



**Live Facial Recognition – Op Overwatch
Equality Impact Assessment**

Appendix A – Equality Impact Assessment.

<p>Live Facial Recognition(LFR)- Op Overwatch Equality Impact Assessment (EIA)</p>

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Author:	LFR Operational Lead
Date:	10/02/2026

Version	Date Issued	Brief Summary of Change	Owner's Name
V1	10/02/2026	Final	LFR Operational Lead



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1. Establishing necessity

Do you believe there might be an impact on BTP officers, staff, or service users (i.e. anyone) because of their:

Age; sex (gender); or sexual orientation; gender identity or reassignment; religion or belief; race; pregnancy or maternity; marital or civil partnership status; disability; Other Issues

Y	N
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Does this proposal / policy have any relevance to:		Internal, relevant to staff / or working practices	External, relevant to service delivery	Not relevant to either
A	Age	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B	Sex	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
C	Sexual Orientation	<input type="checkbox"/> No	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
D	Gender Identity/Reassignment	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
E	Religion or Belief	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
F	Race	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	No
G	Pregnancy, Maternity, Paternity	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> No
H	Marital and Civil Partnership	<input type="checkbox"/> No	<input type="checkbox"/> No	Yes
I	Neurodiversity	<input type="checkbox"/> No	<input type="checkbox"/> No	Yes
J	Disability	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
K	Other Issues including socio-economic and caring responsibilities	<input checked="" type="checkbox"/> No	<input type="checkbox"/> No	Yes



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Where you are using data and the potential sharing of data that may identify individuals protected characteristics please email: InformationSharing@btp.police.uk for advice.



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2. If yes to any, please describe what the potential impact is. Why do you believe there might be an impact?

INTERNAL IMPACT				
Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring
<p>AGE: BTP Employees</p> <p>No Impact</p>	<p>The age of employability is set by the national police recruitment guidelines.</p> <p>The process to join the LFR team will be advertised on a platform accessible to all staff members.</p>	N/A	N/A	N/A
<p>SEX: BTP Employees</p> <p>No Impact</p>	<p>The process to join the LFR team will be advertised on a platform accessible to all staff members.</p> <p>Recruitment will be auditable, transparent and set to rank specific framework.</p> <p>BTP are an equal opportunities employer</p>	N/A	N/A	N/A



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<p>SEXUAL ORIENTATION: BTP Employees</p> <p>No impact</p>	<p>The process to join the LFR team will be advertised on a platform accessible to all staff members.</p> <p>Recruitment will be auditable, transparent and set to rank specific framework.</p> <p>BTP are an equal opportunities employer</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>GENDER IDENTITY/REASSIGNMENT: BTP Employees</p> <p>No impact</p>	<p>The process to join the LFR team will be advertised on a platform accessible to all staff members.</p> <p>Recruitment will be auditable, transparent and set to rank specific framework.</p> <p>BTP are an equal opportunities employer</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Religion or Belief: BTP Employee</p> <p>No impact</p>	<p>The process to join the LFR team will be advertised on a platform accessible to all staff members.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>



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	<p>Recruitment will be auditable, transparent and set to rank specific framework, there will be provision for any member of staff to apply for roles irrespective of their religion or belief.</p> <p>BTP are an equal opportunities employer and although there is no legal obligation to facilitate attendance at religious worship, where a member of the team requires flexibility for religious observance this will be considered and where possible reasonable adjustments made dependant of operational necessity.</p>			
<p>Race: BTP Employee</p> <p>No Impact</p>	<p>The process to join the LFR team will be advertised on a platform accessible to all staff members.</p> <p>Recruitment will be auditable, transparent and set to rank specific framework.</p> <p>BTP are an equal opportunities employer</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>



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<p>PREGNANCY OR MATERNITY/ PATERNITY: BTP</p> <p>Potential negative impact</p>	<p>The process to join the LFR team will be advertised on a platform accessible to all staff members.</p> <p>Recruitment will be auditable, transparent and set to rank specific framework.</p> <p>BTP are an equal opportunities employer and applications from pregnant or staff on maternity leave will be assessed on the same basis as those that are not.</p> <p>The role of LFR Operator Engineer will require manual handling of the equipment during its set up which is expected to weigh in total over 200kg and the operators are expected to work in a public facing role during deployments.</p> <p>A member of staff who is pregnant should be supported to remove these risks and under an appropriate risk assessment</p> <p>Staff on maternity leave may not have an awareness that there are vacancies within</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
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	the LFR team, Line managers should ensure staff on maternity leave have equal provision to access to available vacancies.			
Marital and Civil Partnership: BTP Employee: No impact	The process to join the LFR team will be advertised on a platform accessible to all staff members. Recruitment will be auditable, transparent and set to rank specific framework. BTP are an equal opportunities employer	N/A	N/A	N/A
NEURODIVERSITY: BTP Employees No impact	The process to join the LFR team will be advertised on a platform accessible to all staff members. Recruitment will be auditable, transparent and set to rank specific framework. BTP are an equal opportunities employer	N/A	N/A	N/A
DISABILITY: BTP Employees	The role of LFR Operator Engineer will require manual handling of the equipment during its	N/A	N/A	N/A



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<p>Potential negative impact</p>	<p>set up which is expected to weigh in total over 200kg.</p> <p>Those with a physical disability may be unable to undertake the role due to the necessity to move the equipment between storage and deployment sites.</p> <p>As the role is for Police constables this is mitigated by the fact that constables are required to undertake a basic level of fitness to enable them to undertake their front-line duties, this level of fitness is appropriate for that required in this role.</p>			
<p>OTHER ISSUES INCLUDING SOCIO-ECONOMIC AND CARING RESPONSIBILITIES: BTP Employees</p>	<p>Not impacted</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

EXTERNAL IMPACT

<p>Potential positive / negative issues / impacts</p>	<p>Activity</p>	<p>Role Holder</p>	<p>Action By Date</p>	<p>Progress/Timescale/ Monitoring</p>
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<p>AGE:</p> <p>Potential Negative impact</p>	<p>Facial images uploaded into the reference database are sourced from custody records, which may include images taken several years ago. The age of criminal responsibility in the UK is 10 years old, meaning custody images can be captured from a young age. Facial Recognition Technology (FRT) relies on these images, and its accuracy can be affected by the age, date, and time at which the image was taken.</p> <p>The European Union Agency for Fundamental Rights report <i>Facial Recognition Technology: Fundamental Rights Considerations in the Context of Law Enforcement</i> (2019) Facial recognition technology: fundamental rights considerations in the context of law enforcement highlights that as children grow, the accuracy of biometric matching diminishes. The risk of a failed match increases when images recorded at a young age are compared more than five years later. The report further notes that FRT accuracy is</p>	<p>LFR Business Owner</p> <p>LFR Operational Lead</p>	<p>Ongoing</p>	<p>To be reviewed at conclusion of 6 month pilot</p>
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	<p>significantly lower for children under 13 years old, primarily due to rapid growth and changes in facial appearance.</p> <p>There is also a risk of older images being utilised where a custody image is held for a number of years it may not be reflective of the current age of the nominal.</p> <p>Mitigation: Any child added to a watchlist must be authorised by the Gold Commander following a risk assessment considering offence seriousness, public safety, and misidentification risk. For children under 13, additional legal advice is mandatory. All decisions will be formally recorded.</p>			
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	<p>Operators are charged to actively manage the performance of the LFR system during a deployment, any concerns should be raised to the Bronze and Silver commanders who have the authority to halt any deployment.</p> <p>Post deployment any false alerts will be examined to determine if there is a trend or overriding cause, performance data will be made available to the facial recognition Technology board to consider the future use of LFR.</p>			
<p>SEX: Potential negative impact</p>	<p>Gender, ethnicity, and age-related biases in Facial Recognition Technology (FRT) have received considerable attention from academics and government bodies. Notable studies include Klare et al. (2012) Face Recognition Performance: Role of Demographic Information IEEE Journals & Magazine IEEE Xplore, and Buolamwini & Gebru (2018)</p>	<p>LFR Business Owner</p> <p>LFR Operational Lead</p>	<p>Ongoing</p>	<p>To be reviewed at conclusion of 6 month pilot</p>



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Potential positive impact	<p>https://proceedings.mlr.press/v81/buolamwini18a/buolamwini18a.pdf</p> <p>Buolamwini and Gebru’s findings were widely reported, highlighting significant algorithmic bias: performance was highest for men and individuals with lighter skin tones, and lowest for women and individuals with darker skin tones. An intersectional effect was observed, with the poorest performance for Black women.</p> <p>Klare et al. (2012) also identified age as a factor influencing algorithmic performance, with the lowest accuracy reported for individuals aged 18–30. Social observations suggest that women may change their appearance more frequently and significantly than men, which could further impact Live Facial Recognition (LFR) performance.</p>			
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	<p>Additionally, reports indicate that facial contouring through cosmetic makeup application can affect system accuracy.</p> <p>Inbuilt in the LFR policy is the addition to the watchlist of those with criminal/civil orders relating to sexual offending and Violence Against Women and Girls (VAWG) seeking to better manage offenders by ensuring their compliance with any conditions imposed on them.</p> <p>The deployment of LFR also seeks to identify those wanted by the police and the courts, when considering the proportionality of adding a wanted person to a watchlist any offence with a marker for VAWG can be included regardless the seriousness of the offence or warrant grading.</p>			
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	<p>BTP accept that watchlists are highly likely to contain more men than women in their makeup, in 2023 78% of individuals dealt with by the criminal justice system were male and 22% female and historically men commit a higher proportion of serious offences than women. The policy targets those who are wanted for crimes of a serious nature or have a specific victim attached to the report this means that men are more likely to be subject to provisions of the watchlist than women.</p> <p>Mitigation</p> <p>Officer engagement: LFR is a tool that assists police officers locate wanted people. LFR does not qualify as formal identification and</p>			
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	<p>does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing the system 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 an Engagement occurs, further action is not an automatic consequence, the officer would need a lawful basis to take any further action (such as an arrest).</p> <p>Operators are charged to actively manage the performance of the LFR system during a deployment, any concerns should be raised to the Bronze and Silver commanders who have the authority to halt any deployment.</p> <p>Post deployment any false alerts will be examined to determine if there is a trend or</p>			
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	<p>overriding cause, performance data will be made available to the facial recognition Technology board to consider the future use of LFR.</p>			
<p>SEXUAL ORIENTATION: No Impact</p>	<p>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. The functionality, accuracy and performance of LFR has no bearing on an individual’s sexual orientation. The protected characteristic of Sexual Orientation does not impede on changes and/or adaptations to a subject’s face.</p>	<p>LFR Business Owner LFR Operational Lead</p>	<p>Ongoing</p>	<p>To be reviewed at conclusion of 6 month pilot</p>



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<p>GENDER IDENTITY/REASSIGNMENT:</p>	<p>The Facial Recognition Technology (FRT) probe image—uploaded by BTP for comparison against the reference image database—relies on mapping key facial indicators. The functionality, accuracy, and performance of FRT may be reduced if significant changes to facial appearance occur between the time the reference image was captured and the time of comparison. This may affect individuals transitioning from one legal gender to another where gender presentation differs from the comparator image. It may also impact trans, non-binary, and gender-fluid individuals who vary their gender presentation. Additionally, reports suggest that facial contouring through cosmetic makeup application can influence FRT system performance.</p> <p>Mitigation: Any individual known to be undergoing gender reassignment requires</p>	<p>LFR Business Owner</p> <p>LFR Operational Lead</p>	<p>Ongoing</p>	<p>To be reviewed at conclusion of 6 month pilot</p>
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	<p>Gold Commander authorisation before inclusion on a live watchlist.</p> <p>Officer engagement: LFR is a tool that assists police officers locate wanted people. LFR does not qualify as formal identification and does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing the system 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 an Engagement occurs, further action is not an automatic consequence, the officer would need a lawful basis to take any further action (such as an arrest).</p>			
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	<p>Operators are charged to actively manage the performance of the LFR system during a deployment, any concerns should be raised to the Bronze and Silver commanders who have the authority to halt any deployment.</p>			
<p>RELIGION OR BELIEF:</p>	<p>The wearing of religious headwear or coverings, as well as the growing of facial hair, may affect the effectiveness of Facial Recognition Technology (FRT). Additionally, certain religious or cultural groups—for example, the Amish—may refuse to be photographed. Sensitivity is therefore required when engaging in cross-community dialogue to ensure that deployment of FRT is both necessary and proportionate. Respect for diversity and awareness training is embedded within BTP’s training.</p>	<p>LFR Business Owner</p> <p>LFR Operational Lead</p>	<p>Ongoing</p>	<p>To be reviewed at conclusion of 6 month pilot</p>



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	<p>Mitigation: Deployments include clear signage and voluntary participation. Alternative routes will be provided for those who do not consent. Diversity and awareness training is embedded in BTP programmes.</p> <p>LFR is a tool that assists police officers locate wanted people. LFR does not qualify as formal identification and does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing the system 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 of whether religion or belief may have affected the generation of an Alert (for instance, if a person’s face has been obscured by a religious head covering). Even where an Engagement occurs, further action</p>			
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	<p>is not an automatic consequence, the officer would need a lawful basis to take any further action (such as an arrest)</p> <p>Operators are charged to actively manage the performance of the LFR system during a deployment, any concerns should be raised to the Bronze and Silver commanders who have the authority to halt any deployment.</p>			
<p>RACE: Potential negative impact</p>	<p>BTP operates nationwide, including in diverse, multicultural areas encompassing both rural and metropolitan regions. It is therefore essential to ensure that the technology does not create or appear to create divisions between individuals of different racial or ethnic backgrounds.</p> <p>Facial Recognition Technology (FRT) relies on mapping key facial indicators, which depends</p>	<p>LFR Business Owner</p> <p>LFR Operational Lead</p>	<p>Ongoing</p>	<p>To be reviewed at conclusion of 6 month pilot</p>



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	<p>on the algorithm’s ability to accurately detect these indicators within an image. Environmental factors such as ambient lighting and shadows can affect performance. Additionally, variations in skin pigmentation and the use of contouring makeup may influence detection accuracy.</p> <p>Ethnicity-related biases in FRT have been widely studied, particularly by academic and governmental bodies. Notable research includes Klare et al. (2012), NIST (2018), and Buolamwini & Gebru (2018). The latter study received significant attention for highlighting algorithmic bias in relation to gender and ethnicity: performance was highest for men and individuals with lighter skin tones, and lowest for women and individuals with darker skin tones.</p> <p>Mitigation: Bronze Commanders will review watchlists prior to deployment. If demographic representation is</p>			
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	<p>disproportionate to the operational environment, they may cancel the operation on ethical grounds.</p> <p>Policy criteria: the strict set LFR deployment criteria within the LFR Policy ensures no individual and/or group are targeted.</p> <p>Officer Engagement: LFR is a tool that assists police officers locate wanted people. LFR does not qualify as formal identification and does not make decisions that result in any person being spoken to. It provides a guide to officers about which people passing the system 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 is a factor in generating an Alert. Even where an Engagement occurs, further action is not an automatic consequence, the officer</p>			
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	<p>would need a lawful basis to take any further action (such as an arrest).</p> <p>Operators are charged to actively manage the performance of the LFR system during a deployment, any concerns should be raised to the Bronze and Silver commanders who have the authority to halt any deployment.</p>			
<p>PREGNANCY OR MATERNITY/ PATERNITY:</p> <p>No Impact</p>		<p>LFR Business Owner</p> <p>LFR Operational Lead</p>		<p>To be reviewed at conclusion of 6 month pilot</p>
<p>MARRIAGE AND CIVIL PARTNERSHIP:</p> <p>No Impact</p>		<p>LFR Business Owner</p>		<p>To be reviewed at conclusion of 6 month pilot</p>



