

Equality Impact Assessment – Deployment of Live Facial Recognition Technology

Strategy, Policy & Procedure

Greater Manchester Police

Equality Impact Assessment (EIA) for Strategies, Policies and Procedures

Before completing this form, you may find it useful to refer to the College of Policing guidance on Equality Impact Assessments. This can be found [here](#) and [here](#).

All public bodies, including the Chief Constable have a legal duty under the Equality Act 2010 (called the 'Public Sector Equality Duty' or 'PSED') to have due regard when exercising their functions of the need to eliminate discrimination, harassment, victimisation and other prohibited conduct, advance equality of opportunity, and foster good relations between persons who share a relevant protected characteristic and those who do not.

The aim of an equality impact assessment (EIA) (or an updated EIA) is to enable the consideration of the equality implications of your strategy, policy or procedure on those groups detailed below, to consider if there are ways to proactively advance equality and consider how adverse risks could be eliminated. The EIA must be completed regardless of whether the policy may appear neutral in its effect.

1. EIA Version Control			
Version no.	Date	Author	Comments
1.0	03/12/24	Insp Jon Middleton	New EIA
1.1	15/09/25	Ch.Insp Booth	Minor updates / amendments.
1.2	20/10/25	Ch.Insp Booth	Updates to reflect peer review around mitigating actions.

2. Policy Details	
Name of the strategy, policy or procedure being assessed, and a brief overview of its aims and objectives	<p>GMP Policy and Procedure documents for Deployment of Live Facial Recognition Technology.</p> <p>The aims of the policy are to:</p> <ul style="list-style-type: none"> To provide an overview of LFR technology and it's use for GMP officers, staff & the public. To establish a governance structure for deployment of LFR in GMP, ensuring that GMP's use of LFR is legally compliant and accountable. To provide policy guidance on planning LFR deployments. To provide policy guidance on using LFR operationally. To provide policy guidance on reviewing use of LFR.

Is it new or existing?	New
Policy owner (role, branch/district)	ACC Jackson (Crime, Forensics & Intelligence)
EIA carried out by (role, branch/district)	Insp Middleton (FIB)
Date of completion	15/09/25

3. Evidence Gathering and Engagement

- a. What **evidence** has been used for this assessment? For example, national statistics, demographic data, research statistics
- 1) National Physical Laboratory: Facial Recognition Technology in Law Enforcement [frit-equitability-study_mar2023.pdf](#)
 - 2) ICO Report into Police Use of Facial Recognition, October 2019 [ICO investigation into how the police use facial recognition technology in public places](#)
 - 3) London Police Ethics Panel – Final Report on Live Facial Recognition – May 2019 [live facial recognition final report may 2019.pdf](#)
 - 4) Alan Turing Institute - future of Biometric Technology for Policing & Law Enforcement March 2024 [cetas_research_report_-_the_future_of_biometric_technology_for_policing_and_law_enforcement_0.pdf](#)
 - 5) Face Recognition Performance: Role of Demographic Information (Klare et al) [klare2012demographics.pdf](#)
 - 6) Gender Shades: Intersectional Accuracy Disparities in Commercial Gender Classification Buolamwini and Gebru (2018). [buolamwini18a.pdf](#)

Who have you **engaged and consulted with** as part of your assessment? For example, community groups, Independent Advisory Groups, staff associations/networks

- Consultation records will be stored within the Change Branch MS Teams live facial recognition channel documents section.
- The below is a record of consultation that has taken place.

Who?	Why?	When?	Outcome
Various GMP representatives including District, IMU, Legal and GMCA representatives.	Initial consultation internally and with GMCA	15/10/24	Actions documented in Change Branch MS teams channel documents.
Kate Green – Deputy Mayor – Safer & Stronger Communities	Initial briefing to establish if use of FR is supported and any concerns over use.	17/10/24	Briefed by DCS Griffith on GMP plans for LFR via teams. No actions raised.
Information Commissioners Office	Initial engagement for peer review of DPIA and associated policies	08/08/25	Observations and guidance notes incorporated into GMP's finalised documentation set.
GMP Ethics Committee	Initial engagement to discuss technology and considerations for operational	12/03/25 & 19/05/25	Feedback incorporated into working principles esp re further stakeholder engagement

	deployment.		
Membership of National FRT Board	Engagement re peer support, best practice and QA for documentation	Ongoing since October 2024	Feedback incorporated into go-live documentation.
Forcewide Engagement through “show & tell” sessions with LFR vans	To engage workforce and build positive view of LFR technology	Sept 2025	Part of engagement and wider comms strategy to make effective use of technology.

