

**Live Facial Recognition – Op Overwatch
Equality Impact Assessment****Live Facial Recognition(LFR)- Op Overwatch
Equality Impact Assessment (EIA)**

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Date:	06/08/2026

Version	Date Issued	Brief Summary of Change	Owner's Name
Final V1	10/02/2026	Final	LFR Operational Lead
V2	19/06/26	Adtional impacts and clarification	LFR Business Lead
V3	22/07/26	Updated following TFL engagement	LFR Business 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

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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	☐ No	☒ Yes	☐ No
B	Sex	☐ No	☒ Yes	☐ No
C	Sexual Orientation	☐ No	☐ No	☒ Yes
D	Gender Identity/Reassignment	☐ No	☒ Yes	☐ No
E	Religion or Belief	☐ No	☐ Yes	☒ No
F	Race	☐ No	☒ Yes	No
G	Pregnancy, Maternity, Paternity	☒ Yes	☐ No	☐ No
H	Marital and Civil Partnership	☐ No	☐ No	Yes
I	Neurodiversity	☐ No	Yes	No
J	Disability	☒ Yes	☒ Yes	☐ No
K	Other Issues including socio-economic and caring responsibilities	☒ No	☐ No	Yes

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
AGE: BTP Employees No Impact	The age of employability is set by the national police recruitment guidelines. The process to join the LFR team will be advertised on a platform accessible to all staff members.	N/A	N/A	N/A
SEX: 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
SEXUAL ORIENTATION: BTP Employees No impact	The process to join the LFR team will be advertised on a platform accessible to all staff members.	N/A	N/A	N/A

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	Recruitment will be auditable, transparent and set to rank specific framework. BTP are an equal opportunities employer			
GENDER IDENTITY/REASSIGNMENT: 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
Religion or Belief: 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, there will be provision for any member of staff to apply for roles irrespective of their religion or belief.	N/A	N/A	N/A

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	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.			
Race: 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
PREGNANCY OR MATERNITY/ PATERNITY: BTP Potential negative 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.	N/A	N/A	N/A

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	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. 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. A member of staff who is pregnant should be supported to remove these risks and under an appropriate risk assessment Staff on maternity leave may not have an awareness that there are vacancies within 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.	N/A	N/A	N/A

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	Recruitment will be auditable, transparent and set to rank specific framework. BTP are an equal opportunities employer			
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 Potential negative impact	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. 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. 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.	N/A	N/A	N/A



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OTHER ISSUES INCLUDING SOCIO-ECONOMIC AND CARING RESPONSIBILITIES: BTP Employees	Not impacted	N/A	N/A	N/A
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EXTERNAL IMPACT				
Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring
AGE: Potential Negative impact	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. 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	LFR Business Owner LFR Operational Lead	Ongoing	To be reviewed at conclusion of pilot

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	age are compared more than five years later. The report further notes that FRT accuracy is significantly lower for children under 13 years old, primarily due to rapid growth and changes in facial appearance. 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. Mitigation: Any addition of a child aged 13 up to but not including 18 years of age 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, as legal advice is not readily available in a timely manner children under 13 years of age are excluded from watchlists for the duration of the pilot. All decisions will be formally recorded. Operators are charged to actively manage the performance of the LFR system during a deployment; any concerns should be raised			
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	to the Bronze and Silver commanders who have the authority to halt any deployment. 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.			
SEX: Potential negative impact	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) https://proceedings.mlr.press/v81/buolamwini18a/buolamwini18a.pdf 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.	LFR Business Owner LFR Operational Lead	Ongoing	To be reviewed at conclusion of pilot



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Potential positive impact	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. Additionally, reports indicate that facial contouring through cosmetic makeup application can affect system accuracy. 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. 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.			
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	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. Mitigation 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 sex is a factor in generating an Alert. Even where an Engagement occurs, further action is not an			
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	automatic consequence, the officer would need a lawful basis to take any further action (such as an arrest). 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. 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.			
SEXUAL ORIENTATION: No Impact	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.	LFR Business Owner LFR Operational Lead	Ongoing	To be reviewed at conclusion of pilot