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		LFR Operational Lead		
NEURODIVERSITY: No Impact		LFR Business Owner LFR Operational Lead		To be reviewed at conclusion of 6 month pilot
DISABILITY:	Facial disfigurement Individuals may experience facial changes for several reasons, including trauma, medical interventions, or reconstructive surgery, which can significantly alter facial features. Certain genetic conditions, such as neurofibromatosis, can also cause progressive facial changes. As a result, images held by BTP may not accurately	LFR Business Owner LFR Operational Lead		To be reviewed at conclusion of 6 month pilot



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	<p>reflect an individual’s current facial appearance.</p> <p>Mitigation Any person with a relevant disability added to a watchlist must be authorised by the Gold Commander following a risk assessment considering offence seriousness, public safety, and misidentification risk.</p> <p>Mobility</p> <p>The operational activity includes setting up of a zone of recognition within a railway station where biometric data is processed, current legislation means that this activity must also allow persons not wishing to have their biometric data processed an alternate route around the activity that still allows them to go</p>			
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	<p>about their lawful activity without obstructing access to railway services There is the potential to affect those with mobility impairments by making the alternate route too long or to involve use of stairs where there may be no provision for those in wheelchairs or who are unable to navigate these unaided.</p> <p>Mitigation All deployments will be subject to a site visit prior to the event with partners from the rail industry to discuss placement of the LFR equipment, where the zone/s of recognition will be and how this would impact an individual, the alternate route will be walked by the LFR team and Bronze commander to risk assess this from a mobility perspective prior to setting the deployment site, and discussed with the partners from the station who will have knowledge of the requirements of the equalities act and are able to advise of step free routes, rest areas and any other facilities</p>			
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	<p>that are available or would have to be provided to make the alternate route viable, the alternate agreed route will be recorded on video and held by the LFR team for reference.</p> <p>Visual impairment</p> <p>LFR deployments are designed to be highly visible and give visual warnings to individuals that are about to enter the area of operational activity by way of signage, for those who are visually impaired they may not be able to read or have any knowledge of the activity that is occurring to exercise their right to avoid the activity, they may also be at risk of impacting the equipment that is added to the railway concourse which they may not be used to if they are blind and have aid to assist them navigate the station.</p>			
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	<p>Mitigation Signage to be placed outside the area of operational activity has been produced at A1 size with large wording and high contrast between lettering and background colours aid to those with visual impairment or a neurodiversity to read the information, BTP have used the agreed National Standard posters for LFR to ensure that our approach is uniform with other forces who deploy LFR nationally, information about deployments is also available on the BTP website so it is accessible to a wider group of people.</p> <p>The LFR equipment was designed to be highly visible, it is bright yellow in colour and when deployed will be surrounded by black and yellow striped Tensa barriers to prevent any</p>			
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	<p>visually impaired person colliding with the metal unit or any of its protruding metal parts, there will also always be an officer placed near the equipment who will be able to assist any person experiencing difficulties due to the presence of the equipment.</p> <p>Unable to mitigate/residual risk</p> <p>For those who are classed as severely visually impaired/blind we have considered audible warnings that LFR is in operation, however British Transport Police do not own or operate any public address systems within railway stations and so any public announcement would have to be by the company that operates the station and would require their agreement to broadcast any message and frequency of transmission. We are conscious that station wide Tannoy announcements advising the public of LFR operations may give rise to apprehension the</p>			
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	<p>entire station is under surveillance or add confusion as to what area the defined zone of recognition covers. We will discuss on a location by location basis, with station operators, whether we can utilise public messaging Tannoy systems to inform members of the public (especially our blind community) that an LFR deployment is underway.</p> <p>Policy criteria: the strict set LFR deployment criteria within the LFR Policy ensures no individual and/or group are targeted.</p> <p>Operators are charged to actively manage the performance of the LFR system during a deployment, any concerns should be raised to the Bronze and Silver commanders who have the authority to halt any deployment.</p>			
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<p>OTHER ISSUES INCLUDING SOCIO-ECONOMIC AND CARING RESPONSIBILITIES:</p> <p>Potential impact</p>	<p>There is the possibility that the deployment of LFR technology could have an impact on businesses that operate on the railway concourse.</p> <p>There is the potential negative impact as an LFR deployment may impact the level of footfall/customers at these businesses thereby affecting revenue should people avoid the area where the system is operating, this could then have an impact in stakeholder engagement as if revenue drop below a certain level due to the actions of the landowner they have to cover the cost to the business.</p> <p>There is also a potential positive impact as an LFR deployment is highly visible it may dissuade those seeking to commit retail crime from attending the area on the day of</p>	<p>LFR Business Owner</p> <p>LFR Operational Lead</p>	<p>Ongoing</p>	<p>To be reviewed at conclusion of 6 month pilot</p>



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	<p>the deployment and also improving the confidence and reassurance of staff in the stores as well as commuters.</p> <p>The deployments will not take place at any location that would significantly impact a person’s ability to seek medical help or to obtain prescribed medication from an authorised pharmacy</p>			
<p>THE PUBLIC:</p> <p>Positive impact</p>	<p>LFR is a policing tactic designed to locate those who are not compliant with the process of justice, those wanted by police for high harm offences and those with conditions imposed upon them due to their perceived threat to members of the community. By locating high harm offenders and bringing them to justice and more effectively monitoring the behaviour of convicted offenders this should bring about a safer</p>	<p>LFR Business Owner</p> <p>LFR Operational Lead</p>	<p>Ongoing</p>	<p>To be reviewed at conclusion of 6 month pilot</p>



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<p>Negative impact</p>	<p>railway and mean less members of the public come to harm on it.</p> <p>LFR has been described as having a “chilling” effect this broadly means it prevents some members of the public behaving in a lawful manner which they are entitled to do including attending places of education, worship or protest.</p> <p>Mitigation</p> <p>BTP LFR will only be deployed within the confines of railway stations not directly outside places of education or worship, we accept that persons attending places of education and worship do use the railway network to travel, should a potential deployment take place where it would have an unjustifiable effect on members of these groups highlighted by the local Station</p>			
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	<p>Commander or stakeholders the operational command team will review the operation and may postpone the deployment.</p> <p>The BTP Policy does not support the planned deployment of LFR during a planned protest unless there are significant concerns for the safety of the public from persons wanted by the police or the courts, we accept that there may be occasions where a preplanned deployment of LFR may be at the site of a spontaneous protest and it is for the Bronze Commander to decide if the operation remains ethical or to cease the deployment.</p>			
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3. Does the policy, proposal or project contribute to meeting the general equality duties to which BTP is subject? These are:

- **Eliminating unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act**
- **Advancing equality of opportunity between people who share a protected characteristic and those who do not**
- **Fostering good relations between people who share a protected characteristic and those who do not**

Background:

Live Facial Recognition is an AI-driven technology that uses cameras (static or mobile) to capture real-time facial images and compare them against a database of known individuals. Unlike traditional facial recognition, which works on still images post-event, LFR operates in real time, enabling immediate identification and alerts.

Key Benefits:

- Improved public safety.
- Enabling the identification of suspects amongst large crowds, LFR could help decrease stops and searches on law-abiding citizens and reduce public outrage over unjustified stops and searches.
- The knowledge of the presence of LFR serves as a target hardening measure that can reduce crime in a given area.
- As a dynamic resource to be deployed to Critical Incident Management.
- Supporting the timely apprehension of wanted persons this reduces the risk to individuals but also the impact on victims, their families and witnesses.
- As a pre-planned resource for large public gatherings, it may deter public order situations and criminality from ensuing and increase safety of the event along with providing reassurance to persons present by a visible pro-active policing tool.



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- Enable early apprehension of subjects who are wanted for outstanding offences, currently wanted on warrant, and discourage/prevent subjects committing further offences.
- Allowing investigations to be conducted with the least intrusion possible by minimising the need for circulation on other wide scale and international platforms such as social media.
- LFR will assist officers where traditional policing methods may struggle to yield results. An individual officer cannot possibly remember all the faces of wanted persons on a Watchlist due to its size. Although the final determination will be made by the Engagement Officer, LFR helps to reduce Human error.
- Reduce the requirement for repeated and often confrontational arrest enquiries at residential addresses. As it is also less resource intensive the Deployment of LFR also allows more efficient resourcing of force priorities.
- Increases effectiveness to assist in locating wanted nominals from outside of the force area or travelling OCG's. This improves collaboration between forces and improves the effectivity of designated operations where the involved persons operate a transient lifestyle or target specific events.
- Modernises and up-skills the workforce.

By combining cutting edge technology and a skilled workforce, offenders can be brought justice more quickly. Facial Recognition Technology has an important role to play in helping to protect the most vulnerable in communities. It allows for the faster identification of offenders which improves the quality of investigations. This results in victims seeing the perpetrators of crime brought to justice in a timelier fashion which frees up resources to allow further understanding and increased responding to the needs of the community.

Purpose:



The primary purpose of LFR is to enhance security and public safety by:

- A) Identifying suspects or persons of interest quickly.
- B) Supporting targeted policing operations and major public events.

Algorithm Specific Information and Mitigation that supports the general equality duty of the BTP

National Institute of Standards and Technology (NIST) Face Recognition Vendor Test (FRVT) Part 3

[Access Here](#)

The National Institute of Standards and Technology (NIST) was founded in 1901 and is now part of the U.S. Department of Commerce.

This is the third in a series of reports on ongoing face recognition vendor tests (FRVT) executed by NIST). In relation to these reports, the NIST Test report published in 2018 evaluated over 200 algorithms for their accuracy. Its findings state that:

“NEC, which had produced broadly the most accurate algorithms in 2010, 2013, submitted algorithms that are substantially more accurate than their June 2018 versions and on many measures are now the most accurate”.

In March 2017, NIST also published a Face in Video Evaluation (FIVE) report.² Unlike the other NIST Tests, the FIVE test involved the use of video footage as opposed to static images. This is of particular interest because this aligns more closely to the use of facial recognition in a ‘live’ - video context.

The NEC algorithm was found to be the most accurate across the different measures with a True Positive Identification rate of 82% at a corresponding False Positive Identification Rate of 0.4%.

In 2019, NIST published the first study to assess whether demographics such as gender or ethnicity cause FR Identification system accuracy to vary.³ Tests were run on a 2.6 million image dataset where images were balanced with respect to representation of gender and ethnicity. The NIST results demonstrate that not all algorithms show uniform accuracy levels across the different demographics. However, NEC, the vendor used by the BTP was found to perform well, with NIST saying that NEC had: “provided an algorithm



for which the false positive differential was undetectable” and the NEC-3 algorithm “is on many measures, the most accurate [NIST] have evaluated”.

In April 2025 NEC published that its face recognition technology was ranked the world’s most accurate in the most recent benchmark test conducted by the globally recognized U.S. National Institute of Standards and Technology (NIST). The latest Face Recognition Technology Evaluation (FRTE) 1:N Identification report indicates that NEC’s system received the highest performance rating, with an authentication error rate of 0.07%, in the "1:N Identification" test using still images of 12 million people. In addition, it also ranked first in two aging tests using images taken more than 10 and 12 years ago and was ranked in the top two in all eight major FRTE 1:N Identification categories listed on the NIST website.

[Face Technology Evaluations - FRTE/FATE | NIST](#)

Equitability Testing

British Transport Police (BTP) has carefully considered issues regarding bias and algorithmic injustice in both selection of a supplier to provide Live Facial Recognition Technology (LFRT) and within the Policy document.

When considering the algorithm and software used for Live Facial Recognition (LFR), there was no observed disproportionally across any particular ethnic group with regards to the generation of false alerts. BTP are currently using the NEC Neoface V4 algorithm for use with LFRT further to analysis of the NEC algorithm findings of The National Institute of Standards and Technology (NIST) with regards the NEC_4 algorithm; with a third party being sourced to undertake a Demographic Differential Evaluation covering age, ethnicity and gender on behalf of South Wales Police and The Metropolitan Police who use the same software. The research has been undertaken by the National Physics Laboratory (NPL) (published April 2023) entitled ‘Facial Recognition Technology in Law Enforcement: Equitability Study’. This research is referred to as the NPL Equitability Study.

The NPL Equitability Study is available via the link: [Access Here](#)

The study considered it reasonable to define the scope to focus only on age, ethnicity and gender and not all the adversely impacted protected characteristics because it would be virtually impossible to have a



Live Facial Recognition – Op Overwatch Equality Impact Assessment

proportion of representatives from, for example, people with facial disfigurement across different ethnic backgrounds, age and gender. The research reviewed and considered: To respond to the uncertainty around potential biases in the FRT algorithm used by BTP, the evaluation has been designed to:

- Robustly and independently test the NEC Neoface M40 algorithm by conducting a series of experimental research ‘trials’ for each of the different operational applications in which it utilised by the Police service.
- Assess the outcomes of the trials, including what, if any, differentials exist and under which operational conditions.
- Establish an evidence base specific to the NEC Neoface M40 algorithm to be used by BTP (henceforth ‘the algorithm’).

In doing so, the evaluation will answer four key research questions about the algorithm:

1. Does the algorithm display an ethnicity differential in reading and matching faces? If so, how?
2. Does the algorithm display a gender differential in reading and matching faces? If so, how?
3. Does the algorithm display an age differential in reading and matching faces? If so how?
4. Do Ethnicity, gender and age interact to create and/or worsen any inherent biases within the algorithm?

The responses to be above questions are:

1. Does the algorithm display an ethnicity differential in reading and matching faces? If so, how?

The NPL findings show that with Threshold settings of 0.6 and above, the false positive identification rate and the true positive identification rate between the ethnicities were equitable. Below 0.6, equitability will depend on settings of the operational Deployment, including size and composition of the watchlist, and the number of crowd subjects passing through the zone of recognition during the Deployment. The



Live Facial Recognition – Op Overwatch Equality Impact Assessment

recommendation of the NPL is that 0.6 be the minimum Threshold utilised to minimise false positive alerts and any adverse impact on equitability

2. Does the algorithm display a gender differential in reading and matching faces? If so, how?

At a Threshold setting of 0.6 and above, the false positive identification rate and true positive identification rate were positive between the genders tested. Below 0.6, equitability will depend on settings of the operational Deployment, including size and composition of the watchlist, and the number of crowd subjects passing through the zone of recognition during the Deployment. The recommendation of the NPL is that 0.6 be the minimum Threshold utilised to minimise false positive alerts and any adverse impact on equitability.

