vicinity of a health facility which requires them to enter the LFR zone of recognition, and set at a time when they are more likely to be attending that facility.

Mitigating action or activity

Performance. TVP will deploy LFR with a configured threshold of 0.64 demonstrating a low tolerance for false matches at a level which also minimises the risk of bias or discrimination. The accepted tolerance for false matches is a False Alert Rate of 1:1000 which seeks to balance the countervailing interests in a proportionate way but in practice it is noted that at the configuration threshold of 0.64, the FPIR/False Alert Rate performed significantly better both in scientific testing by the National Physical Laboratory and having regard to the operational experience of South Wales Police.

³ [More than 1 in 3 over 65s \(4.7 million\) lack the basic skills to use the internet successfully](#)

⁴ [Hospital Outpatient Activity 2024-25 - NHS England Digital](#)

The LFR Operator is charged with actively monitoring the LFR system's performance during a deployment; the Silver Commander is also empowered to halt any deployment.

Image Quality. Any images contained in a watchlist are required by TVP LFR Documentation and to whenever possible meet minimum quality thresholds. Watchlists will be compiled as close to the deployment as possible and no earlier than 24 hours in advance, with the aim of ensuring that the most accurate and up to date images of persons being added are uploaded.

Watchlist. Particular safeguards are in place in relation to the watchlist of those under 18; specific authorisation from the Authorising Officer is required for watchlist inclusion of persons under the age of 13 and persons under the age of 18. There will also be a manual review of the watchlist images prior to uploading, with particular attention being paid to individuals under the age of 13 and 18. The review will include consideration of their continued inclusion and removal where it is not believed to be necessary and proportionate to include them and/or in their best interests (noting that the potential involvement of a child in criminality may require police intervention to prevent further involvement in an escalation of that criminality and for safeguarding purposes). Where the manual review of the individuals/images results in the continued inclusion in the watch list the pre-deployment briefing of LFR Operators and Engagement Officers will make them aware, enabling them to pay due regard when reviewing and determining the veracity of matches flagged by the LFR system.

Where an individual is identified as meeting the authorised criteria for inclusion on a specific watchlist, and TVP holds multiple custody images of the individual, the most recent custody image will be selected for inclusion on the watchlist. This measure will assist in minimising the time period between original image capture and LFR deployment, within which any changes in an individual's facial structure and appearance may occur.

Transparency. It is expected that the advance publication of proposed deployments via TVP's website and social media platforms will lead to publicity in more traditional forms of media such as local news and radio, which may be more likely to reach older people. Moreover, the increasing use of the technology by police forces has been widely reported in the media which has raised public awareness. All LFR deployments are required to be overt and will be identified through signage at the perimeter of the LFR deployment zone, which will also be staffed by police officers and staff to enable individuals to be aware of and understand the fact and nature of the LFR deployment. This will enable individuals to either avoid the LFR deployment by adopting an alternative route or, where individuals are unwilling or potentially unable to take alternative routes, to take measures to evade the cameras while traversing the LFR zone or recognition.

Children over the age of 13 are likely to be users of social media, and therefore can be informed of the deployment in that way. Younger children may not be aware of those notices or to be equipped to engage with signage and other transparency measures at LFR deployment locations. While younger children are likely to be accompanied by their parents, children approaching or around the age of 13 may not. However, even if those children do not have access to social media, or not with older children who have access to social media, as explained above, the images of younger children may not be captured, due to the positioning of the cameras.

Officer engagement: LFR is a tool that assists police officers locate persons of interest. An LFR match does not qualify as formal identification and LFR software does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing through the Zone of Recognition may be of interest to them, due to their inclusion on the watchlist. Officers then consider the alert using their experience and training, before the Engagement Officer makes any decision to engage with a person. This includes consideration about whether age is a factor in generating an alert. Even where voluntary engagement occurs, this only leads to further actions (for example arrest) where an officer has lawful grounds justifying such action, with the latter being determined by way of discretionary assessment by the officer (as opposed to an automatic consequence of the LFR identification).