4. Impact on different groups of the public and/or officers and staff

Specific groups to consider¹	Potential impact on this group and actions taken to mitigate impact and advance equality, diversity and inclusion
<p>Age People of different ages</p>	<p>Facial images uploaded will be sourced whether from existing police records or from family and friends of persons reported as missing.</p> <p>The reference image database, consequently, may have images of subjects that were taken a number of years ago. The age of criminal responsibility in the UK is 10 years old. Image capture via Custody Imaging on which FRT technology is reliant, is dependent on the age, date and time at which the custody image was taken.</p> <p>In addition, 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 FRT is in general significantly lower for children younger than 13 years old. They associate this to “rapid growth and change in facial appearance”.</p> <p>Due consideration of NPL testing indicates that the NEOFACE technology, deployed correctly, mitigates race, gender and age.</p> <p>In compiling watchlists due LFR operators should review APP factors around age and consider proportionality and justification for inclusion.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>
<p>Disability Disabled people, including</p>	<p>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 is a</p>

¹ All of the terms in bold is the terminology used in the [Equality Act 2010](#).

<p>those with mental health issues.</p>	<p>significant change to their facial features. Genetic conditions such as neurofibromatosis also cause progressive facial change.</p> <p>Consequently, the images that GMP hold may not accurately reflect their present facial appearance.</p> <p>In compiling watchlists due LFR operators should review APP factors around disability (where data is available) and consider proportionality and justification for inclusion.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>
<p>Gender reassignment Trans and non-binary people</p>	<p>The Facial Recognition Technology (FRT) probe image is based on the mapping of key facial indicators when comparing a reference image database image for an individual. Therefore, the functionality, accuracy, and performance of FRT may be less effective if changes to facial appearance have occurred between the time the reference image database image was taken, and the time a comparison is made.</p> <p>This may impact persons who are transitioning from one gender to another if gender presentation differs from the time the comparator image was taken. It may also affect trans, non-binary and gender-fluid people who adopt to flex between gender presentations.</p> <p>Reports suggest that facial contouring using cosmetic make-up application may impact on FRT system’s performance.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>
<p>Marriage and civil partnership A person has the protected characteristic of marriage and civil partnership if the person is married or is a civil partner.</p>	<p>There is no anticipated differential impact to those who are married or in civil partnerships.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>
<p>Pregnancy and maternity</p>	<p>There is no anticipated differential impact to this group.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>
<p>Race People from minority ethnic backgrounds and</p>	<p>Greater Manchester is a diverse multi-cultural area which incorporates both rural and metropolitan areas. It is therefore important to ensure that the technology is not seen to cause division</p>

<p>communities</p>	<p>between persons of different race/ethnicity. 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>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 white individuals, and poor for women and black individuals.</p> <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>Due consideration of NPL testing indicates that the NEOFACE technology, deployed correctly, mitigates race, gender and age.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>
<p>Religion or belief People with different religions and/or beliefs</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 i.e. Amish, refuse to allow themselves to be photographed. Sensitivity therefore needs to be taken with cross-community dialogue to ensure the deployment is both necessary and proportionate. Current testing indicates that the NEOFACE algorithm is still effective without the need to remove headwear or coverings.</p> <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>All GMP officers and staff receive Diversity Awareness training.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered,</p>

	human input which further supports equality for groups.
Sex Both men and women	<p>Social observation indicates women change their appearance more frequently and significantly than men which may impact the performance of LFR.</p> <p>Reports suggest that facial contouring using cosmetic make-up application may impact on the LFR system's performance.</p> <p>Due consideration of NPL testing indicates that the NEOFACE technology, deployed correctly, mitigates race, gender and age.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>
Sexual orientation LGBTQ+ people	<p>There is no anticipated differential impact based on marriage or civil partnership</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>
Other groups Not defined as protected characteristics, but who may be impacted by your policy (e.g., travelling/gypsy community, ex-armed forces, people from lower socio-economic backgrounds, carers etc.)	<p>There is no anticipated differential impact to other groups.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>

5. Action Planning

Complete this section if the EIA has identified additional steps that need to be taken to address adverse outcomes for particular groups (either by way of eliminating or minimising this risk), or to collect additional evidence to inform the EIA.

Issue Identified	Planned Action	Lead and Timeframe
General	1) Using overt LFR technology in a responsible, transparent, fair and ethical way, in	Insp Middleton - ongoing

