

Equality impact assessment:

S5100 and S5101 Live Facial Recognition – Kent Police

Version control

Version number	Date	Author	Comments
1	30/04/2023	Scott Ashby	
2	09/08/2024	Jennifer Housego	
3	27/05/2025	D/Supt Jennings	
4	03/09/2026	Aaron Watkin	Reviewed and amended to reflect Kent Police deployment of LFR.

Overview

Name of product under development or review	Live Facial Recognition (LFR)
Description of the product	Live Facial Recognition software takes images obtained from CCTV cameras, extracts biometric data from facial images and compares that data against a pre-loaded watchlist. The system generates an alert where it identifies a potential match. Kent Police intends to adopt LFR for operational use using the existing Essex Police model and will create joint policy and procedure where appropriate. Kent Police is using Essex testing evidence, deployment controls, public engagement learning and review arrangements, adapted where required for

	Kent governance and local operational context.
EIA start date	01/09/2026
EIA author and role	Kent Police – DI Watkin
EIA owner and role	Kent and Essex Police Authorising Officer – Detective Superintendent Stephen Jennings
Date of last review	01/09/2026
Date of next review	

Key product development dates

To evidence PSED compliance, equality and inclusion must be considered throughout the life cycle of a product. You can do this by integrating EIA reviews into key product development stages. List your product's key stages and the dates you will review your EIA here.

Key stage	Date
Procurement phase and pre deployment testing	01/01/2024 to 31/07/2024
Post testing and Initial Deployment	30/09/2024 to 31/10/2024
Cambridge Testing – Controlled sensitivity and specificity testing	01/12/2024 to 31/03/2024
ISO 42001 Accreditation	17/03/2025

National Physical Laboratory (NPL) testing	21/05/2025 ongoing
Professor Fussey – Equitability Assessment	Completed for Essex

Research and evidence

To undertake effective equality assessment that meets PSED compliance standards, you must work from an evidence base. Use this section to list the research you will use to understand the product's potential or actual equality impacts (for example, surveys, customer feedback, protected characteristic data, academic research).

1. NIST algorithm study results for Corsight algorithm July 2022 (provided by supplier during procurement in support of PSED evidence)
2. Department of Homeland Security (US) study results for Corsight algorithm July 2022 (Provided by supplier during procurement in support of PSED evidence)
3. Internal Assessment of a Live Facial Recognition Deployment following a false positive alert which occurred on 19th October 2024.
4. Cambridge University Study - Controlled sensitivity and specificity testing.
5. ISO 42001 accreditation.
6. Professor Peter Fussey – independent academic review of the LFR evaluation informing Kent Police usage and deployment.
7. University research into public perception and the policing impact of Live Facial Recognition, used to inform Kent Police adoption and engagement.

Consultation and Engagement record

Stakeholder consultation will give you a better understanding of your product's impacts and is crucial to satisfying the PSED requirements. Use this section to record the engagement you have undertaken, summarise the feedback received and note subsequent actions. This section can also be used to record nil returns.

Name of group or organisation	Date of contact	Date reply received	Feedback	Action taken or reason why no action was taken
Police and Crime Commissioner	24/08/2026 and 01/09/2026	24/08/2026	The PCC sought assurance around seven key areas: communications and stakeholder engagement, data retention and deletion, intervention thresholds following alerts, handling of false positives, watchlist criteria and authorisation, community confidence and consultation, and post-trial evaluation.	Kent Police's response emphasised strong governance, transparency and safeguards. This includes comprehensive public and partner engagement, strict data protection arrangements with immediate deletion of non-matches, a four-stage human verification process before any intervention, oversight of false positives, robust authorisation and watchlist processes, ongoing community engagement supported by a Community Impact Assessment, and a full evaluation of outcomes and public confidence following the trial.

Strategic Force Independent Advisory Group	02/09/2026		Briefing to take place on 02/09/2026, chaired by Mr Burton and presented by CI Woodward and Supt Jennings. Any feedback will be considered and this document amended where required.	CI Woodward and Supt Jennings attended Force IAG and presented on LFR and the upcoming deployments within Medway. The presentation also detailed Clear, Hold, Build within Chatham which is key to why this deployment has been selected. There were a number of questions from the IAG which were answered satisfactorily and IAG were supportive of the upcoming deployments.
Kent Police Facial Recognition Ethics Review	14/07/2026	14/07/2026	Briefing sent to Ethics committee with no comments received.	N/A