Post-Deployment. The use of LFR should be subject to debrief and review. This will help ensure that future deployments reflect learning identified from each deployment, and that the use of LFR remains an effective and proportionate policing tool. The outcome of LFR deployments will be subject to evaluation, which in turn will feed into oversight and scrutiny processes. This process should examine false alerts and determine if there is a trend or overriding cause.

Sex

Details of positive and/or adverse impact or other issue

Performance. There is a risk of differential performance on facial recognition algorithms with respect to demographic differentials. TVP is alive to the risk that a facial recognition algorithm could perform differently across sexes.

Changing appearance. Social observations indicate women change their appearance more frequently and more significantly than men which may impact the performance of LFR as source images may become out-of-date more readily. Similarly, reports suggest facial contouring using cosmetic make-up application may adversely impact the efficacy of LFR. These factors may result in fewer matches for women.

Watchlist: From its own data and gov.uk analysis, TVP is mindful of the profile of crime committed in its region, where there is a significant skew towards male offenders. The profile of persons on the watchlist can be expected to reflect this.

Mitigating action or activity

Performance. TVP will deploy LFR with a configured threshold of 0.64 demonstrating a low tolerance for false matches at a level which also minimises or extinguishes the risk of bias or discrimination. The accepted tolerance for false matches, is a False Alert Rate of 1:1000 which seeks to balance the countervailing interests in a proportionate way but in practice it is noted that at the configuration Threshold of 0.64, the FPIR/False Alert Rate performed significantly better both in scientific testing by the National Physical Laboratory and having regard to the operational experience of South Wales Police.

The LFR Operator is charged with actively monitoring the LFR system's performance during a deployment; the Silver Commander is also empowered to halt any deployment.

Image Quality. Any images contained in a watchlist are required by TVP LFR Documentation to, whenever possible, meet minimum quality thresholds, as documented in the TVP LFR Policy. Watchlists will be compiled as close to the deployment as possible and no earlier than 24 hours in advance, with the aim of ensuring that the most accurate and up to date images of persons being added are uploaded.

Should a person's face/image have changed between their image being taken/provided and an LFR deployment, it would ultimately mean that the LFR software would be less likely to highlight a match between the image taken during deployment and that on the watchlist. Where an individual is identified as meeting the authorised criteria for inclusion on a specific watchlist, and TVP holds multiple custody images of the individual, the most recent custody image will be selected for inclusion on the watchlist. This measure will assist in minimising the time period between original image capture and LFR deployment, within which any changes in an individual's facial structure and appearance may occur. Should a match be highlighted, this is checked by the LFR Operator/Engagement Officer for accuracy. Beyond this, there are no other reasonable steps that can be undertaken to address this risk (beyond being conscious of the possibility that a person's appearance may have changed; in particular young persons).

Officer engagement: LFR is a tool that can assist police officers locate persons of interest. A LFR match does not qualify as formal identification and LFR software does not make decisions that result in any person being spoken to. It provides a guide to officers

about which people passing through the Zone of Recognition may be of interest to them. Officers then consider the alert using their experience and training, before the Engagement Officer makes any decision to engage with a person. This includes consideration about whether sex is a factor in generating an alert. Even where voluntary engagement occurs, this only leads to further actions (for example arrest) where an officer has lawful grounds justifying such action, with the latter being determined by way of discretionary assessment by the officer (as opposed to an automatic consequence of the LFR identification).

Post-Deployment. The use of LFR should be subject to debrief and review. This will help ensure that future deployments reflect learning identified from each deployment, and that the use of LFR remains an effective and proportionate policing tool. The outcome of LFR deployments will be subject to evaluation, which in turn will feed into oversight and scrutiny processes. This process should examine false alerts and determine if there is a trend or overriding cause.

Sexual Orientation

Details of positive and/or adverse impact or other issue

There is no anticipated differential impact based on sexual orientation.

Gender Reassignment

Details of positive and/or adverse impact or other issue

Image quality. LFR alerts are based on the mapping of key facial indicators when comparing an inputted face image to an individual's face entering or passing through a Zone of Recognition. Therefore, the functionality, accuracy, and performance of LFR may be less effective if changes to facial appearance have occurred between the time the reference image database was taken, and a comparison is made. This may impact persons who are transitioning from one legal gender to another if gender presentation differs from the time the comparator image was taken. It may also impact on transgender, non-binary and gender-fluid people who adopt to flex between gender presentations.