3. Does the algorithm display an age differential in reading and matching faces? If so, how?

At a Threshold setting of 0.6 and above, the false positive identification rate was equitable between all age groups tested. The true positive identification rate for persons under 20 was determined to be lower than the other age groups however it is believed that environmental factors may have also influenced this, including crowd density and height of the subjects being sought for identification. The recommendation here is that at a Threshold of 0.6, a small number of false positive identifications were created however the balance was not statistically significant. Authorising Officers should consider the potential crowd density and number of persons included in the watchlist below the age of 20 when considering the agreed minimum Threshold to maximise the true positive identification rates, whilst considering crowd density and minimising false positive identifications amongst all demographic groups.



4. Do ethnicity, gender and age interact to create and/ or worsen any inherent biases in the algorithm?

At a Threshold setting of 0.6, the highest performing true positive identification rate was that of Asian females. The lowest performing true positive identification rate was that of Black females. When considering gender and ethnicity together across the entire test cohort, the differences were not statistically significant across any group or sub-group.

The software that BTP has selected to use during the Live Facial Recognition pilot has been deemed one of the best performing algorithms internationally and the best available through the Blue Light Framework in terms of accuracy in a variety of uses.

The above independent testing gives BTP practical evidence to make decisions upon the use of live facial recognition technology, the policy dictates that the threshold setting for use by the algorithm is 0.64 this is above that at which the independent testing found that the results were equitable (0.60), this has been a decision that shows that BTP is willing not just to meet the minimum requirements but to exceed them to ensure that the use of this technology is ethical and non-discriminatory.

The policy document specifically addresses and includes additional safeguards for those groups deemed most at risk of being impacted by the use of this technology by ensuring there is an individual assessment of any child being added to the watchlist, and legal advice and assessment of any child under 13 years of age, those subject to a relevant disability and those undergoing Gender Reassignment before they can be added to a watchlist

Watchlist considerations

BTP takes reasonable steps to ensure that the use of LFR and compilation Watchlists does not disproportionately impact any individual or group, this includes specific considerations relevant to the images held by BTP for use in LFR deployments;

1. Must only contain Images that BTP are reasonably satisfied that the images are held lawfully
2. Must only use images where all reasonable steps have been taken to ensure the image is of a person intended for inclusion in the Watchlist database.



Live Facial Recognition – Op Overwatch Equality Impact Assessment

Watchlists are bespoke for every deployment based on its location and type of deployment, the inclusion on a watchlist must be justified and intrinsically linked to the purpose of the deployment.

Watchlists are drawn from data held by BTP and draws the most recent lawfully held image of a suspect for inclusion on a watchlist this limits any potential misidentification that could occur through aging or other changes in appearance.


4. Groups and Individuals:

- **What individuals, groups or organisations have been engaged to help with the equality analysis?**
- **What potential impact has been identified as a result of any evidence gathering and engagement and show which groups the impact applies to.**
- **Were changes made at this stage as a result of this evidence gathering/engagement?**
- **If there is still a potential impact following any changes, please state what further changes if any could be made to eradicate or reduce this impact.**
- **If changes are possible, please outline how these will be made and when. If no changes are possible, please say why.**

Group	Action	Timeline	Response
BTP Youth Independent Advisory Group			
BTP Independent Advisory Group	<p>1 -Concern raised about bias against certain minority groups has reported to be present in facial recognition technology.</p> <p>2-Concern raised about networking of camera systems and privacy concerns- of Police Information (MOPI) and the Data Protection Act (DPA).</p>	12/11/25	<p>1-Answered with research document from NEC and Digital barriers from NPL and NIST testing of algorithm.</p> <p>2- LFR camera and server is a standalone system and is not networked or connected to any outside system, all data processed is immediately deleted by the system unless a match is detected and this is kept for 28 days in</p>



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			line with the Management of Police Information (MOPI) and the Data Protection Act (DPA).
BTP SAME	SAME representative -question is around the accountability and ethical use of LFR - we need an assurance that the process is robust, and any data compiled from those people stopped is properly shared for transparency and governance	From internal departmental and functional stakeholder meeting 21/10/25	Each deployment of LFR will be supported by an intelligence case which will be reviewed by an authorising officer at least the rank of Superintendent who will ensure it is proportionate, and necessary, only data retained will be when the system identifies a potential match in line with MOPI to allow positive identifications to be retained for 28 days and for false positive identifications to be analysed to improve the system performance and in line with Police conduct regulations. Results of LFR operations will be published on the BTP LFR webpage after each deployment.
BTP Christian Police association	No Concerns raised	21/10/25	
BTP Jewish Police association	No Concerns raised	21/10/25	



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Association of Muslim Police (BTP)	No Concerns raised	21/10/25	
TSSA Transport Salaried staff Association	No Concerns raised	21/10/25	
Female Police association	No Concerns raised	21/10/25	
Hindu Police association	No Concerns raised	21/10/25	
Sikh Police association	No Concerns raised	21/10/25	
Gypsy Roma Traveller Police Association	No Concerns raised	21/10/25	
The Rainbow Network	No Concerns raised	21/10/25	
The Disability Association	No Concerns raised	21/10/25	
SEEN (Sex Equality and Equity Network).	No Concerns raised	21/10/25	



BRAIN Neurodiversity.	No Concerns raised	21/10/25	
External			
Independent Advisory groups	<p>Considered the impact of this technology on both ethnic groups and Sex raised concerns about possible bias within the algorithm.</p> <p>Concerns also raised about the potential use of images of unknown suspects which had been included in the policy document.</p>	08/12/25	<p>Confirmed the finding of the National Physical Laboratory testing that was undertaken on the algorithm being used, this was completed both in laboratory conditions and in Live deployments with other police forces which showed the setting levels that achieved public sector equality duty and also recommended settings that eliminated false positive alerts being generated during testing.</p> <p>ftr-equitability-study_mar2023.pdf</p> <p>Unknown suspects inclusion on watchlist would be only in extremely limited circumstances where the threat to public safety was considered so serious that any impact on individuals by wrongful matching by the algorithm would be assessed as proportionate</p>



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			by a senior officer and in line with the services duty to protect the public, there were numerous safeguards including assessment of the lawfulness of the image, the quality of the image being sufficient to be used by the algorithm without introducing a high risk of mis-matching as well as a proportionality test to be completed before any inclusion in a watchlist. As this was a new additional to the policy legal advice is being sought to ensure that this is compatible with legislation and the safeguards are sufficient to protect the public sector equality duty.
Transport focus	No Concerns	23rvffffffvaz/01/26	
London Travel Watch	No concerns raised	23/01/26	
Network rail	Discussions took place during site visits at London Bridge about the alternate routes, advised that under guidance that NWR operate to any deviation of more than 50	21/01/26	Policy considers this point and will allow an area of non-compliance that is not onerously impactful on the public, the Senior Responsible officer has requested that these routes are recorded on video and photographed.



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	meters requires the provision of rest stops, this was already considered in the operational plan for London Bridge but may be relevant at other sites when assessing suitability.		
Transport for London	No Concerns raised	01/11/25- Ongoing	
Govia Thameslink railway	No concerns raised.	01/11/25-Ongoing	
RMT (Rail and Maritime Union)	No concerns raised.	01/11/25-Ongoing	
UNITE	No concerns raised.	01/11/25-Ongoing	



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5. If you have indicated a potential impact but believe that this can be justified, what is the justification? Have you taken advice when making this decision and if so, from whom? ☒

Although several potential impacts have been identified throughout this assessment, these are considered justified based on extensive independent evidence and the substantial mitigations embedded within BTP's operational approach. Independent evaluations conducted by the National Institute of Standards and Technology (NIST) and the National Physical Laboratory (NPL) found the NEC algorithm to perform equitably across demographic groups when used at recommended threshold settings, and BTP has exceeded these recommendations by operating at a higher threshold to further reduce the risk of false positives. Mitigations implemented by BTP include: **requiring Gold Commander authorisation** before placing children, individuals undergoing gender reassignment, or persons with certain disabilities on a watchlist; **active system monitoring** by operators with the authority of Bronze and Silver Commanders to halt deployments if concerns arise; **site-specific accessibility assessments** to ensure that alternative routes for those wishing to avoid the Zone of Recognition remain navigable for individuals with mobility impairments; **high-visibility signage and equipment** designed to support those with visual impairments; and **prohibitions on deployment locations** that could unjustifiably affect people travelling to education, worship, or protest. Additionally, the policy includes strict proportionality, and legality checks before any person is added to a watchlist, and the inclusion of unknown suspects is subject to senior-officer scrutiny and legal advice to ensure compliance with equality and data protection duties. Engagement with Independent Advisory Groups, internal staff networks, and legal advisors has informed these safeguards, ensuring concerns around bias, privacy, accountability, and system fairness have been addressed. Taken together, the independent evidence base, strong governance framework, and robust mitigations provide clear justification for proceeding despite the limited and carefully managed residual impacts.

Where mitigation options are limited due to the operational environment of railway stations—such as the inability to provide audible alerts for visually impaired individuals—introducing additional measures may create greater adverse effects than the existing impact. For example, using Network Rail's public address systems to announce an LFR deployment could suggest that the entire station is subject to LFR rather than a defined area, potentially deterring visually impaired passengers from using the station altogether. We are conscious that station wide Tannoy announcements advising the public of LFR operations may give rise to apprehension the entire station is under surveillance or add confusion as to what area the defined zone of recognition covers. We will discuss on a location by location basis, with station operators, whether we can utilise public messaging Tannoy systems to inform members of the public (especially our blind community) that an LFR deployment is underway.

The policy recognises the inherent difficulty in providing a meaningful route of non-consent for individuals who do not wish their biometric data to be processed. Accordingly, no Zone of Recognition will be positioned in a manner that restricts access to, or exit from, train services. An alternative route will always be made available, and this must not involve an unreasonable diversion nor disadvantage individuals with mobility needs. Guidance from Network Rail—particularly the requirements set out within the Accessible Travel Policy [Network Rail Accessible Travel Policy](#)—has been incorporated into operational planning and will continue to inform deployment decisions taken by operational commanders.

It is acknowledged that some LFR deployments may occur at locations that also function as international ports. Individuals whose first language is not English, or who are unable to understand written English, may therefore enter an area where LFR is in use. As the pilot programme is limited to London and the South East, there is no legal requirement to provide signage in languages other than English. While this may mean certain individuals cannot give fully informed consent prior to entering a Zone of Recognition,

providing multilingual signage would be impractical due to the physical space required. Excessive signage could obscure the primary safety messaging, restrict crowd flow, or create congestion on busy station concourses. QR codes are included on all posters, providing access to the BTP website, and individuals may use the translation features on smart devices; however, it is accepted that not all individuals will have the means or awareness to do so.

LFR deployments are temporary in nature and therefore will not be permanently present at international transport hubs. As a result, any impact on non-English speakers will occur only during short deployment windows. While this may affect a small number of individuals, the mitigations required to address this fully would carry greater risks to passenger movement, station safety, and accessibility—particularly for those with mobility or visual impairments—due to the volume of additional signage that would be required. Should LFR be deployed at St Pancras International, it will not be positioned outside the international arrivals or departures areas. Instead, deployments will take place within the domestic rail section of the station, where the likelihood of identifying relevant subjects is higher and where equitable access for international travellers can be maintained.

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

This policy will be reviewed by the LFR Business Owner and LFR Operational Lead throughout the six-month pilot to ensure its suitability and to address any issues identified during the deployment of this technology. At the conclusion of the pilot period, the policy will undergo a comprehensive review prior to any further rollout within the organisation.

The BTP Director of Intelligence represents BTP at the National Facial Recognition Board, which convenes monthly. In addition, through liaison with the LFR force lead, the business lead will maintain awareness of any developments or changes that may impact the LFR policy.

All Public Authorities such as the British Transport Police (BTP) have to comply with section 149 of the Equality Act 2010 more commonly known as the General Duty.

The Duty requires BTP 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 BTP, the way we evidence this is by completing EIAs.

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

SRO:	C. Casey
Rank / Grade	Chief Superintendent
Date:	10/02/26

Appendix B – COAP Combined Operational Authority Pack

Part 1 – Application to be completed by applicant					
LFR URN :					
Relevant Period					
Section 1 (A): Applicant					
Name:				Rank:	
Police Number:			Department:		
Section 1 (B): LFR Use Case					
Hotspot	Crime:	Y <input type="checkbox"/> N <input type="checkbox"/>	PSO:	CNI:	Y <input type="checkbox"/> N <input type="checkbox"/>
	Missing Person:	Y <input type="checkbox"/> N <input type="checkbox"/>	Specific Intelligence:	Event:	Y <input type="checkbox"/> N <input type="checkbox"/>
Not in use during pilot phase					
Section 1 (C): Intelligence Case					
Crime data and/or intelligence reporting and/or operational experience summary:					
Section 1 (D): ‘Why’ Objectives, Legitimate Aim & Legal Basis					
Objectives:					
<ul style="list-style-type: none"> • Use LFR technology to enable BTP to discharge its Common Law Policing Powers. This includes the need to tackle our foremost operational priorities to ensure the safety of those using the railway network. • Adopt a robust and proportionate approach in engaging and pursuing individuals identified on an LFR watchlist, using human decision-making. Officer oversight is active and involved, with the officer retaining full control and making the decision on whether to act. • Safeguard, engage and reassure our communities, listening and responding to concerns. • Continually identify and review risks relevant to the LFR technology, mitigate those risks and maintain a response plan should mitigation fail • Bring offenders to justice • Manage serious offenders • Investigate serious crime 					
Legitimate Aim:					
Note: Select all that apply to the proposed Deployment of LFR. Those selected must be responsive to the use case(s) selected for LFR. Should it become necessary to seek a different legitimate aim to those listed below.					
<input type="checkbox"/>	Protect national security.	<input type="checkbox"/>	Ensure public safety.	<input type="checkbox"/>	Prevent disorder and/or crime.
Data Protection: Law Enforcement Purpose:					
<input checked="" type="checkbox"/>	Prevention, investigation. Detection or prosecution of criminal offences.	<input type="checkbox"/>	Execution of criminal penalties.	<input type="checkbox"/>	Safeguarding against, and prevention of, threats to public security.
Legal Basis:					
<input type="checkbox"/>	Protect life and security.	<input type="checkbox"/>	Preserve order and threats to public security.	<input type="checkbox"/>	Prevent and detect crime.