Essex Police Independent Data Ethics Committee	03/12/2024	03/12/2024	Essex committee minutes available and reviewed as supporting evidence for Kent adoption.	The committee considered the use of LFR to be in the public interest. Kent Police has reviewed the feedback and actions from Essex and will use this learning to inform local policy, procedure and operational deployment arrangements.
Essex Work Experience Programme	21/08/2024	21/08/2024	Input provided to thirty secondary school aged children	No negative feedback recorded. Learning has been considered as part of the wider awareness and engagement approach for Kent.
CSAS ¹ Network Day	02/10/2024	02/10/2024	Attended by partner agencies both public, private and local councils. (50 present)	No negative feedback. Awareness Campaign

¹ Essex Police Community Safety Accreditation Scheme (CSAS)

General considerations

Use this section to note any general diversity, equality and inclusion activities or considerations that are relevant to the product. Please only document general considerations here. Protected characteristic analysis can be completed in the section below.

The purpose of the Equality Impact Assessment (EIA) is to promote fairness and inclusion to staff and the public considering all protected characteristics. This will help identify and mitigate any potential impacts on specific groups and find ways to reduce or eliminate them. This encourages evidence-based decisions considering the needs and experiences of diverse groups in line with legislation (Public Sector Equality Duty & Equality Act 2010). Leading to transparency and accountability.

Benefits of LFR

Kent Police intends to adopt LFR capability in an operational setting using the Essex Police model and learning. The results of Essex Police deployments have shown that LFR can be a valuable police tactic to locate people who are outstanding for crime, at risk of serious harm, or subject to protective orders issued by the courts.

Before any deployment of equipment, a watchlist is created. The watchlist is bespoke for every operation/deployment and the rationale for the make-up of the watchlist must be intelligence-led, justified, proportionate and necessary, with the nature of the watchlist recorded prior to each deployment.

The criteria for construction of watchlists for use with LFR must be approved by the Authorising Officer (the 'AO') and be specific to an operation or to a defined policing objective. Watchlists, and any images for inclusion on a watchlist, must also be limited to the categories of image articulated in Force policy documents which are images of people who are:

- a. wanted by the courts; and/or
- b. suspected of having committed an offence, or where there are reasonable grounds to suspect that the individual depicted is about to commit an offence or where there are reasonable grounds to suspect an individual depicted to be committing an offence; and/or
- c. subject to bail conditions, court order or other restriction that would be breached if they were at the location at the time of the Deployment; and/or
- d. missing persons deemed increased risk; and/or
- e. presenting a risk of harm to themselves or others.

CCTV footage obtained as part of an LFR deployment may identify a person's race or religion. However, the footage is used only to obtain biometric data for comparison against the watchlist and is deleted within 31 days.

The data supports the current Authorising Officer threshold of 0.55, which has remained in place throughout Essex deployments. With nearly two million faces seen, over two hundred positive alerts and only one false positive recorded, the threshold seeks to balance operational effectiveness with the need to reduce false positive alerts wherever possible.

This will again be reviewed following the Cambridge and NPL testing. Up until very recently, the NPL were not conducting any further testing of LFR software/algorithms.

Work has been undertaken to develop an evaluation framework for LFR which will be subject to independent academic review, and Kent Police is committed to ongoing testing, review and governance of the software. Kent Police will use the Essex Police evidence base and learning, including advice from independent data and digital ethics structures, to inform local policy, procedure and deployment decisions.

It is important to note that one algorithm is not the same as the next. Therefore, any threshold setting is bespoke to the specific software and determined following the analysis. This is reviewed regularly.

Impact assessment and actions

Apply learning from research, consultation and project knowledge to consider equality considerations relevant to your project. This should include any potential or actual impacts (positive or negative), as well as how the project will uphold the three PSED aims for each of the [protected characteristics](#).

1. Eliminate discrimination, harassment and victimization.
2. Advance equal opportunity.
3. Foster good relations between people of different characteristics.

If you have identified a negative impact, note what mitigating action will be taken to reduce or eliminate that impact. If no mitigating action can be taken, please explain why. The issues or impacts identified may change, or new factors may emerge, as your project

develops. Use the EIA to document these and how your project has evolved to accommodate equality considerations.

Don't forget to consider intersectionality. This refers to when characteristics overlap to shape experiences of inequality and discrimination. For further information, please refer to the 'Addressing Intersectionality within Policing' report.

Duplicate the boxes below if required. If you need further information about a protected characteristic, open the webpage linked to each subtitle.