Reports suggest that facial contouring through the use of cosmetic make-up application may impact on the LFR system's performance.

Mitigating action or activity

Performance. TVP will deploy LFR with a configured threshold of 0.64 demonstrating a low tolerance for false matches at a level which also minimises or extinguishes the risk of bias or discrimination. The accepted tolerance for false matches, is a False Alert Rate of 1:1000 which seeks to balance the countervailing interests in a proportionate way but in practice it is noted that at the configuration threshold of 0.64, the FPIR/False Alert Rate performed significantly better both in scientific testing by the National Physical Laboratory and having regard to the operational experience of South Wales Police.

The LFR Operator is charged with actively monitoring the LFR system's performance during a deployment; the Silver Commander is also empowered to halt any deployment.

Image Quality. Any images contained in a watchlist are required by TVP LFR Documentation to whenever possible meet minimum quality thresholds. Watchlists will be compiled as close to the deployment as possible and no earlier than 24 hours in advance, with the aim of ensuring that the most accurate and up to date images of persons being added are uploaded.

Should a person's face/image have changed between their image being taken/provided and an LFR deployment, it would ultimately mean that the LFR software would be less likely to highlight a match between the image taken during deployment and that on the watchlist. Where an individual is identified as meeting the authorised criteria for inclusion on a specific watchlist, and TVP holds multiple custody images of the individual, the most recent custody image will be selected for inclusion on the watchlist. This measure will assist in minimising the time period between original image capture and LFR deployment, within which any changes in an individual's facial structure and appearance may occur. Should a match be highlighted, this is checked by the LFR Operator/Engagement Officer for accuracy. Beyond this, there are no other reasonable steps that can be undertaken to address this risk (beyond being conscious of the possibility that a person's appearance may have changed; in particular young persons).

Officer engagement: LFR is a tool that assists police officers locate wanted people. A LFR match does not qualify as formal identification and LFR software does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing through the Zone of Recognition may be of interest to them. Officers then consider the alert using their experience and training, before the Engagement Officer makes any decision to engage with a person. This includes consideration about whether gender reassignment is a factor in generating an alert. Even where voluntary engagement occurs, this only leads to

further actions (for example arrest) where an officer has lawful grounds justifying such action, with the latter being determined by way of discretionary assessment by the officer (as opposed to an automatic consequence of the LFR identification).

Post-Deployment. The use of LFR should be subject to debrief and review. This will help ensure that future deployments reflect learning identified from each deployment, and that the use of LFR remains an effective and proportionate policing tool. The outcome of LFR deployments will be subject to evaluation, which in turn will feed into oversight and scrutiny processes. This process should examine false alerts and determine if there is a trend or overriding cause.

Pregnancy/Maternity

Details of positive and/or adverse impact or other issue

There is no anticipated differential impact based on pregnancy/maternity status.

Marriage and Civil Partnership

Details of positive and/or adverse impact or other issue

There is no anticipated differential impact based on marital or civil partnership status.

Religion or Belief

Details of positive and/or adverse impact or other issue

Performance. The functionality, accuracy and performance of LFR may be less effective if the face is obstructed. Items adorned on the head and/or face are not limited to a particular religion or belief (and can be a style decision, or a decision by necessity, by any member of the community). Nevertheless, the wearing of religious headwear/coverings and/or facial hair may have a bearing on LFR effectiveness.

Cultural sensitivities. In addition, certain cultures or sexes within a religion, i.e. Amish, refuse or are reluctant to allow themselves to be photographed. A lack of awareness around LFR image capture under these circumstances could lead to discontent and/or community tension.

Timing/Location. The timing and location of an LFR deployment could adversely impact on individuals associated with religious or cultural organisations, by either discouraging them from attending or resulting in them feeling compelled to enter the LFR zone of recognition.