<input type="checkbox"/>	Bring offenders to justice.	<input type="checkbox"/>	Uphold National security.
Section 1 (E): 'Where' – Proposed Location(s)			
Location(s):	<p>Note: Response to comply with BTP LFR Policy and to include (i) location(s) proposed, (ii) how the location will help achieve the recognised policing objectives by reference to the intelligence case.</p> <p>Confirm if site visit has been conducted or is planned and any diagram to define operational area within the location/s (where Possible)</p>		
Section 1 (F) 'When' – Proposed Dates and Times			
Location,	Date	Time	
From:			
To:			
Location	Date of deployment or deployment period (dd/mm/yy)	Time (hhmm)	
From:			
To:			
Location,	Date of deployment or deployment period (dd/mm/yy)	Time (hhmm)	
From:			
To:			
Location	Date of deployment or deployment period (dd/mm/yy)	Time (hhmm)	
From:			
To:			
Location,	Date of deployment or deployment period (dd/mm/yy)	Time (hhmm)	
From:			
To:			
Location	Date of deployment or deployment period (dd/mm/yy)	Time (hhmm)	
From:			
To:			
Location,	Date of deployment or deployment period (dd/mm/yy)	Time (hhmm)	
From:			
To:			
Location	Date of deployment or deployment period (dd/mm/yy)	Time (hhmm)	

From:				
To:				
Standard safeguards for a Deployment Period longer than 24 hours (as applicable): <ul style="list-style-type: none"> • Watchlist to be re-uploaded each day to ensure currency • Intel case to be reconfirmed as current each day and logged as such by Bronze. • Gold to be consulted each day to ensure they are satisfied that the basis to Deploy continues to be made out. Bronze to log Gold's authority with any further safeguards/restrictions 				
Additional safeguards (by exception): <ul style="list-style-type: none"> • 				
Section 1 (G) 'Who' – Watchlist specific confirmations				
Note: The inclusion of Sought Persons on any particular watchlist is responsive to the particular use case and must be compiled in accordance with the BTP LFR Policy.				
Relevant Offence Types Cat A – Serious Offences Cat B – Victim Based Offences Cat C – Most Other Offences (Aggravated by Domestic Violence or Violence against Women & Girls) Watchlist specific confirmations must fall under above 'relevant offences types' above.	Theft and kindred offences	<input type="checkbox"/> Y <input type="checkbox"/> N	Terrorism offences	<input type="checkbox"/> Y <input type="checkbox"/> N
	Sexual offences	<input type="checkbox"/> Y <input type="checkbox"/> N	Fraud and dishonesty offences	<input type="checkbox"/> Y <input type="checkbox"/> N
	Violent offences	<input type="checkbox"/> Y <input type="checkbox"/> N	Damage to property offences	<input type="checkbox"/> Y <input type="checkbox"/> N
	Drug offences	<input type="checkbox"/> Y <input type="checkbox"/> N	Modern slavery, kidnap, human trafficking, and kindred offences	<input type="checkbox"/> Y <input type="checkbox"/> N
	Firearms and weapons offences	<input type="checkbox"/> Y <input type="checkbox"/> N		
	Stalking and kindred offences	<input type="checkbox"/> Y <input type="checkbox"/> N		
PSO: (as applicable)	Confirmation of which recordable offences are of a type giving rise to a threat to public safety:			
	<ul style="list-style-type: none"> • 			
	Confirmation in relation the type of court orders and/or banning orders in relation to domestic or international travel infrastructure:			
	<ul style="list-style-type: none"> • 			
Confirmation as to whether a Deployment location is one where it is lawful to undertake an examination under Schedule 7 of the Terrorism Act 2000 / Schedule 3 of the Counter-Terrorism and Border Security Act 2019 (Y/N):			<input type="checkbox"/> Yes <input type="checkbox"/> No	
Specific Intelligence (as applicable)	Confirmation of the names of persons to be added to the LFT Watchlist and which category/categories they fall within under the BTP LFR Policy:			
	<ul style="list-style-type: none"> • 			
Section 1 (H): Watchlist image confirmations				
Watchlist Privacy Considerations	Confirmation as to the image Level(s) (see Annex G) to be used for watchlist construction.	<input type="checkbox"/> Level 1 <input type="checkbox"/> Level 2	<input type="checkbox"/> Level 3	<input type="checkbox"/> Level 4 <input type="checkbox"/> Level 5
	If the image levels 3, 4 or 5 are proposed for use, confirmation as to the source of such images must be provided – Only custody images will be used for the purposes of the pilot. In exceptional circumstances a level 3, 4 or 5 image can be considered in WAD Part 3 (C) Policy Appendix V1.5 161225.docx			

Algorithm thresholds: The SRO's direction for the use of LFR is to observe a minimum 1:1000 False Alert Rate.		Having considered the Equality Impact Assessment, and BTP's Facial Recognition Technology: Understanding Accuracy and Demographic Difference document, the minimum threshold to use is:		0.64	
Section 1 (I): Deployment-specific equalities impact assessment considerations					
Watchlist composition:		Specific safeguards relating to protected characteristics and Watchlist composition:			
Under 18-years-old	<input type="checkbox"/> Yes <input type="checkbox"/> No	Rationale:	Relevant Disability¹	<input type="checkbox"/> Yes <input type="checkbox"/> No Rationale (with support advice attached):	
Under 13-years-old	<input type="checkbox"/> Yes <input type="checkbox"/> No	Rationale (with support advice attached):	Gender transition	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	<input type="checkbox"/> Legal Advice <input type="checkbox"/> LFR Advice			<input type="checkbox"/> Legal Advice <input type="checkbox"/> LFR Advice	
Equalities/Protected Characteristics consideration:	Specific protected characteristics considerations arising at proposed Deployment location: This may include the demographic make-up of residents around the location of the deployment, but due to the nature of the railway network we accept that the demographic of the public using the station may be vastly different to that of residents.		•		
	Are any mitigations proposed to reduce the impact identified?		•		
	Do the answers above, or the Threshold proposed for use mean that, notwithstanding the mitigations outlined, the Deployment is expected to have a particular impact on those with a protected characteristic beyond that already identified in the BTP LFR Equalities Impact Assessment?		<input type="checkbox"/> Yes	<input type="checkbox"/> No Rationale:	
	Confirmation that the Watchlist composition will be provided to Gold:		<input type="checkbox"/> Yes – Name of person to action: <input type="checkbox"/> No		
Section 1 (J): Deployment-specific analysis					
Article 8 consideration:					
Article 9 consideration:					
Article 10 consideration:					
Article 11 consideration:					
Article 14 consideration:					
Section 1 (K): Proportionality					

¹ A relevant disability in this context means those with a disability (as the term is defined in section 6(1) of the Equality Act 2010) and that such a disability may impact on the performance of the police force's LFR system. Examples which may have an impact (depending on the performance characteristics of the specific LFR system) include if the subject has suffered a facial injury, undergone facial surgery, has a degree of facial trauma or is of a particular bearing which inhibits their facial features from being recognised.

Non LFR Alternatives:	Could other less intrusive policing methods be used without unacceptably compromising the achievement of the relevant policing objectives	<input type="checkbox"/> Yes – Do not proceed. <input type="checkbox"/> No
	Rationale:	
LFR Alternatives	How is the proposed Deployment of LFR designed so as to avoid undue interference with the rights and freedoms of members of the public?	
	Note: Consider whether LFT could be deployed elsewhere, with fewer cameras, for a shorter duration, or avoiding areas of elevated privacy to make it less intrusive without unacceptably compromising the achievement of the relevant objective.	
Planned awareness raising measures:		

Part 2 – Written Authority Document (WAD)	
LFR URN:	
Section 2 (A): Urgency	
Urgency: If LFRAO is below rank of Superintendent (minimum of Inspector), please detail how the urgency criteria applies.	
Section 2 (B): Compliance with LFR Documents	
I have considered this application and am satisfied that the proposed Deployment complies with the BTP LFR policy documents.	<input type="checkbox"/> Yes <input type="checkbox"/> No – Application to be declined.
Section 2 (C): Use Case, Legitimate Aim & Objectives	
I am satisfied with the propose use case, legitimate aim and objectives for the proposed Deployment and legal basis intelligence case underpinning it.	<input type="checkbox"/> Yes <input type="checkbox"/> No – application to be declined.
Rationale:	
Having reviewed the Section 1 (C) in relation to crime types and the underpinning crime data/or BTP intelligence reporting and/or operational experience summary and authorise the offence types proposed.	<input type="checkbox"/> Yes <input type="checkbox"/> No – application to be declined <input type="checkbox"/> N/A
Section 2 (D): Watchlist image confirmations	
I authorise the Watchlist composition. I am satisfied that all reasonable steps have been taken to ensure that the composition of the Watchlist complies with BTP LFR Policy.	<input type="checkbox"/> Yes <input type="checkbox"/> No – application to be declined
I authorise the use of Watchlist images at Level 3, Level 4 or Level 5 in line with BTP LFR Policy.	<input type="checkbox"/> Yes – Level 3 <input type="checkbox"/> Yes – Level 4 <input type="checkbox"/> Yes – Level 5 <input type="checkbox"/> No – application to be declined <input type="checkbox"/> N/A
Section 2 (E): Deployment-specific equalities impact assessment considerations	
I direct Gold to review Watchlist composition in relation to (i) sex (ii) race and (iii) age r age when this data is available to them when the Watchlist is produced within the 24 hour period prior to Deployment. Gold is empowered to cease the Deployment should they not consider the Deployment to be objectively justified. A record of their consideration must be recorded in the log for the Deployment.	
Specific considerations relating to the Watchlist for approval:	
a. Under 18 years-old	<input type="checkbox"/> Approved <input type="checkbox"/> Images must not be used
b. Under 13 years-old	<input type="checkbox"/> Approved <input type="checkbox"/> Images must not be used
c. Relevant Disability ²	<input type="checkbox"/> Approved

² A relevant disability in this context means those with a disability (as the term is defined in section 6(1) of the Equality Act 2010) and that such a disability may impact on the performance of the police force’s LFR system. Examples which may have an impact (depending on the

		<input type="checkbox"/> Images must not be used
d. Gender transition		<input type="checkbox"/> Approved <input type="checkbox"/> Images must not be used
Protected Characteristics Considerations	Where Section 1[I] has concluded that notwithstanding the mitigations outlined, the Deployment is expected to have a particular impact on those with a protected characteristic beyond that already identified in the BTP LFR Equalities Impact Assessment, I am satisfied that the expected benefits from the use of LFR mean that the impact is objectively justified in the circumstances.	<input type="checkbox"/> Yes <input type="checkbox"/> No – Application to be declined.
Rationale:		
Section 2 (F): Proportionality		
Part 1: I have considered any impact on convention rights set out in the applicable impact assessments and deployment specific considerations set out in Section 1 (J) above. I am further satisfied that the Deployment of LFR will achieve one or more policing objectives as confirmed at Section 2 (D) above.		
Part 2: I have reviewed Section 1 (K) of the Application Subject to the adoption of any further control specified below, I am satisfied that the relevant policing objectives cannot be effectively achieved though the use of less intrusive policing methods.		<input type="checkbox"/> Yes <input type="checkbox"/> No – Application to be declined.
Further controls:		
Part 3: I am satisfied that the Deployment of LFR strikes a fair balance between any interference with the rights of freedoms of those affected by the deployment of LFR and the achievement of the relevant policing objectives.		
Rationale:		<input type="checkbox"/> Yes <input type="checkbox"/> No – Application to be declined.
<ul style="list-style-type: none"> • The degree to which the Deployment will enable policing objectives: • The degree to which the Deployment supports fundamental rights and freedoms • How LFT compares to any non-LFR alternatives • The degree to which the Deployment would interfere with fundamental rights and freedoms • Consideration as to the ‘fair balance’: 		
Section 2 (G): Authorisation		
I direct that all Police Officers engaged in the deployment of the LFR technology must have received LFR training, officers deployed to support the operation must be briefed by the Bronze commander immediately prior to the deployment.		
Please summarise any guidance and direction received from the Data Protection Officer (DPO) for this deployment.		
<i>Information: The roles of the DPO is an important part of the process in the pre-Deployment planning stage of any LFR Deployment. Their advice is crucial to ensuring that any proposals meet the requirements of the DPA 2018. As well as providing advice, the DPO is able to monitor compliance with the DPA 2018, and in doing so provides assurance to the Chief Constable.</i>		
I hereby grant authority for LFR to be Deployed at the location(s), dates and times set out in the Application or as otherwise confirmed below.		<input type="checkbox"/> Yes <input type="checkbox"/> No – Deployment must not proceed
Name:		Rank:

performance characteristics of the specific LFR system) include if the subject has suffered a facial injury, undergone facial surgery, has a degree of facial trauma or is of a particular bearing which inhibits their facial features from being recognised.

Police Number:		Department:	
Date (dd/mm/yy):		Time (hhmm):	

Part 3 – Gold Commander Watchlist

LFR URN:	
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Section 3 (A): Watchlist image confirmations

I authorise the Watchlist composition. I am satisfied that all reasonable steps have been taken to ensure that the composition of the Watchlist complies with BTP LFR Policy.	<input type="checkbox"/> Yes <input type="checkbox"/> No – application to be declined
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Section 3 (B) : Deployment-specific equalities impact assessment considerations

I have reviewed Watchlist composition in relation to (i) sex (ii) race and (iii) age range
 The Watchlist has been produced within the 24-hour period prior to Deployment.

Specific considerations relating to the Watchlist for approval:

Under 18 years-old	<input type="checkbox"/> Included <input type="checkbox"/> N/A
Under 13 years-old	<input type="checkbox"/> Included <input type="checkbox"/> N/A <input type="checkbox"/> Legal Review Obtained and approved for inclusion
Relevant Disability ³	<input type="checkbox"/> Included <input type="checkbox"/> N/A <input type="checkbox"/> Legal Review Obtained and approved for inclusion
Gender transition	<input type="checkbox"/> Included <input type="checkbox"/> N/A <input type="checkbox"/> Legal Review Obtained and approved for inclusion

Where Section 3 (b) has concluded that an individual included on the watchlist falls under one of the protected characteristics an assessment must be completed that supports their inclusion on the watchlist.

Subject details: Rationale for decision:	<input type="checkbox"/> Yes <input type="checkbox"/> No – Exclude from Watchlist.
Subject details: Rationale for decision:	<input type="checkbox"/> Yes <input type="checkbox"/> No – Exclude from Watchlist.
Subject details: Rationale for decision:	<input type="checkbox"/> Yes <input type="checkbox"/> No – Exclude from Watchlist.
Subject details: Rationale for decision:	<input type="checkbox"/> Yes <input type="checkbox"/> No – Exclude from Watchlist.
Subject details: Rationale for decision:	<input type="checkbox"/> Yes <input type="checkbox"/> No – Exclude from Watchlist.

Section 3 (C) Critical addition *Exceptional Circumstances only*

³ A relevant disability in this context means those with a disability (as the term is defined in section 6(1) of the Equality Act 2010) and that such a disability may impact on the performance of the police force’s LFR system. Examples which may have an impact (depending on the performance characteristics of the specific LFR system) include if the subject has suffered a facial injury, undergone facial surgery, has a degree of facial trauma or is of a particular bearing which inhibits their facial features from being recognised.