<p>considerations around equality</p>	<p>accordance with all relevant law and only when other, less intrusive methods would not viably achieve the legitimate and lawful policing objectives.</p> <ol style="list-style-type: none"> 2) Strengthening and consistently developing the accuracy and functionality of LFR technology. 3) Building public trust and confidence in the development, management and use of LFR by working to a force LFR communication strategy that promotes proactive engagement with the public about the use of LFR and explains how issues such as privacy, equality and transparency will be addressed. 4) Ongoing community engagement, through force's existing channels, to promote the use of LFR and address concerns – the Centre for Data Ethics and Innovation (CDEI) document 'Addressing trust in public sector data sharing' provides further guidance. 5) Developing chief officer and PCC (or equivalent) strategic governance, with separation from operational decisions and decision makers where possible, to ensure sufficient independence and rigour when reviewing a force's use of LFR. 6) Maintaining good operational governance through a command structure that incorporates operational and technical leads for the deployment of LFR. Ensuring clear decision making and accountability, specifying that the authorisation given by an authorising officer (AO) to deploy LFR in support of a policing operation should be made by an officer not below the rank of superintendent, and should be recorded in writing. 7) Transparently identifying, managing, and mitigating reputational and organisational risk to the force continuously learning from deployments, identifying lessons to learn from each deployment. 8) Maintaining the security of both the LFR system and data contained within it. 9) Liaising with independent regulators where appropriate. 10) Identifying the metrics against which the success of deployments will be judged, including setting the force's targeted false alert rate in policy and continuously assessing the success of deployments against these metrics, to ensure ongoing proportionality of its use and to provide reassurance regarding the ongoing performance of the technology and algorithms. 	
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	<p>11) Ensuring that when LFR is used to locate those on a watchlist and there is no match with a person on the watchlist on passing the LFR system, the biometric template created by the facial recognition technology should be instantaneously (or near instantaneously) and automatically deleted, without need for any human intervention.</p>	
<p>Age Use of older source images. Changes to appearance of children with time. Lower accuracy for children younger than 13yrs.</p>	<p>Watchlist creation will be done as close to the time of the deployment as possible and no more than 24hrs prior to the deployment.</p> <p>GMP LFR Policy and process will be that if LFR software highlights a match the operator and engagement officers will check those images prior to engagement and during engagement.</p> <p>At a threshold of 0.64, the NPL confirm testing shows the false positive identification rate was equitable between all age groups tested</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>	Insp Middleton 1/5/24
<p>Disability Facial changes since image being used was taken.</p>	<p>Should a person's face have changed for any of the reasons above (or an additional / different reason) 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.</p> <p>GMP LFR Policy and process will be that if a match is highlighted, this is the checked by the operator for accuracy before additional activity is considered and then by the engagement officer as part of the engagement process.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>	Insp Middleton 1/5/24
<p>Gender reassignment The functionality,</p>	<p>Should a person's face have changed for any of the reasons above (or an additional / different reason) between their image being taken / provided and an LFR deployment, it would</p>	

<p>accuracy, and performance of FRT may be less effective if changes to facial appearance have occurred between the time the reference image database image was taken, and the time a comparison is made.</p>	<p>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.</p> <p>GMP LFR Policy and process will be that if a match is highlighted, this is the checked by the operator for accuracy before additional activity is considered and then by the engagement officer as part of the engagement process.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>	<p>Insp Middleton 1/5/24</p>
<p>Race</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. 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 white individuals, and poor for women and black individuals.</p>	<p>GMP LFR Policy and process will be that the system setting will be equal to or above the value where no FRT System bias is detected (0.64 with the current FRT algorithm). The Threshold value may be lowered based on the intelligence case with a full rationale detailed in the GMP LFR Application / Written Authority Document.</p> <p>GMP LFR Policy and process will be that if a match is highlighted, this is the checked by the operator for accuracy before additional activity is considered and then by the engagement officer as part of the engagement process.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>	<p>Insp Middleton 1/5/24</p> <p>Insp Middleton 1/5/24</p>

<p>Religion or belief</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 i.e. Amish, refuse to allow themselves to be photographed.</p>	<p>Watchlist creation will be done as close to the time of the deployment as possible and no more than 24hrs prior to the deployment.</p> <p>GMP LFR Policy and process will be that if LFR software highlights a match the operator and engagement officers will check those images prior to engagement and during engagement.</p> <p>Should a person be wearing some form of 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.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>	<p>Insp Middleton 1/5/24</p> <p>Insp Middleton 1/5/24</p> <p>Insp Middleton 1/5/24</p>
<p>Sex</p> <p>Frequency and significance of appearance change. Reports suggest that facial contouring using cosmetic make-up application may impact on the LFR system's performance.</p>	<p>Watchlist creation will be done as close to the time of the deployment as possible and no more than 24hrs prior to the deployment.</p> <p>GMP LFR Policy and process will be that if LFR software highlights a match the operator and engagement officers will check those images prior to engagement and during engagement.</p> <p>The final decision to engage with a subject identified remains with the officer based an NDM decision. This allows for a considered, human input which further supports equality for groups.</p>	<p>Insp Middleton 1/5/24</p> <p>Insp Middleton 1/5/24</p>

6. Outcome of EIA

An EIA has been undertaken on this policy as part of the requirements under the PSED. The policy will be submitted to Chief Officers on the following basis (please tick one box):

	Approve – no change	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.
	Amend the policy	<p>This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.</p> <p>This should be done before the policy is implemented. Where this cannot happen the action plan must outline how you are going to achieve this</p>
	Continue with the policy	<p>This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate.</p> <p>In cases where you believe discrimination is not unlawful because it is objectively justified, it is particularly important that you record what the objective justification is for continuing the policy, and how you reached this decision.</p>
	Stop and remove the policy	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.

7. Monitoring and Review

How will you monitor the impact of your policy/process once it has been put into effect?

Regular review (at least annually) as part of GMP facial recognition working group initially then as part of wider governance framework. Additional review following any proposed changes to policy or procedure and the publication of any new & relevant research.

Review will include external and internal consultation.

Sign off from Head of Department or Service: DCS Neil Jones.

Review Date (must match next review date of the policy): Sept 2026