Mitigating action or activity

Performance. TVP will deploy LFR with a configured threshold of 0.64 demonstrating a low tolerance for false matches at a level which also minimises or extinguishes the risk of bias or discrimination. The accepted tolerance for false matches, is a False Alert Rate of 1:1000 which seeks to balance the countervailing interests in a proportionate way but in practice it is noted that at the configuration Threshold of 0.64, the FPIR/False Alert Rate performed significantly better both in scientific testing by the National Physical Laboratory and having regard to the operational experience of South Wales Police.

The LFR Operator is charged with actively monitoring the LFR system's performance during a deployment; the Silver Commander is empowered to halt any deployment.

Cultural sensitivities. Pre-deployment transparency, and community dialogue, can increase the likelihood that individuals have the opportunity not to participate. This analysis will be informed by the Community Impact Assessment, which can be expected to assess the identified risk of community tension. Where available, as part of the Community Impact Assessment conducted in respect of each deployment, a police Community and Diversity Officer with specialist knowledge around religion and cultural matters will be consulted as part of the application process

Timing/Location. The timing and location of an LFR deployment and the possibility of an impact on religious or cultural organisations will be considered as part of the LFR planning process, to ensure that locations are identified which do not adversely and disproportionately impact individuals with a protected characteristic.

Image Quality. Any images contained in a watchlist are required by TVP LFR Documentation and to, whenever possible, meet minimum quality thresholds. Watchlists will be compiled as close to the deployment as possible and no earlier than 24 hours in

advance, with the aim of ensuring that the most accurate and up to date images of persons being added are uploaded.

Should a person be wearing some form headwear or covering, it could mean that the LFR software would be less likely to highlight a match between the image taken during deployment and that on the watchlist. There are no actions that can be reasonably undertaken to stop this from happening; police have no power to require individuals to remove headwear or coverings while traversing the LFR zone of recognition absent some other justification.

Officer engagement: LFR is a tool that assists police officers locate wanted people. A LFR match does not qualify as formal identification and LFR software does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing through the Zone of Recognition may be of interest to them. Officers then consider the alert using their experience and training, before the Engagement Officer makes any decision to engage with a person. This includes consideration about whether religion or belief, including the use of headwear or coverings, are factors in generating an alert. Even where voluntary engagement occurs, this only leads to further actions (for example arrest) where an officer has lawful grounds justifying such action, with the latter being determined by way of discretionary assessment by the officer (as opposed to an automatic consequence of the LFR identification).

Post-Deployment. The use of LFR should be subject to debrief and review. This will help ensure that future deployments reflect learning identified from each deployment, and that the use of LFR remains an effective and proportionate policing tool. The outcome of LFR deployments will be subject to evaluation, which in turn will feed into oversight and scrutiny processes. This process should examine false alerts and determine if there is a trend or overriding cause.

Race and Ethnicity

Details of positive and/or adverse impact or other issue

Community tension. The jurisdiction of the TVP is a multi-cultural area. It is therefore important to ensure that the use of LFR technology does not and is not perceived to unfairly impact or cause division between persons of different race/ethnicity.

Image quality. LFR is based on mapping of key facial indicators when comparing a reference image database image for an individual. The efficacy of LFR is dependent on the ability of the algorithm to determine key facial features within an image. This can be impacted environmental factors such as ambient light and shadows. This may also be impacted by the depth of skin pigmentation.

Consideration has been given to the potential for ethnicity biases in the use of LFR algorithms referred to in the Court of Appeal in Bridges v SWP [2020] EWCA Civ 1058.

Timing/Location. The timing and location of an LFR deployment could adversely impact on individuals of specific ethnicities who are more likely to attend religious or cultural organisations, by either discouraging them from attending or resulting in them feeling compelled to enter the LFR zone of recognition where proximate to such an organisation.

Watchlist: TVP is mindful of the profile of crime committed in its region, in which ethnic minority groups make up a greater proportion of arrests than of the general population. The profile of persons on the watchlist can be expected to reflect this wider trend.