Policy 9.2.1 - In exceptional circumstances where conditions outlined in 5.2.4 are met, a **CCTV image of a suspect** may be included on the Live Facial Recognition (LFR) watchlist as the probe image. This inclusion must be authorised by the Gold Commander for the LFR operation and supported by a documented assessment demonstrating that the use of the image is lawful, necessary, and proportionate to prevent serious harm. The decision must consider the expected level of privacy intrusion (rated on a scale of 1–5 as outlined in policy appendix G) and include a clear justification of the imminence of the threat and why alternative measures are insufficient.

Consideration must be given to establish whether the quality of CCTV probe image is of sufficient quality to provide a facial match. This must be balanced with the urgency of identifying the suspect against any deterioration in the algorithm’s performance due to the poorer quality of probe image and increase in potential false positives that may occur.

Exceptional Circumstances

Policy 5.2.4 - An imminent threat to life or an imminent threat of serious harm to people or property and/or an intelligence/investigative opportunity with limited time to act with a seriousness and benefit of which supports the urgency of the action.

Describe the immediacy of the threat below;	<input type="checkbox"/> Yes -threshold met <input type="checkbox"/> No – Exclude from Watchlist.
What confirmation is there that the image is of a suspect linked to the above threat and how the image was legally obtained below;	Source of the image <input type="checkbox"/> CCTV <input type="checkbox"/> Member of Public <input type="checkbox"/> Social Media <input type="checkbox"/> Police <input type="checkbox"/> Other please state;
Confirmation as to the image Level(s) (see Policy Appendix G) to be used for watchlist construction	<input type="checkbox"/> Level one <input type="checkbox"/> Level two <input type="checkbox"/> Level three <input type="checkbox"/> Level four <input type="checkbox"/> Level five
Image Quality- What advice has been provided about the quality of the image from a member of the Live Facial Recognition team;	Is Image of sufficient quality to enable feature extraction <input type="checkbox"/> Yes <input type="checkbox"/> No – Exclude from Watchlist.
Outline Necessity / Proportionality (This must be balanced with the urgency of identifying the suspect against any deterioration in the algorithms performance due to the poorer quality of probe image and increase in potential false positives that may occur.) Confirm what considerations about impact on Human Rights and Equality this addition may have and any safeguards implemented.	Rationale:

Is the threshold for a critical addition met		<input type="checkbox"/> Yes <input type="checkbox"/> No – Exclude from Watchlist.	
Name:		Rank:	
Police Number:		Department:	
Date (dd/mm/yy):		Time (hhmm):	
Section 3 (D) Authorisation			
I have reviewed the authorisation and rationale for a deployment of LFR tactics, I am satisfied that the deployment remains objectively justified.		<input type="checkbox"/> Yes <input type="checkbox"/> No – Deployment must not proceed	
Rationale:			
I hereby approve the watchlist for use in the deployment at:		<input type="checkbox"/> Yes <input type="checkbox"/> No – Deployment must not proceed	
Name:		Rank:	
Police Number:		Department:	
Date (dd/mm/yy):		Time (hhmm):	

Part 4 – Cancellation Report			
LFT URN			
Date (dd/mm/yy):			
Section 4 (A): Person Completing Cancellation Report			
Name:		Rank:	
Police Number:		Department:	
Section 4 (B): Record of Deployment Location & Times			
Details of when LFR was employed, to include locations (maps/photos of camera locations, field of view and signage locations) dates and times of use, a link to the LFT log(s):			
•			
Was any aspect of the Deployment of LFR outside the authority given by the AO:		<input type="checkbox"/> Yes <input type="checkbox"/> No	
•			
Section 34(D): Commentary Notes			
Description of outcomes:			
•			
Descriptions of outcomes from persons engaged not as a result of an Alert:			
•			
Section 4 (D): Commentary Notes			
Please outline any relevant commentary or notable occurrences relating to the Deployment of LFR:			
•			
Please detail any learning or recommendations for subsequent Deployment of LFR:			
•			

Appendix C – Additional Safeguards – Protected Characteristics.

	Under 18	Under 13	Disability	Gender Reassignment
Circumstances				
	LFR is used to locate a person under 18 and that person’s records state that person is aged (or suspected to be aged) under 18-years-old	LFR is used to locate a person under 18 and that person’s records state that person is aged (or suspected to be aged) under 13-years-old ⁴	LFR is to be used to locate a person and that person’s records state that person has (or is suspected to have) a relevant disability ⁵	LFR is to be used to locate a person and that person’s records state that person has (or is suspected to have) (i) undertaken a gender reassignment and (ii) it is believed or suspected to be that the Watchlist would be using an image of that person taken prior to their reassignment
Safeguards				
Necessity	Specific regard needs to be had for the importance of locating the subject on a risk-based approach in line with this policy with a particular focus on ensuring the necessity case is fully made out.			
Watchlist Images	N/A	There is a particular need to ensure that the image is a current as possible and of a suitable quality for inclusion on the Watchlist.		
Legal Advice		Specific advice must be sought from Legal Services and the BTP LFR team prior to any seeking authorisation from an AO. Where authorisation is then sought, this advice needs to be provided to the AO to help inform their decision making and allow the AO to record their decision regarding any inclusion on the Watchlist and outline further safeguards that should apply.		
Technical Advice	Regard should also be had to consider System and Subject Factors and the ability for the LFR system to generate an accurate Alert against the image proposed for inclusion on the Watchlist.			
	Consideration should be given to the likely crowd flow / occlusion risk where shorter subjects may otherwise be blocked from the camera’s line of sight.	Technical advice should be sought on a case-by-case basis to inform this assessment. Where authorisation is then sought, this advice needs to be provided to the AO to help inform their decision making and allow the AO to record their decision regarding any inclusion on the Watchlist and outline further safeguards that should apply.		

⁴ Generally, studies *Face Recognition Vendor Test (FRVT)* have shown that young 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 FPIR). The higher FPIR may lead to more False Alerts being generated against young children if there is an image of a young person in the Watchlist.

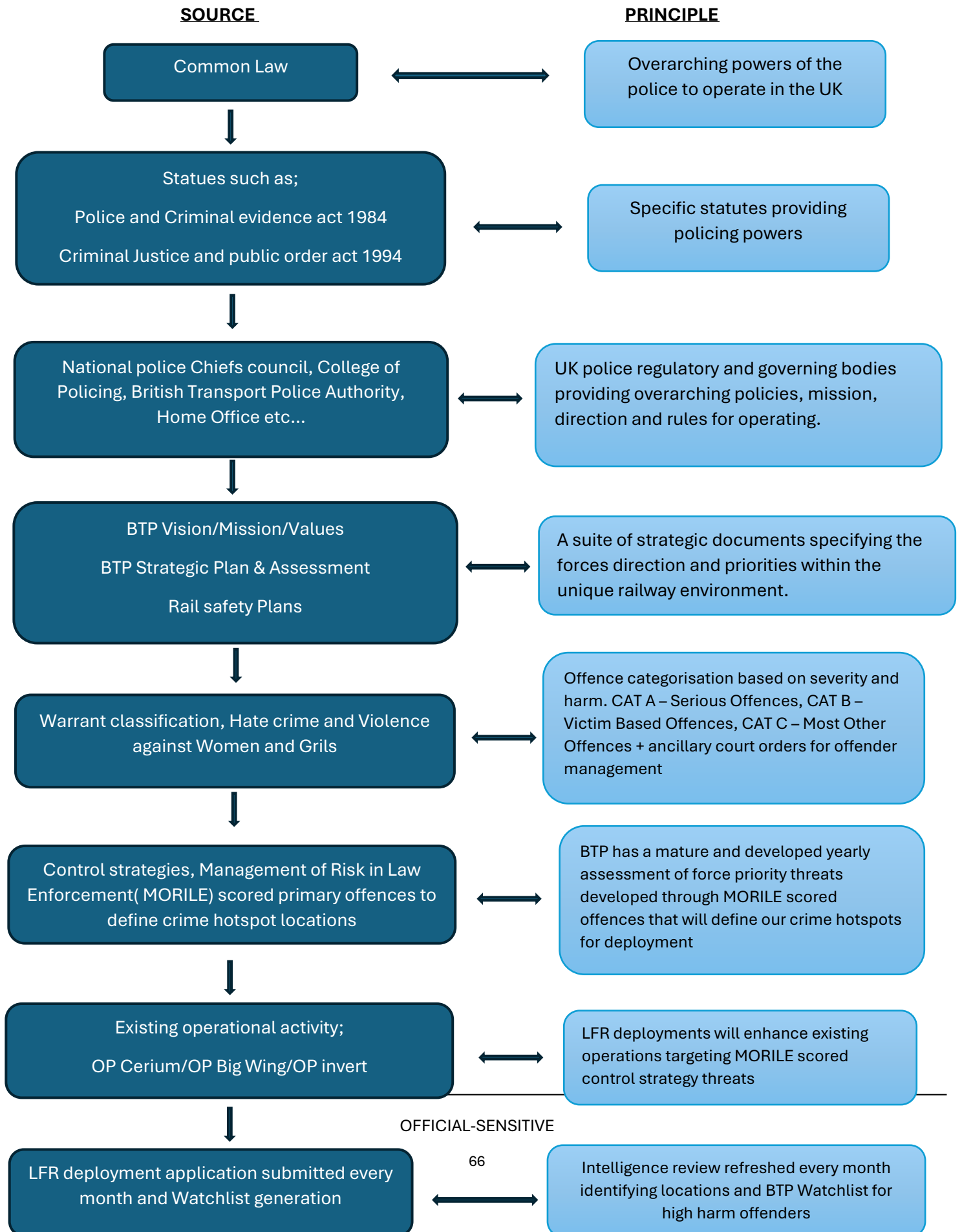
⁵ A relevant disability in this context means those with a disability (as the term is defined in section 6(1) of the Equality Act 2010) and that such a disability may impact on the performance of the police force’s LFR system. Examples which may have an impact (depending on the performance characteristics of the specific LFR system) include if the subject has suffered a facial injury, undergone facial surgery, has a degree of facial trauma or is of a particular bearing which inhibits their facial features from being recognised.

Appendix D – Legal Framework

	Level 1	Level 2	Level 3	Level 4
<p>This area reflects that biometric and other personal data is processed by the LFR system. It reflects the application of the Data Protection Act 2018 (under GDPR/ Part III, as applicable) and underlying documents that govern and reflect this.</p> <p>Oversight: Information Commissioner's Office</p>	Data Protection Act 2018	ICO codes and guidance	Force policy documents	Records of decisions/ assessments of risk - DPIA
<p>This area reflects the relevance of human rights to the use of LFR. Some, like the right to privacy, will be engaged by those on the LFR watchlist and/or passing the LFR system. The engagement of other rights will be context dependant.</p> <p>Oversight: Equalities and Human Rights Commission</p>	Human Rights Act 1998 Article 8, 9, 10, 11, 14 and Osman	Bridges v South Wales Police 2020	Force policy documents	Records of decisions
<p>This area reflects the relevance of equality considerations and the application of the Public Sector Equality Duty. It shows the underlying documents which also govern and show compliance with this duty.</p> <p>Oversight: Equalities and Human Rights Commission</p>	Equality Act 2010 PSED	Bridges v South Wales Police 2020	Force policy Documents	Records of decisions
<p>This area reflects the potential application of the Regulation of Investigatory Powers Act 2000. For an overt capability, it is important to have regard to RIPA to ensure the use of the LRF does not become directed surveillance.</p> <p>Oversight: Investigatory Powers Commissioner's Office</p>	Regulation of Investigatory Powers Act 2000	Regulation of Investigatory Powers Act Code of Practice	Force policy documents	Records of decisions
<p>This area reflects that LFR uses CCTV cameras to film those passing through the zone of recognition as part of the wider LFR system. It recognises the relevance of the Protection of Freedoms Act 2012 to CCTV in public spaces by policing in England and Wales.</p> <p>Oversight: Surveillance camera commissioner</p>	Protection of Freedoms Act 2012 Primary legislation	Surveillance camera code of practice Secondary legislative instruments	Force policy documents SCC self-assessment checklist	<p>This level of documentation reflects the use of the legal framework in practice - ensuring relevant decisions, including the rationale, necessity and proportionality for use is recorded. It is also the place where decisions of relevance to the Public Sector Equality Duty should be recorded.</p>
<p>Legal basis: Statutory (eg, S.64A PACE) case law and policing common law powers</p> <p>This is the legal basis for the action - ie, the legal power(s) that supports the compilation of the watchlist and the use of the LFR.</p>				
<p>Ethics, APP guidance and scrutiny Oversight: PCCs</p> <p>The dashed line shows that there are a number of aspects to the lawful and ethical use of LFR systems that are all encompassing and do not just relate to one area of law.</p>				
<p>Primary legislation This level of the legal framework reflects a statutory legislation enacted by Parliament that combines in its application to provide a framework for the regulation of LFR.</p> <p>Secondary legislative instruments This level of the legal framework reflects statutory codes, non-statutory guidance typically issued at national level that chief officers should have regard to when seeking to apply the Level 1 legal framework, and relevant case law. Authorised Professional Practice (APP) issued by the College of Policing also sits at this level within the legal framework. However, given some APP is not specific to a particular area of primary legislation, it is reflected as an overarching consideration in the legal schematic to reflect it's pervasive application.</p> <p>Force Policy This reflects policy document issues at a force level. They provide for the operational implementation of the legal framework in a way that helps the use of LFR to be both accessible and foreseeable to the public.</p>				

Appendix E – Intelligence Framework & Case

Legal & Intelligence framework | **clear, accessible, and foreseeable**



OFFICIAL-SENSITIVE

Appendix F – Surveillance Camera Code – Compliance Summary

Principle	How BTP Policy Addresses It
1. Specified purpose, legitimate aim, pressing need	LFR Policy – “Strategic Intention, Objectives and Use Case” (pp. 6–11) Legal Mandate – Introduction & Use Cases (1.1–1.3) DPIA Stage 1 – Section 1.1 Purpose & Use Cases
2. Consider privacy impact, regular reviews	DPIA Stage 1 – Whole document (risk, necessity, mitigations) DPIA Stage 2 – Section 2 (principles & compliance) LFR Policy – Governance, Oversight & Assessment (pp. 18–21) EIA – Full equality risk/impact review
3. Transparency and public access	LFR Policy – Public Engagement (pp. 24–26) APD (GDPR) – Transparency measures & signage (“Principle (a) Lawfulness, Fairness, Transparency”) Legal Mandate – Transparency duties under Article 8
4. Clear responsibility and accountability	LFR Policy – Command structure (LFRAO, Gold, Silver, Bronze) (pp. 11–18) APD (DPA Part 3) – Accountability principle DPIA Stage 2 – Governance and responsibilities]
5. Clear rules, policies, and procedures communicated	LFR Policy – Entire document (policy, procedures, criteria) Legal Mandate – Tier 3 “BTP LFR Documents” (Policy, SOPs, DPIA, APD, EIA) APDs – GDPR & DPA Part 3 (processing rules)
6. Limit retention and delete promptly	LFR Policy – Data Retention (pp. 21–23) APD (GDPR) – Storage Limitation section (“Principle (e) Storage Limitation”) APD (Part 3) – Storage Limitation (“Principle (5)”) DPIA Stage 1 – 1.13 Review, Retention, Disposal
7. Restricted access and defined rules	LFR Policy – System Security & Operator Roles (pp. 11–18 + Data Security section) APD (GDPR) – Integrity & Confidentiality (Principle (f)) APD (Part 3) – Integrity & Confidentiality (Principle 6)

8. Meet operational and technical standards	LFR Policy – Camera standards, placement & system calibration (pp. 35–36) Legal Mandate – NIST / NPL algorithm accuracy evidence EIA – Equitability / performance findings
9. Appropriate security measures	LFR Policy – Data Security (encrypted USB, standalone system) pp. 21–23 APD (GDPR & Part 3) – Security controls DPIA Stage 2 – Security measures under “Integrity & Confidentiality” [
10. Review, audit, and publish reports	LFR Policy – Governance & Oversight (pre, during, post-deployment) pp. 18–21 Legal Mandate – Governance & Performance reporting (Section 10–11) APDs – Accountability principle
11. Effective use to support public safety and evidential value	LFR Policy – Purpose, Operational Objectives, Engagement Rules pp. 6–11, 11–18 Legal Mandate – Common Law Policing Purpose (protect life, prevent crime) DPIA Stage 1 – Use cases & policing benefit rationale
12. Accuracy and currency of reference database	LFR Policy – Watchlist Considerations (pp. 26–35) DPIA Stage 1 – Accuracy requirement, 24-hour watchlist creation APD (GDPR & Part 3) – Principle (d) Accuracy Legal Mandate – WHO criteria for lawful watchlist composition

Appendix G- Watchlist Imagery Privacy Considerations

British Transport Police have adopted the following approach to ensure a balance is struck between the requirements for an image to be included, against individual expectations of privacy. Where there is doubt as to the Level to be adopted, a cautious approach should be adopted which favours greater safeguards and approval requirements.