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GENDER IDENTITY/REASSIGNMENT:	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. Mitigation: Any individual known to be undergoing gender reassignment requires Gold Commander authorisation before inclusion on a live watchlist. 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	LFR Business Owner LFR Operational Lead	Ongoing	To be reviewed at conclusion of the pilot
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	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). 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.			
RELIGION OR BELIEF:	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.	LFR Business Owner LFR Operational Lead	Ongoing	To be reviewed at conclusion of pilot

	Respect for diversity and awareness training is embedded within BTP's training. 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. 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 is not an automatic consequence, the officer would need a lawful basis to take any further action (such as an arrest)			
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	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.			
RACE: Potential negative impact	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. Facial Recognition Technology (FRT) relies on mapping key facial indicators, which depends 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. 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	LFR Business Owner LFR Operational Lead	Ongoing	To be reviewed at conclusion of pilot

	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. Mitigation: Silver Commanders will review watchlists prior to deployment. If demographic representation is disproportionate to the operational environment, they may cancel the operation on ethical grounds. Policy criteria: the strict set LFR deployment criteria within the LFR Policy ensures no individual and/or group are targeted. 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			
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	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 would need a lawful basis to take any further action (such as an arrest). 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.			
PREGNANCY OR MATERNITY/ PATERNITY: No Impact		LFR Business Owner LFR Operational Lead		To be reviewed at conclusion of pilot
MARRIAGE AND CIVIL PARTNERSHIP: No Impact		LFR Business Owner LFR Operational Lead		To be reviewed at conclusion of pilot
NEURODIVERSITY:	Although the nature of how the LFR system operates will have no negative effects on	LFR Business Owner		To be reviewed at conclusion of pilot

Possible negative impact	those suffering from Neurodivergent conditions as it is a passive scanning tool used to create maps of facial features, the wider operation must be noted as having a potential impact. The presence of the equipment, signage and officers taking part in an operation have the potential to cause; Heightened Sensory Overload Many neurodivergent individuals (especially those with autism) process environmental stimuli differently, sometimes experiencing hyper-sensitivities. • Acoustic and Visual Triggers: Visible cameras, blinking lights, and the mechanical whirring of automated tracking equipment can become significant sources of visual and auditory distress. • Cognitive Drain: Processing this extra sensory input leaves fewer cognitive resources available for	LFR Operational Lead		
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	completing everyday tasks or concentrating on work/study. The Pressure to "Mask" or "Camouflage" Surveillance systems inherently promote a standard of "normal" or expected behaviour, which can force neurodiverse individuals into constant self-monitoring. [1] • Behaviour Suppression: Fear of being flagged by a camera or software can lead individuals to suppress coping mechanisms or involuntary movements, such as <i>stimming</i> (self-stimulatory behaviour). • Burnout: Masking to appear neurotypical is heavily documented to cause profound exhaustion, anxiety, and long-term mental health Involuntary Cognitive and Physiological Responses			
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	Research into the psychology of being watched reveals that surveillance alters fundamental brain functions. • Hyper-Vigilance: Studies show that being visibly monitored significantly speeds up an individual's involuntary facial recognition capabilities, causing the brain to stay in a continuous state of heightened vigilance. • Anxiety and Paranoia: For individuals prone to social anxiety or sensory sensitivities, continuous observation can intensify paranoia and elevate feelings of vulnerability, sometimes worsening overall mental well-being. Mitigations BTP operations are advertised in advance on social media and the BTP			
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	website to give notice of where the operation will be held. Signage will be placed outside the operational zone to give warning that an operation is ongoing, where stakeholders are able to do so audio messages will be played over the stations public announcement systems stating that an operation is underway. The deployments will always be designed to allow a route to either exit or enter the station that does not require a person to pass through a zone of recognition, maps are placed on the BTP website to demonstrate these areas of non-compliance. Flashing lights and sounds are minimised on the equipment so the only visual and audible alarms can be seen or heard only when starting up the equipment for approximately 2 seconds, and in the case of overheating which will			
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	lead to the equipment being turned off by an operator.			
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 reflect an individual's current facial appearance. 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.	LFR Business Owner LFR Operational Lead		To be reviewed at conclusion of pilot