Mitigating action or activity

Performance. TVP will deploy LFR with a configured threshold of 0.64 demonstrating a low tolerance for false matches at a level which also minimises or extinguishes the risk of bias or discrimination. The accepted tolerance for false matches, is a False Alert Rate of 1:1000 which seeks to balance the countervailing interests in a proportionate way but in practice it is noted that at the configuration Threshold of 0.64, the FPIR/False Alert Rate performed significantly better both in scientific testing by the National Physical Laboratory and having regard to the operational experience of South Wales Police.

Officer engagement: LFR is a tool that assists police officers locate wanted people. A LFR match does not qualify as formal identification and LFR software does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing through the Zone of Recognition may be of interest to them. Officers then consider the alert using their experience and training, before the Engagement Officer makes any decision to engage with a person. This includes consideration about whether race and/or ethnicity are factors in generating an alert. Even where voluntary engagement occurs, this only leads to further actions (for example arrest) where an officer has lawful grounds justifying such action, with the latter being determined by way of discretionary assessment by the officer (as opposed to an automatic consequence of the LFR identification).

Community Tension. Pre-deployment transparency, and community dialogue, can increase the awareness and understanding of the way in which TVP uses LFR. This analysis will be informed by the Community Impact Assessment, which can be expected to assess the identified risk of community tension. Where available as part of the Community Impact Assessment conducted, in respect of each deployment, a police Community and Diversity Officer with specialist knowledge around religion and cultural matters will be consulted

as part of the application process

Post-Deployment. The use of LFR should be subject to debrief and review. This will help ensure that future deployments reflect learning identified from each deployment, and that the use of LFR remains an effective and proportionate policing tool. The outcome of LFR deployments will be subject to evaluation, which in turn will feed into oversight and scrutiny processes. This process should examine false alerts and determine if there is a trend or overriding cause.

Timing/Location. The timing and location of an LFR deployment and the possibility of an impact on those attending religious or cultural organisations, which may be more relevant to those of certain ethnicities, will be considered as part of the LFR planning process, to ensure that locations are identified which do not adversely and disproportionately impact individuals with a protected characteristic.

Disability

Details of positive and/or adverse impact or other issue

Image Quality. 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 which would result in a significant change to their facial features. Genetic conditions such as neurofibromatosis also cause progressive facial change. Consequently, the images that TVP hold may not accurately reflect their present facial appearance. The functionality, accuracy and performance of LFR may be less effective if changes to facial appearance have occurred between the time the watchlist image was taken, and the time the subject enters the zone of recognition.

Camera Location. The accuracy and efficacy of LFR can also be affected simply by the position of LFR CCTV cameras and the density of crowds, which may make it harder for disabled people, particularly individuals in wheelchairs or scooters, or who are shorter, who may not be picked up as well or at all on camera.

Timing/location. It is likely that those with disabilities will be required to attend medical appointments more frequently. Therefore, should an LFR deployment be located in the vicinity of a health facility, and set at a time when they are likely to be attending that facility, individuals with disabilities are more likely to enter the LFR zone of recognition. The TVP LFR Policy states that the selection of

a location for deployment will require the consideration of many countervailing factors including any nearby locations with local sensitivities such as medical treatment facilities.

Transparency. Transparency measures such as the publication of TVP LFR Documentation and/or prior notification of LFR deployments on the TVP website and social media channels may not as readily reach individuals who are disabled. For example, informing people who are partially sighted or visually impaired of the use of LFR through overt means will be more difficult, because they will be unable to view the LFR signage. Individuals with disabilities also may face greater challenges in seeking to avoid LFR deployments by taking alternative routes.

Mitigating action or activity

Watchlist: TVP provides that in the creation of the watchlist for each Deployment, where source data allows, TVP must specifically identify and make the LFR Team specifically aware that the Watchlist contains persons who are believed or suspected to have a disability that may impact the potential matching accuracy of the LFR system.

Image Quality: Should a person's face have changed, LFR software will be less likely to highlight a match between the image taken during deployment and that on the watchlist. Where an individual is identified as meeting the authorised criteria for inclusion on a specific watchlist, and TVP holds multiple custody images of the individual, the most recent custody image will be selected for inclusion on the watchlist. This measure will assist in minimising the time period between original image capture and LFR deployment, within which any changes in an individual's facial structure and appearance may occur. If a match is highlighted, this will be checked by the LFR Operator and Engagement Officer before additional activity is considered.