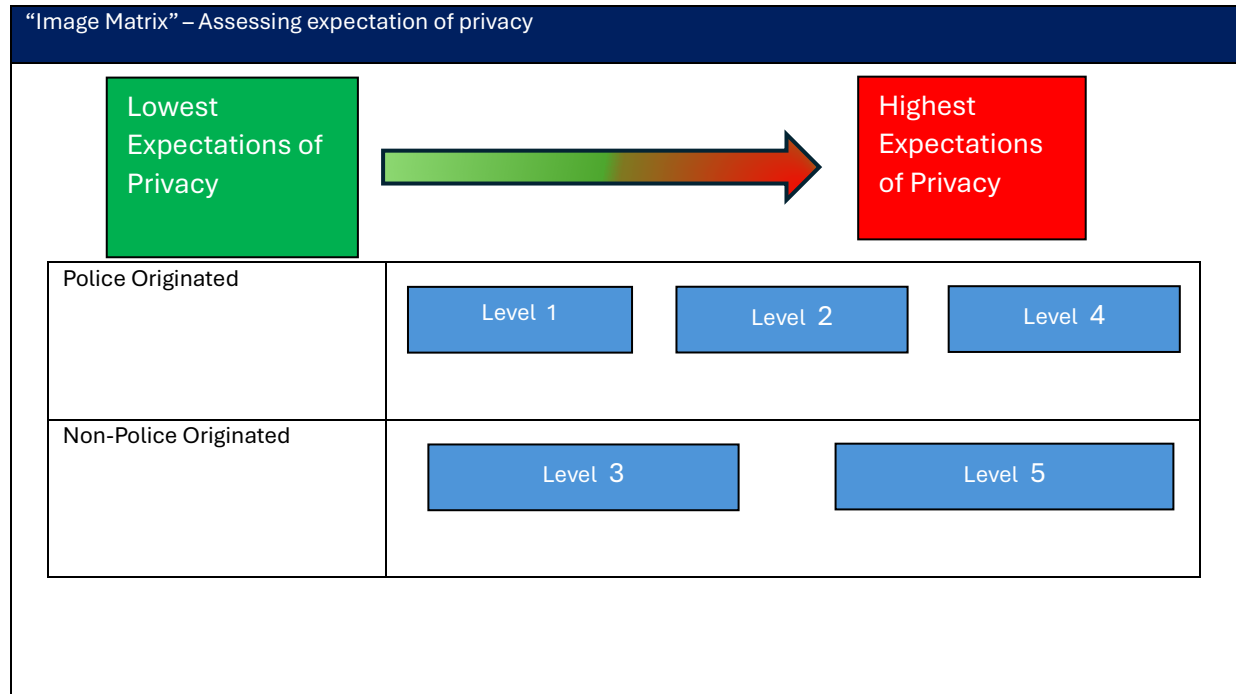


Image Level	Description	Examples
Level 1	<p>Police Images Obtained:</p> <ul style="list-style-type: none"> In compliant circumstances where reasonable steps have been taken to ensure the subject was aware that their image was taken; or The subject of the image was deceased. 	<ul style="list-style-type: none"> An image taken of a compliant subject in the custody environment. A parent consents to provide their missing child’s image to officers to assist with investigations. Police Body Warn Video footage or a similar facial image gathered overtly from a mobile device during an interaction with policing where the Sought-Person is compliant with policing.
Level 2	<p>Police-originated images obtained in non-compliant circumstances where reasonable steps have been taken to ensure the Sought-Person was nevertheless aware that their image / images of the public are being taken.</p>	<ul style="list-style-type: none"> An image taken of a non-compliant subject in the custody environment. Police controlled overt CCTV. Police Body Warn Video footage gathered during an interaction with policing where the Sought-Person is non-compliant with policing (for example they were non-cooperative or passed through the footage).
Level 3	<p>Non-police originated Images where it is assessed that the public would expect the law</p>	<ul style="list-style-type: none"> Imagery provided following appeals to the public.

	<p>enforcement to have access to them (but not including images obtained by covert means.)</p>	<ul style="list-style-type: none"> • The unresolved crime Cache (when activated). • Local authority or other third party controlled overt CCTV (including CCTV from security cameras in domestic settings). • Publicly available/open-source information, for example and including information supplied by an employer. • Information shared by other public bodies e.g. under Section 21 (Supply of information by the Secretary of State) of the Immigration and Asylum Act 1999.
<p>Level 4</p>	<p>Images where it is assessed that they:</p> <ul style="list-style-type: none"> • Raise elevated privacy expectations; • Raise wider human rights issues; and or • Where the images were otherwise obtained covertly without the knowledge of the subject but where the ability of the police to obtain such images can be anticipated by reference to published Codes of Practice. 	<ul style="list-style-type: none"> • Imagery obtained pursuant to Section 64A of the Police and Criminal Evidence Act 1984 (until such point as the subject has been taken where such action is required by PACE Code D); • Imagery obtained via the Regulation of Investigatory Powers Act 2016. • Images which are more sensitive because there were taken in at hospitals, places of worship, centres of legal advice, polling stations, schools (and other places particularly frequented by children), care homes or feature persons at a lawful assembly.
<p>Level 5</p>	<p>Non-police originated images in circumstances where it is assessed that the public would not typically expect their image to be shared to, or accessible by the police at the point they provided it but there is nevertheless a lawful basis for the police to hold the imagery it was received.</p>	<ul style="list-style-type: none"> • Where the public have shared their image with a controller of data for an explicit purpose and it was not in their contemplation at the time of sharing their image that it may be used for any law enforcement purpose. This maybe particularly relevant with businesses who promote their privacy-lead approach and take active steps to prevent any form of third-party access.

Appendix H – Offence Categories Index

The below table illustrates particular crimes and the categories to which they are assigned. It also gives a total number of specific crime types in each category. These are used in determining the seriousness of the offence. For example, if a suspect is wanted for any one of the 119 Cat A offences they can be included on a watchlist subject to conditions outlined in the legal mandate and Policy.

	Description	Crime Assessment	Current Number of offence types in this category
High	Serious Offences	Mandatory CAT A	119
Medium	Victim Based Offences	Priority CAT B	208
Low	Most Other Offences	Non-Priority CAT C	173 Only if aggravated by violence against women and girls or domestic violence.

Crime Code Description	Crime Screening Level
Any domestic offence	Mandatory CAT A
Offences with vulnerable victims (BTP Definition only)	Mandatory CAT A
Murder	Mandatory CAT A
Attempt Murder	Mandatory CAT A
Manslaughter	Mandatory CAT A
Intentional Destruction Of A Viable Unborn Child	Mandatory CAT A
Road Traffic - Causing Death By Dangerous Driving	Mandatory CAT A
Soliciting To Commit Murder & Conspiracy To Commit Murder	Mandatory CAT A
Infanticide	Mandatory CAT A
Road Traffic - Cause Death By Aggravated Vehicle Taking	Mandatory CAT A
Road Traffic - Causing Death By Careless Driving When Under The Influence Of Drink Or Drugs	Mandatory CAT A
Corporate Manslaughter	Mandatory CAT A
Causing Or Allowing The Death Of A Child Or Vulnerable Person	Mandatory CAT A
Road Traffic - Causing Death By Careless Or Inconsiderate Driving	Mandatory CAT A
Causing Death By Driving, Unlicensed, Disqualified Or Uninsured Drivers	Mandatory CAT A
Assault - Grievous Bodily Harm With Intent	Mandatory CAT A
Assault - Grievous Bodily Harm Without Intent	Mandatory CAT A
Threats To Kill	Mandatory CAT A
Attempting To Choke Etc. In Order To Commit Indictable Offence	Mandatory CAT A
Using Chloroform Etc. To Commit Indictable Offence	Mandatory CAT A
Causing injury (by explosion)	Mandatory CAT A
GBH with intent (by explosive substance/corrosive fluids)	Mandatory CAT A
Placing Explosives In Or Near Buildings With Intent To Do Bodily Harm	Mandatory CAT A
Administer poison (endanger life)	Mandatory CAT A
Administering Poison With Intent To Injure Or Annoy	Mandatory CAT A
Abandoning Child Under Two Years	Mandatory CAT A
Child Abduction	Mandatory CAT A

Administering Drugs Or Using Instruments To Procure Abortion	Mandatory CAT A
Procuring Drugs Etc. To Cause Abortion	Mandatory CAT A
Concealment Of Birth	Mandatory CAT A
False Imprisonment	Mandatory CAT A
Aid, Abet, Council Or Procure Suicide	Mandatory CAT A
Cruelty To Or Neglect Of Children	Mandatory CAT A
Chemical Weapon offences (production)	Mandatory CAT A
Chemical Weapons offences (use)	Mandatory CAT A
Noxious substances (use, threat or harm)	Mandatory CAT A
Torture	Mandatory CAT A
Aiding an offender (murder offences)	Mandatory CAT A
Malicious wounding	Mandatory CAT A
Modern Slavery	Mandatory CAT A
Forced Marriage Offences	Mandatory CAT A
Malicious Wounding: wounding or inflicting grievous bodily harm on a constable (Police Officer or PCSO)	Mandatory CAT A
Cause GBH with intent to resist/prevent arrest (Police Officer or PCSO)	Mandatory CAT A
Wounding with intent to resist/prevent arrest (Police Officer or PCSO)	Mandatory CAT A
Wounding with intent to do grievous bodily harm (Police Officer or PCSO)	Mandatory CAT A
Female Genital Mutilation (E/W only)	Mandatory CAT A
Assault or assault by beating of an emergency worker (except a constable)	Mandatory CAT A
Engage in controlling/ coercive behaviour in an intimate/family relationship’.	Mandatory CAT A
Using Firearm To Resist Arrest	Mandatory CAT A
Firearms - Possess Firearm Or Imitation Firearm With Intent To Cause Fear Of Violence	Mandatory CAT A
Firearms (serious other offences)	Mandatory CAT A
Explosives - Possession with Intent to endanger life	Mandatory CAT A
Firearms - Possess firearm with Intent to endanger life or cause serious injury to property	Mandatory CAT A
Firearms - Possess Shotgun Or Imitation (With Intent)	Mandatory CAT A
Firearms - Possess Airgun Or Imitation (With Intent)	Mandatory CAT A
Firearms - Use Firearm To Resist Arrest	Mandatory CAT A
Firearms - Use Shotgun To Resist Arrest	Mandatory CAT A
Firearms - Use Air Weapon To Resist Arrest	Mandatory CAT A
Firearms - Possess Firearm (While Committing Or Being Arrested For Offence)	Mandatory CAT A
Firearms - Possess Shotgun (While Committing Or Being Arrested For Offence)	Mandatory CAT A
Firearms - Possess Air weapon (While Committing Or Being Arrested For Offence)	Mandatory CAT A
Firearms - Possess Firearm Or Imitation Firearm With Intent To Commit Indictable Offence Or To Resist Arrest Or Prevent The Arrest Of Another	Mandatory CAT A
Firearms - Possess Shotgun With Intent To Commit Indictable Offence	Mandatory CAT A
Firearms - Possess Air Weapon With Intent To Commit Indictable Offence	Mandatory CAT A
Firearms - Possess Purchase Acquire Or Distribute Any Prohibited Weapon Or	Mandatory CAT A

Ammunition	
Rape Of A Female	Mandatory CAT A
Indecent Assault (Men)	Mandatory CAT A
Indecent Assault (Women)	Mandatory CAT A
Indecency With Children / Lewd And Libidinous Practices	Mandatory CAT A
Indecent Exposure Insult Female	Mandatory CAT A
Unlawful Sexual Intercourse Under 13	Mandatory CAT A
Unlawful Sexual Intercourse Under 16	Mandatory CAT A
Procure Female	Mandatory CAT A
Abducting Girl Under 18 Or Mentally Disordered Woman For Sex	Mandatory CAT A
Kidnapping	Mandatory CAT A
Other Sex Offence	Mandatory CAT A
Assault With Intent To Rape	Mandatory CAT A
Sexual Offences - Committing An Act Outraging Public Decency	Mandatory CAT A
Sexual Assault On A Male Child Under 13 No Penetration	Mandatory CAT A
Rape Of A Female Aged 16 And Over	Mandatory CAT A
Rape Of A Female Child Under 16	Mandatory CAT A
Rape Of A Female Child Under 13	Mandatory CAT A
Rape Of A Male Aged 16 And Over	Mandatory CAT A
Rape Of A Male Child Under 16	Mandatory CAT A
Rape Of A Male Child Under 13	Mandatory CAT A
Sexual Assault On A Female Child Under 13 No Penetration	Mandatory CAT A
Causing Or Inciting S A Child Under 13 To Engage In Sexual Activity	Mandatory CAT A
Causing A Female Person To Engage In Sexual Activity No Consent Penetration	Mandatory CAT A
Causing Or Inciting S A Child Under 16 To Engage In Sexual Activity	Mandatory CAT A
Familial Sexual Offences (Incest)	Mandatory CAT A
Exploitation Of Prostitution (Causing Or Incites Activities Of A Prostitute For Gain)	Mandatory CAT A
Sexual Activity With A Person With A Mental Disorder	Mandatory CAT A
Abuse Of Children Through Prostitution & Pornography	Mandatory CAT A
Trafficking Into The UK For Sexual Exploitation	Mandatory CAT A
Abuse Of Trust - A Person Aged 18 Or Over In A Position Of Trust	Mandatory CAT A
Sexual Grooming – Female	Mandatory CAT A
Administering A Substance With Intent To Commit A Sexual Offence	Mandatory CAT A
Persistently Soliciting A Person For Prostitution From A Motor Vehicle	Mandatory CAT A
Sex Offenders - Breach Of Sex Offenders Order	Mandatory CAT A
Sex Offenders - Fail To Notify Police Name/Address Or Gives False Information	Mandatory CAT A
Sexual Assault On A Male Aged 13 And Over By Penetration	Mandatory CAT A
Sexual Assault On A Male Child Under 13 By Penetration	Mandatory CAT A
Assault On A Female Aged Over 13 By Penetration	Mandatory CAT A
Assault On A Female Aged Under 13 By Penetration	Mandatory CAT A