	Mobility 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 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. The camera angle and the LFR system's capability to template persons with genetic and/ or medical conditions that impact on a person's height and/or wheelchair / mobility scooter users could cause misidentification due to the increased pitch required. 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			
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	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 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. Visual impairment 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.			
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	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. 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 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. Unable to mitigate/residual risk			
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	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 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. Policy criteria: the strict set LFR deployment criteria within the LFR Policy ensures no individual and/or group are targeted. Operators are charged to actively manage the performance of the LFR system during a deployment, any concerns should be raised			
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	to the Bronze and Silver commanders who have the authority to halt any deployment.			
OTHER ISSUES INCLUDING SOCIO-ECONOMIC AND CARING RESPONSIBILITIES: Potential impact	There is the possibility that the deployment of LFR technology could have an impact on businesses that operate on the railway concourse. 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. 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 the deployment and also improving the confidence and reassurance of staff in the stores as well as commuters. The deployments will not take place at any location that would significantly impact a person's ability to seek medical help or to	LFR Business Owner LFR Operational Lead	Ongoing	To be reviewed at conclusion of pilot



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	obtain prescribed medication from an authorised pharmacy. There have been concerns raised that those who subject others from immigrant communities to domestic abuse or controlling behaviour may use the deployment of LFR technology as a method to induce compliance from fear around immigration status to continue the abuse			
THE PUBLIC: Positive impact	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 railway and mean less members of the public come to harm on it.	LFR Business Owner LFR Operational Lead	Ongoing	To be reviewed at conclusion of pilot

Negative impact	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. Mitigation 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 Commander or stakeholders the operational command team will review the operation and may postpone the deployment. 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,			
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	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.			
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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.
- Enable early apprehension of subjects who are wanted for outstanding offences, currently wanted on warrant, and discourage/prevent subjects committing further offences.



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- 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 disproportionality 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 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.



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- 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 the 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 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



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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.



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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.

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 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	1 -Concern raised about bias against certain minority groups has reported to be present in facial recognition technology. 2-Concern raised about networking of camera systems and privacy concerns- of Police Information (MOPI) and the Data Protection Act (DPA).	12/11/25	1-Answered with research document from NEC and Digital barriers from NPL and NIST testing of algorithm. 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 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	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



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	robust, and any data compiled from those people stopped is properly shared for transparency and governance		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	
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	



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Gypsy Roma Traveller Police Association	No Concerns raised	21/10/25	
The Rainbow Network 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	Considered the impact of this technology on both ethnic groups and Sex raised concerns about possible bias within the algorithm. Concerns also raised about the potential use of images of unknown suspects which had been included in the policy document.	08/12/25	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. frt-equitability-study_mar2023.pdf Unknown suspects inclusion on watchlist would be only in extremely limited circumstances where the threat to public



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			safety was considered so serious that any impact on individuals by wrongful matching by the algorithm would be assessed as proportionate 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	23/01/26	
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 meters requires the provision of rest stops, this was already considered in the	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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	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	
TFL- Trade unions meeting	Concerns raised about members of staff being scanned. Concerns about data sharing, between BTP and supplier.	04/06/26	Deployments are planned in partnership with railway management, where it is reasonable and practical to do so zones of recognition will not be on station barrier lines or any other location will spend significant amounts of time, we can not rule out that staff members may have to pass through the zone to complete security checks. Confirmed no data sharing takes place with third parties, all data is managed/owned by BTP and no other party has access to it.
TFL- EAWG and Hate Crime Transport Taskforce	Question raised around equality and reviews of decisions made by	09/06/26	All monitoring during the pilot is internal through facial recognition board and the pilot command team, in the event of full roll out of



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	system operators and engagement officers. Question raised around monitoring and scrutiny of LFR deployments and outcomes.		the technology BTP will consider the MOPAC ethics Panel recommendations and where compatible with the BTP operating model seek to adopt these recommendations.
TFL- Independent Disability Advisory group	Scope for use of LFR in safeguarding Confirmation about the complaints process. Concerns about the algorithms accuracy rates with persons from differing ethnic backgrounds. Accessibility of posters/leaflets and website.	18/06/26	Safeguarding will be considered as part of the wider rollout of the technology should this occur, issues around data sharing exist as BTP do not own missing persons. Complaints dealt with under existing processes that are legally mandated. NPL findings around accuracy rate provided ftr-equitability-study_mar2023.pdf Accessibility of posters leaflets has been considered by they follow the NPCC templates. Website is partially compliant with Web Content Accessibility Guidelines version 2.2 AA standard



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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? ^(OJ)

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



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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 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:

P Fulton

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Rank / Grade	Chief Superintendent
Date:	06/08/26