Officer Engagement: LFR is a tool that assists police officers locate wanted people. A LFR match does not qualify as formal identification and LFR software does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing through the Zone of Recognition may be of interest to them. Officers then consider the alert using their experience and training, before the Engagement Officer makes any decision to engage with a person. This includes consideration about disability as in generating an alert. Even where voluntary engagement occurs, this only leads to further actions (for example arrest) where an officer has lawful grounds justifying such action, with the latter being determined by way of discretionary assessment by the officer (as opposed to an automatic consequence of the LFR identification).

Post-Deployment. The use of LFR should be subject to debrief and review. This will help ensure that future deployments reflect

learning identified from each deployment, and that the use of LFR remains an effective and proportionate policing tool. The outcome of LFR deployments will be subject to evaluation, which in turn will feed into oversight and scrutiny processes. This process should examine false alerts and determine if there is a trend or overriding cause.

Transparency. It is expected that the advance publication of proposed deployments via TVP's website and social media platforms will lead to publicity in more traditional forms of media such as local news and radio, which may be more likely to reach individuals with disabilities. All LFR deployments are required to be overt and will be identified through signage at the perimeter of the LFR deployment zone, which will also be staffed by police officers and staff to enable individuals to be aware of and understand the fact and nature of the LFR deployment. This will enable individuals to either avoid the LFR deployment by adopting an alternative route or, where individuals are unwilling or potentially unable to take alternative routes, to take measures to evade the cameras while traversing the LFR zone or recognition.

6. Conclusion		
The final stage is to determine what should happen with the deliverable		
A) Proceed – No impact identified.	Thorough Assessment completed and no actual or potential impact identified	
B) Proceed – Impact identified. Mitigation in place	Assessment has identified discrimination that can be resolved by taking agreed steps.	x
C) Proceed – Impact identified. Mitigation not available	Assessment has identified actual or potential discrimination that cannot be negated. Discrimination is lawful and can be objectively justified.	x
D) Stop – Impact identified. Mitigation not available	i) Assessment has identified actual or potential discrimination that cannot be resolved and cannot be justified. ii) Identified discrimination is unlawful.	

7. Sign Off

Individuals (author & lead) completing the EIA must ensure that all stages of the sign off and authorisation are completed.			
EIA author completing	Legal Consultant Reviewers: Head of Intelligence / Senior Information Governance Manager / LFR Team Inspector (JoU)	Date	04/12/2025 12/12/2025
EIA Lead owner	Detective Chief Superintendent, Head of Crime & Intelligence	Date	15/12/2025
Chief Officer/Senior Lead (as appropriate)	Detective Chief Superintendent, Head of Crime & Intelligence	Date	15/12/2025

8. Deliverable lead agreement			
EIA Lead owner	Detective Chief Superintendent Craig Kirby, Head of Crime & Intelligence		Date15/12/2025
Is the conclusion correct	Y	Action to be taken: No additional action to be taken at this time	
Review date for action	N/A		
Owner of action	N/A		
Signature			
Date	15/12/2025		

9. Review Date Information	
Date deliverable development started	Review of the categories of persons placed on LFR watch lists started in June 2026
Date of last EIA	Created / signed on 15/12/25 for first LFR deployment on 22/12/25
Reason for this review	Reviewed due to an update of categories of persons that TVP wishes to locate at an LFR deployment via addition to a 'watch list'. No other changes to the LFR system or how the equipment is set up at the deployment location. No changes required to the existing mitigating controls.

Date of next review	01/08/2027
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REVIEW & SIGN OFF: Once the form has been completed, please send to the EIA Mailbox eia@thamesvalley.police.uk for final sign off and review by the EIA team.

Document Review Information			
Version History	Version Date	Requestor of Change	Summary of Change(s)
0.1	09/12/2025	N/A	First Draft
1.0	12/12/2025	Senior Information Governance Manager & Head of Intelligence	Final changes for publication before implementation
2.0	29/07/2026	Senior Information Governance Manager & Head of Intelligence	Updated use cases for inclusion of persons on watch list