Causing A Male Person To Engage In Sexual Activity By Penetration (No Consent)	Mandatory CAT A
Causing A Female Person To Engage In Sexual Activity No Penetration (No Consent)	Mandatory CAT A
Causing A Male Person To Engage In Sexual Activity No Penetration (No Consent)	Mandatory CAT A
Sexual Grooming – Male	Mandatory CAT A
Commit An Offence With Intent To Commit A Sexual Offence	Mandatory CAT A
Trespass With Intent To Commit A Sexual Offence	Mandatory CAT A
Voyeurism	Mandatory CAT A
Persistently Soliciting A Person For Prostitution (Not Vehicle)	Mandatory CAT A
Take Or To Make Indecent Photographs Or Pseudo-Photographs, Of Children	Mandatory CAT A
Possession Of An Indecent Or Pseudo-Photograph Of A Child	Mandatory CAT A
Trafficking Within The UK For Sexual Exploitation	Mandatory CAT A
Trafficking Out Of The Uk For Sexual Exploitation	Mandatory CAT A
Possession Of Extreme Pornographic Images (Bestiality)	Mandatory CAT A
Possession Of Extreme Pornographic Images (Likely To Result In Injury)	Mandatory CAT A
Possession Of Extreme Pornographic Images (Threatens A Persons Life)	Mandatory CAT A
Sexual Activity With An Animal - Male	Mandatory CAT A
Soliciting (Obtaining Sexual Services As A Prostitute In A Street/Public Place)	Mandatory CAT A
Exploit Person To Provide Sex Services For Another After Payment Promised	Mandatory CAT A
Trafficking For Sexual Exploitation Intentionally Arrange/Facilitate The Arrival/Entry Into The UK/Another Country	Mandatory CAT A
Trafficking For Sexual Exploitation (Arrange/Facilitate Travel Of A Person)	Mandatory CAT A
Trafficking For Sexual Exploitation (Arrange/Facilitate a person's departure)	Mandatory CAT A
Sexual Activity Involving A Child Under 13	Mandatory CAT A
Engage in sexual communication with a child	Mandatory CAT A
Upskirting	Mandatory CAT A
Reported rape incident – Victim or third party has not confirmed or not traced	Mandatory CAT A
Reported rape incident – Credible evidence to the contrary	Mandatory CAT A
Reported rape incident – Offence in another force area	Mandatory CAT A
Reported Rape Incident– used at recording stage if it cannot be confirmed whether it is E96, E97, E98	Mandatory CAT A
Robbery (Personal Property)	Mandatory CAT A
Assault With Intent To Rob (Business Property)	Mandatory CAT A
Robbery (Business Property)	Mandatory CAT A
Assault With Intent to Rob (Business Property)	Mandatory CAT A
Aggravated Burglary In A Dwelling	Mandatory CAT A
Aggravated burglary other than a dwelling	Mandatory CAT A
Railways - Highjacking Destroying Or Damaging Channel Tunnel Train Or System	Mandatory CAT A
Blackmail	Mandatory CAT A
Abuse Of Position	Mandatory CAT A

Railways - Destroying, Damaging Etc. A Channel Tunnel Train Or The Tunnel System Or Committing Acts Of Violence Likely To Endanger Safety Of Operation	Mandatory CAT A
Destroy/Damage Property With Intent To Endanger Life	Mandatory CAT A
Arson Endangering Life	Mandatory CAT A
Malicious Obstruction With Intent	Mandatory CAT A
Bribery & Corruption	Mandatory CAT A
Perjury Witness	Mandatory CAT A
Attempts To Pervert The Course Of Justice	Mandatory CAT A
False Statement Perjury	Mandatory CAT A
Criminal Libel	Mandatory CAT A
Intimidation/Threats/Harm/Injure Witness, Juror Or Person Assisting In The Investigation	Mandatory CAT A
Public Order – Riot	Mandatory CAT A
Public Order - Violent Disorder	Mandatory CAT A
Public Order - Harassment - Fear Or Provocation Of Violence	Mandatory CAT A
Public Order - Harassment - Breach Of Conditions Of Injunction Against Harassment	Mandatory CAT A
Public Order - Harassment - No Violence	Mandatory CAT A
Public Order- Harassment - Breach Of Restraining Order	Mandatory CAT A
Stalking Involving Fear Of Violence	Mandatory CAT A
Stalking Involving Serious Alarm/Distress	Mandatory CAT A
Stalking Pursue A Course Of Conduct That Amounts To Stalking	Mandatory CAT A
Breach Of A Marriage Protection Order	Mandatory CAT A
Breach of Stalking Order/Interim Stalking Order	Mandatory CAT A
Unlawful Import/Export Class A Drugs	Mandatory CAT A
Unlawful Import/Export Class B Drugs	Mandatory CAT A
Unlawful Import/Export Class C Drugs	Mandatory CAT A
Unlawful Import/Export Class Unspecified Drugs	Mandatory CAT A
Racially Or Religiously Aggravated GBH	Mandatory CAT A
Racially Or Religiously Aggravated - ABH	Mandatory CAT A
Racially Aggravated - Common Assault With No Injury	Mandatory CAT A
Racially Or Religiously Aggravated Malicious Wounding	Mandatory CAT A
Racially or Religiously aggravated Harrassement with fear of violence	Mandatory CAT A
Threaten With An Offensive Weapon In A Public Place	Mandatory CAT A
Threaten With A Blade Or Sharply Pointed Article In A Public Place	Mandatory CAT A
Sexual Offences - Committing An Act Outraging Public Decency	Mandatory CAT A
Drunk In Charge Of A Child Under 7 Years	Mandatory CAT A
Firearms - Drunk In Charge Of A Firearm	Mandatory CAT A
Assault - Assault Occasioning Actual Bodily Harm	Priority CAT B
Assault - Assault Occasioning Actual Bodily Harm	Priority CAT B
Assault - Assault With Intent To Resist Arrest	Priority CAT B
Drivers Injuring Persons By Furious Driving	Priority CAT B

Owner Or Person In Charge Allowing Dog To Be Dangerously Out Of Control	Priority CAT B
Assault occasioning actual bodily harm on a constable (Police Officer or PCSO)	Priority CAT B
Disclose private sexual photographs or films with intent to cause distress	Priority CAT B
Sending letters etc. with intent to cause anxiety	Priority CAT B
Sexual Assault On A Male Aged 13 And Over No Penetration	Priority CAT B
Sexual Assault On A Female Aged 13 And Over No Penetration	Priority CAT B
Exposure	Priority CAT B
Sexual Activity In A Public Lavatory	Priority CAT B
Burglary Dwelling	Priority CAT B
Burglary Booking Office	Priority CAT B
Burglary Parcel Office	Priority CAT B
Burglary General Office	Priority CAT B
Burglary Warehouse	Priority CAT B
Burglary Goods Shed	Priority CAT B
Burglary Workshop	Priority CAT B
Burglary Stores	Priority CAT B
Burglary Kiosks/Shops	Priority CAT B
Burglary Cabins	Priority CAT B
Burglary Tenants	Priority CAT B
Burglary Refreshment Rooms	Priority CAT B
Burglary Garages	Priority CAT B
Burglary Other Premises	Priority CAT B
Enter Premises By Violence	Priority CAT B
Going Equipped (For Burglary Or To Steal)	Priority CAT B
Interfere With A Motor Vehicle	Priority CAT B
Theft – Mail	Priority CAT B
Theft - Goods In Transit	Priority CAT B
Theft - Luggage	Priority CAT B
Theft - Personal Property	Priority CAT B
Theft - From Person (inc. snatch theft)	Priority CAT B
Theft - By Employee	Priority CAT B
Theft - Of Undertakings Cash By Public	Priority CAT B
Theft - From Vending Machines	Priority CAT B
Theft - Undertakings Stores	Priority CAT B
Theft - Goods In Transit (Containers/Vehicles)	Priority CAT B
Theft - From Motor Vehicle	Priority CAT B
Theft - Of Motor Vehicle	Priority CAT B
Theft – Miscellaneous	Priority CAT B
Theft - Pedal Cycle	Priority CAT B
Theft - Take Motor Vehicle Without Owners Consent Or Being Carried In It	Priority CAT B
Theft - Handling/Receiving Stolen Goods	Priority CAT B

Violation Of Mail	Priority CAT B
Theft In Dwelling	Priority CAT B
Theft - Abstract Electricity	Priority CAT B
Theft - By Shoplifting - Property Value Over £200	Priority CAT B
Theft - Remove Articles From Public Display	Priority CAT B
Theft - Assist In The Handling/Retention Of Stolen Property	Priority CAT B
Theft - Aggravated Vehicle Taking	Priority CAT B
Theft - From Cycle	Priority CAT B
Theft - From Buffet Trolley	Priority CAT B
Theft - Of Plant	Priority CAT B
Theft Of Cable Live	Priority CAT B
Theft Of Metal Non Live	Priority CAT B
Concealing Or Disguising Criminal Property	Priority CAT B
Facilitates Acquisition, Retention, Use Or Control Of Criminal Property, By Or On Behalf Of Another Person.	Priority CAT B
Acquisition, Use And Possession Committed When A Person Acquires, Possesses Or Uses Criminal Property	Priority CAT B
Fraud	Priority CAT B
False Accounting	Priority CAT B
Serious Travel Fraud Offences	Priority CAT B
False Statement By Co Director	Priority CAT B
Other Fraud By Co Director	Priority CAT B
Obtain Pecuniary Advantage	Priority CAT B
Fraudulently retaining/secreting (mail)	Priority CAT B
Destroy/Deface/Suppression Of Documents	Priority CAT B
Procure Execution Documents	Priority CAT B
Evasion Of Liability	Priority CAT B
Make Off Without Payment	Priority CAT B
Other Frauds	Priority CAT B
Conspiracy To Defraud	Priority CAT B
Modification,Interception & Disclosure Of Messages	Priority CAT B
Obtaining Property By Cheque Or Credit Card Fraud	Priority CAT B
Obtaining Property By Deception (Apart From Cheque And Credit Card Fraud)	Priority CAT B
Obtain Services By Cheque And Credit Card Fraud	Priority CAT B
Obtain Sevices By Deception (Apart From Cheque And Credit Card Fraud)	Priority CAT B
Making For Sale Or Hire Or Possess Or Distribute Articles Which Infringe Copyright	Priority CAT B
Fraudulent Trading	Priority CAT B
False Representation Apart From Cheque And Credit Card Fraud	Priority CAT B
False Representation Cheque And Credit Card Fraud Only	Priority CAT B
Possession Of Articles For Use In Fraud - Apart From Cheque And Credit Card Fraud	Priority CAT B
Possession Of Articles For Use In Fraud- Cheque And Credit Card Fraud Only	Priority CAT B

Making Or Supply Articles- Apart From Cheque And Credit Card Fraud	Priority CAT B
Making Or Supply Articles - Cheque And Credit Card Fraud Only	Priority CAT B
Obtaining Services Dishonestly Apart From Cheque And Credit Card Fraud	Priority CAT B
Obtaining Services Dishonestly Travel Frauds Notifiable Only	Priority CAT B
Obtaining Services Dishonestly Cheque And Credit Card Fraud Only	Priority CAT B
With Intent Knowingly Possess False / Improperly Obtained Anothers Id	Priority CAT B
With Intent Make / Possess / Control Apparatus / Material For Making False Id Cards	Priority CAT B
Possess / Control A False / Improperly Obtained Id Card Or Document / Apparatus For Making	Priority CAT B
Unauthorised Access To Computer Material With Intent To Commit Or Facilitate Commission Of Further Offences	Priority CAT B
Unauthorised Modification Of Computer Material	Priority CAT B
Possess / Control Identity Documents With Intent	Priority CAT B
Make / Possess / Control Apparatus / Article / Material Designed / Adapted For Making False Identity Documents	Priority CAT B
Possess / Control A False / Improperly Obtained / Another Persons Identity Document	Priority CAT B
Railways - Endangering Railway Passengers By Placing Anything On Railway	Priority CAT B
Railways - Endangering Railway Passengers By Unlawful Acts, Or By Omission Or Neglect	Priority CAT B
Road Traffic - Causing Danger To Road Users	Priority CAT B
Offences Under Health And Safety Regulations	Priority CAT B
Direct or shine a laser beam towards a person controlling a vehicle	Priority CAT B
Malicious Obstruction	Priority CAT B
Damage Build/Works - Damage over £300	Priority CAT B
Damage Rolling Stock - Damage over £300	Priority CAT B
Damage S&T Equipment - Damage over £300	Priority CAT B
Damage Tenants Property - Damage over £300	Priority CAT B
Damage Other - Damage over £300	Priority CAT B
Threat To Destroy/Damage Property	Priority CAT B
Possess Items With Intent Destroy/Damage Property	Priority CAT B
Arson Buildings/Works	Priority CAT B
Arson Rolling Stock	Priority CAT B
Damage To Motor Vehicle	Priority CAT B
Arson Other	Priority CAT B
Endangering Railway Passengers By Throwing Anything At Railway Carriages Etc.	Priority CAT B
Graffiti	Priority CAT B
Criminal Damage Pedal Cycle	Priority CAT B
Graffiti Murals	Priority CAT B
Graffiti Etching	Priority CAT B
Forgery	Priority CAT B
Forgery - Copying False Instrument	Priority CAT B

Forgery - Using False Instrument	Priority CAT B
Forgery - Reproduce British Bank Note & Coins No Intent	Priority CAT B
Forgery - Possess False Instrument Or Materials To Make	Priority CAT B
Forgery - Currency Offence Tender Counterfeit Currency As Genuine	Priority CAT B
Forgery – Prescription	Priority CAT B
Forgery - Use Forged Prescription	Priority CAT B
Forgery - Possess Dies Materials Or Dyes To Make Counterfeit Note Or Coins	Priority CAT B
Forgery - Make Counterfeit Currency With Intent	Priority CAT B
Forgery - Possess Counterfeit Money	Priority CAT B
Public Order – Affray	Priority CAT B
Public Order – Other	Priority CAT B
Breach Of Non Harassment Order	Priority CAT B
Abscond Lawful Custody	Priority CAT B
Facilitate Illegal Entry Into The United Kingdom	Priority CAT B
Aliens And Immigration Offences - Illegal Entry Into The Uk	Priority CAT B
Supply Controlled Drug	Priority CAT B
Possess Controlled Drugs	Priority CAT B
Cannabis Production	Priority CAT B
Export Controlled Drugs	Priority CAT B
Possess Crack Cocaine	Priority CAT B
Produce Controlled Drug	Priority CAT B
Possession With Intent To Supply	Priority CAT B
Obstruct Powers Of Search	Priority CAT B
Cocaine Production	Priority CAT B
Cocaine Supply	Priority CAT B
Cocaine Possession With Intent To Supply	Priority CAT B
Heroin Production	Priority CAT B
Heroin Supply	Priority CAT B
Heroin Possession With Intent To Supply	Priority CAT B
Other Class A Production	Priority CAT B
Other Class A Supply	Priority CAT B
Other Class A Possession	Priority CAT B
Other Class A Possession With Intent To Supply	Priority CAT B
Other Class B Production	Priority CAT B
Other Class B Supply	Priority CAT B
Other Class B Possession	Priority CAT B
Other Class B Possession With Intent To Supply	Priority CAT B
Other Class C Production	Priority CAT B
Other Class C Supply	Priority CAT B
Other Class C Possession	Priority CAT B
Other Class C Possession With Intent To Supply	Priority CAT B

Production (unspecified drugs)	Priority CAT B
Supply (unspecified drugs)	Priority CAT B
Possession (unspecified drugs)	Priority CAT B
Possession with intent to supply (unspecified drugs)	Priority CAT B
Concealing Or Disguising Criminal Property	Priority CAT B
Drugs - Facilitates Acquisition, Retention, Use Or Control Of Criminal Property, By Or On Behalf Of Another Person	Priority CAT B
Acquisition, Possession Or Use Of Proceeds Of Drug Trafficking	Priority CAT B
Cannabis Possession With Intent To Supply	Priority CAT B
Cannabis Possession With Intent To Supply	Priority CAT B
Production of a Controlled Drug – Class B Mephedrone	Priority CAT B
Supplying or Offering To Supply a Controlled Drug – Class B Mephedrone	Priority CAT B
Possession of a Controlled Drug – Class B Mephedrone	Priority CAT B
Possession Of A Controlled Drug With Intent To Supply – Class B Mephedrone	Priority CAT B
Permitting Premises To Be Used For Unlawful Purposes – Class B Mephedrone	Priority CAT B
Production of a Controlled Drug – Class A Mdma	Priority CAT B
Supplying Or Offering To Supply Or Being Concerned In Supplying Or Offering To Supply A Controlled Drug – Class A MDMA	Priority CAT B
Possession Of A Controlled Drug – Class A MDMA (Ecstasy)	Priority CAT B
Possession Of A Controlled Drug With Intent To Supply – Class A MDMA (Ecstasy)	Priority CAT B
Permitting Premises To Be Used For Unlawful Purposes – Class A MDMA (Ecstasy)	Priority CAT B
Production of a Controlled Drug – Class A Methadone	Priority CAT B
Supplying or Offering To Supply a Controlled Drug – Class A Methadone	Priority CAT B
Possession Of A Controlled Drug – Class A Methadone	Priority CAT B
Possession Of A Controlled Drug With Intent To Supply – Class A Methadone	Priority CAT B
Permitting Premises To Be Used For Unlawful Purposes – Class A Methadone	Priority CAT B
Produce/Being Concerned In The Production Of A Drug Subject Of A Temporary Class Drug Order	Priority CAT B
Supply/Offer To Supply a Drug Subject Of A Temporary Class Drug Order	Priority CAT B
Possess With Intent To Supply A Drug Subject Of A Temporary Class Drug Order	Priority CAT B
Permit The Use Of Premises For The Supply/Production Of A Drug Subject Of A Temporary Class Drug Order	Priority CAT B
Obstruct A PC In Exercise Of A Section 23A(6) Power To Detain/Search A Person/Vehicle/Vessel Regarding A Drug Subject Of A Temporary Class Drug Order	Priority CAT B
Concerned In The Fraudulent Invasion Of A Prohibition On The Importation Of A Controlled Drug - Khat	Priority CAT B
Offence In Relation To The Unlawful Importation Of A Drug Controlled Under The Misuse Of Drugs Act 1971 -Khat	Priority CAT B
Offence In Relation To The Unlawful Exportation Of A Drug Controlled Under The Misuse Of Drugs Act 1971 -Khat	Priority CAT B
Production Of Or Being Concerned In Production Of A Controlled Drug - Khat	Priority CAT B

Supplying Or Offering To Supply Or Being Concerned In Supplying A Controlled Drug - Khat	Priority CAT B
Possession Of A Controlled Drug - Khat	Priority CAT B
Possession Of A Controlled Drug With Intent To Supply - Khat	Priority CAT B
Permitting Premises To Be Used For Unlawful Purposes - Khat	Priority CAT B
Possess a Psychoactive Substance with Intent to Supply	Priority CAT B
Public Order - Racially Aggravated - Criminal Damage Dwelling	Priority CAT B
Public Order - Racially Aggravated - Damage Not A Dwelling	Priority CAT B
Public Order - Racially Or Religiously Aggravated - Harassment, Alarm Or Distress (Section 5)	Priority CAT B
Public Order - Racially Or Religiously Aggravated - Intentional Harassment, Alarm Or Distress (Section 4A)	Priority CAT B
Public Order - Racially Or Religiously Aggravated - Fear Or Provocation Of Violence (Section 4)	Priority CAT B
Public Order - Racially Or Religiously aggravated - Harassment	Priority CAT B
Public Order - Racially Aggravated - Damage To A Motor Vehicle	Priority CAT B
Public Order - Racially Aggravated - Criminal Damage Other	Priority CAT B
Football - Failure To Comply With The Requirements Of A Football Banning Order	Priority CAT B
Public Order Harassment/Alarm/Distress (Rail Staff)	Priority CAT B
Railway - Excess Alcohol Rail Worker	Priority CAT B
Railway - Operator Of Transport Worker	Priority CAT B
Assaulting Designated/Accredited Person Or Person Assisting	Priority CAT B
Firearms - Acquire/Possess Firearm Under 17	Priority CAT B
Firearms - Acquire/Possess Firearm Under 14	Priority CAT B
Firearms - Loaded Or Unloaded Or Imitation Firearm Or Air Weapon In Public Place	Priority CAT B
Firearms - Air Weapon/Ammunition Under 17	Priority CAT B
Firearms - Acquire/Possess Shotgun Under 15 Without Adult Supervision	Priority CAT B
Firearms - Trespass On Land With A Firearm	Priority CAT B
Possess Offensive Weapon	Priority CAT B
Having An Article With Blade Or Point In Public Place	Priority CAT B
Other Offences Includes Trespass On Premises With Weapon Of Offence	Priority CAT B
Road Traffic -Dangerous Driving	Priority CAT B
Road Traffic -Driving/In Charge Of Motor Vehicle While Unfit Through Drink/Drugs	Priority CAT B
Road Traffic - Failure To Provide Breath Specimen	Priority CAT B
Road Traffic -Tamper With Motor Vehicle	Priority CAT B
Theft - Take Pedal Cycle Without Consent Of The Owner	Priority CAT B
Common Assault/Battery With No Injury	Priority CAT B
Public Order - Harassment - Causing Intentional Harassment Alarm Or Distress	Priority CAT B
Public Order - Breach Of The Peace	Priority CAT B
Bomb Hoax - Placing Any Article In Any Place Or Dispatching Articles By Post	Priority CAT B

Bomb Hoax - Communicating False Information Alleging Presence Of Bomb	Priority CAT B
Public Order - Fear Or Provocation Of Violence	Priority CAT B
Police - Assault Without Injury On A Police Officer	Priority CAT B
Unauthorised Access To Computer Material	Priority CAT B
Railway - Aggravated Trespass	Priority CAT B
Football - Unauthorised Sale Of Football Tickets	Priority CAT B
Public Order - Send Obscene/Threatening Material	Priority CAT B
Exposing Children And Young Persons To Danger	Priority CAT B
Other Notifiable Crimes Not Listed	Refer to OMU Managers
Theft - By Shoplifting - Property Value Under £200	Non-Priority CAT C
Trade Description	Non-Priority CAT C
Failing To Disclose Information	Non-Priority CAT C
Damage Build/Works - Damage under £300	Non-Priority CAT C
Damage Rolling Stock - Damage under £300	Non-Priority CAT C
Damage S&T Equipment - Damage under £300	Non-Priority CAT C
Damage Tenants Property - Damage under £300	Non-Priority CAT C
Damage Other - Damage under £300	Non-Priority CAT C
Damage Rolling Stock By Stone Throwing	Non-Priority CAT C
Bail - Indemnify Surety For Bail	Non-Priority CAT C
Public Nuisance	Non-Priority CAT C
Customs Offences	Non-Priority CAT C
Rabies Control	Non-Priority CAT C
Cannabis Possession	Non-Priority CAT C
Cocaine Possession	Non-Priority CAT C
Heroin Possession	Non-Priority CAT C
Scrap Metal Dealer Offences	Non-Priority CAT C
Confiscation Of Tobacco Products (Under 18)	Non-Priority CAT C
Byelaws - Public Order Related Rail Staff Only	Non-Priority CAT C
Purchase Scrap Metal For Cash	Non-Priority CAT C
Breach Of Anti Social Behaviour Order	Non-Priority CAT C
Taxi Touts	Non-Priority CAT C
Failure To Comply With Level Crossing Sign	Non-Priority CAT C
Failure To Provide A Sample While In Custody	Non-Priority CAT C
Police Civil - Impersonate Civil Police Officer Or Special Constable	Non-Priority CAT C
Malicious Fire Alarm	Non-Priority CAT C
Impersonating A Designated/Accredited Person	Non-Priority CAT C
Obstruct/Hinder Other Emergency Worker In Pursuance Of Duty (not Police)	Non-Priority CAT C
Petty Assault Of An Emergency Worker (Not Police)	Non-Priority CAT C
Railway - Byelaws - Offences Re Dry Trains (Alcohol)	Non-Priority CAT C
Railway - Byelaws - Offences Re Travel Fraud	Non-Priority CAT C
Railway - Byelaws - Passenger Control	Non-Priority CAT C

Railway - Byelaws - Public Order Related (public)	Non-Priority CAT C
Railway - Byelaws - Protection Equipment	Non-Priority CAT C
Railway - Byelaws - Betting Loitering	Non-Priority CAT C
Railway - Byelaws - Litter	Non-Priority CAT C
Railway - Byelaws - Vehicle Related Offences	Non-Priority CAT C
Railway - Byelaws - Fail To Give Name & Address	Non-Priority CAT C
Railway - Fail Screening Test	Non-Priority CAT C
Railway - Fail Evidential Test	Non-Priority CAT C
Railway - Impairment Rail Worker	Non-Priority CAT C
Railway - Employer Of Transport Worker	Non-Priority CAT C
Kerb Crawling	Non-Priority CAT C
Nuisance Telephone Calls	Non-Priority CAT C
Fail to leave a location and not return	Non-Priority CAT C
Railways - Travel Fraud	Non-Priority CAT C
Railways - Travel Fraud (Travel Greater Distance)	Non-Priority CAT C
Railways - Travel Fraud (Fail To Give Name & Address)	Non-Priority CAT C
Misue Of Communication Cord	Non-Priority CAT C
Railways - Obstruct Railway Servant	Non-Priority CAT C
Railways - Misconduct Of Servant	Non-Priority CAT C
Railways - Omit To Fasten Gate	Non-Priority CAT C
Railways - Trespass And Refuse To Quit Carriage	Non-Priority CAT C
Railway Trespass	Non-Priority CAT C
Railways - Trespass And Refuse To Quit	Non-Priority CAT C
Railways - Trespass After Warning	Non-Priority CAT C
Police - Impersonate Btp Police Officer	Non-Priority CAT C
Railways - Stone Throwing	Non-Priority CAT C
Railways - Travel Fraud Fail To Show Ticket Etc.	Non-Priority CAT C
Railways - Fail To Provide Details For Penalty Fare Issue	Non-Priority CAT C
Resisting/Obstructing Designated/Accredited Person	Non-Priority CAT C
Fail To Provide Name & Address Etc Or Fail To Remain With Constable	Non-Priority CAT C
Road Traffic -Drive Without Insurance	Non-Priority CAT C
Road Traffic -Driving A Motor Vehicle Use Mobile Phone	Non-Priority CAT C
Drunk & Disorderly	Non-Priority CAT C
Drunk & Incapable	Non-Priority CAT C
Leave/Deposit Litter	Non-Priority CAT C
Football - Being In Possession intoxicating liquor or Drunk On A Vehicle (Travelling To And From Sporting Event)	Non-Priority CAT C
Alcohol Licensing Offences	Non-Priority CAT C
Road Traffic -Fail To Stop After Road Traffic Accident/ Report An Accident	Non-Priority CAT C
Road Traffic -Failing To Provide Information To Identify Driver Of Motor Vehicle	Non-Priority CAT C
Road Traffic -Using Motor Vehicle Without Test Certificate	Non-Priority CAT C
Road Traffic -Careless Driving	Non-Priority CAT C

Road Traffic - Drive Without Seatbelt	Non-Priority CAT C
Road Traffic - Driving While Disqualified From Holding Or Obtaining Licence	Non-Priority CAT C
Road Traffic - Fail To Obey Traffic Signs	Non-Priority CAT C
Road Traffic - Other Offences Not Listed	Non-Priority CAT C
Police - Waste Police Time	Non-Priority CAT C
Fire Service - False Calls To Fire Service	Non-Priority CAT C
Public Order - Harassment/Alarm/Distress (public)	Non-Priority CAT C
Public Order - Begging	Non-Priority CAT C
Bail - Fail To Answer/Absconding From Bail	Non-Priority CAT C
Police - Resist Or Obstruct Police	Non-Priority CAT C
Indecent Phone Calls	Non-Priority CAT C
Fly Tipping	Non-Priority CAT C
Prostitute Soliciting In Street Or Public Place	Non-Priority CAT C
Minor Offences Not Listed	Non-Priority CAT C
Found in enclosed premises	Non-Priority CAT C
Public Order - Consume Alcohol In A Designated Public Place	Non-Priority CAT C
Urinating / Defacating In Public	Non-Priority CAT C
Obstruct Railway Line (Minor)	Non-Priority CAT C
Public Order - Throwing Fireworks	Non-Priority CAT C