All characteristics

Details of positive and/or adverse impact or other issue

Whilst LFR deployments will not target persons owing to any protected characteristics or equality groups, there are issues that may arise because of the deployment that can have an impact. If a group is not listed below, it is because there is no anticipated differential impact on that group:

Age – Facial images uploaded will be sourced whether from existing Kent Police records or from family and friends of persons reported as missing. The reference image database, consequently, may have images of subjects that were taken a number of years ago.

The age of criminal responsibility in the UK is 10 years old. Image capture via Custody Imaging on which FRT technology is reliant, is dependent on the age, date and time at which the custody image was taken. In addition, the European Union's Agency for Fundamental Rights 'Facial Recognition Technology Fundamental Rights Considerations in the Context of Law Enforcement Report 2019' highlights that as a child grows and time passes, the accuracy of a biometric match can diminish. The risk of a failure to match increases when facial images recorded at a young age are compared more than five years after they were collected. The report further indicates that the accuracy of FRT is in general significantly lower for children younger than 13 years old. They associate this to "rapid growth and change in facial appearance".

Disability - People can undergo facial change for several reasons. They may suffer facial disfigurements through trauma or a medical intervention or their face may have reconstructive surgery which would result in a significant change to their facial features. Genetic conditions such as neurofibromatosis also cause progressive facial change. Consequently, the images that Kent Police hold may not accurately reflect their present facial appearance.

Gender reassignment – The Facial Recognition Technology (FRT) probe image is based on the mapping of key facial indicators when comparing a reference image database image for an individual. Therefore, the functionality, accuracy, and performance of FRT may be less effective if changes to facial appearance have occurred between the time the reference image database image was taken, and the time a comparison is made.

This may impact persons who are transitioning from one gender to another if gender presentation differs from the time the comparator image was taken. It may also affect trans, non-binary and gender- fluid people who adopt to flex between gender presentations. Reports suggest that facial contouring using cosmetic make-up application may impact on FRT system's performance.

Racial Groups – Kent Police serves a diverse multi-cultural area which incorporates both rural and metropolitan communities. It is therefore important to ensure that the technology is not seen to cause division between persons of different race/ethnicity.

FRT is based on the mapping of key facial indicators. They are also dependant on the ability of the algorithm to determine the key facial indicators within an image. This can be impacted by environmental factors such as ambient light and shadows factors. This may also be impacted by the depth of skin pigmentation and the use of contouring make up.

To date ethnicity biases have received considerable attention, particularly from academics and government bodies. Relevant studies include Klare et al (2012), NIST (2018) and Buolamwini and Gebru (2018). The findings from Buolamwini and Gebru's study were widely reported, as they found algorithms were particularly biased in terms of gender and ethnicity: performance was best for men and white individuals, and poor for women and black individuals.

Religion or Belief - The wearing of religious headwear or coverings and the growing of facial hair may have an impact on the effectiveness of FRT. In addition, certain cultures or sexes within a religion i.e. Amish, refuse to allow themselves to be photographed. Sensitivity therefore needs to be taken with cross-community dialogue to ensure the deployment is both necessary and proportionate.

Respect for Diversity Awareness training is embedded within Kent Police culture.

Sex - Social observation indicates women change their appearance more frequently and significantly than men which may impact the performance of LFR. Reports suggest that facial contouring using cosmetic make-up application may impact on the LFR system's performance.

Mitigating action for any adverse impact or rationale for no further action

Equitability

Procurement Phase and Pre-deployment Testing

The selection and use of a live facial recognition (LFR) provider by Kent Police will have a strong focus on the need to satisfy the PSED. Kent Police intends to use the Essex Police model and evidence base, including the chosen provider, supplier testing, independent testing, operational policy and deployment safeguards. Currently there is no nationally agreed standard for LFR, and no nationally approved or mandatory testing available until very recently. It is therefore for individual police forces to make reasonable endeavours to obtain details of independent testing conducted in relation to their chosen software and to ensure that the software is as accurate and free from bias as possible. Kent Police will adopt robust operational policy and procedures to ensure that the criteria for deployment of LFR and the way it is used by officers helps the force reinforce compliance with the PSED.

Kent Police intends to use the same LFR capability as the Essex Police model, contracted through Digital Barriers and using LFR software from Corsight.

Corsight has advised that their “algorithms have been vigorously tested independently for both accuracy and bias by the National Institute of Standards and Technology (NIST) and the Department of Homeland Security (DHS) in the US and have provided details of the results of testing in 2022. In both tests, Corsight’s algorithms were found to have one of the lowest bias differentials available of any algorithm tested. Bias differential is a calculation that distinguishes false-match rates (FMR) between varying demographic groups (gender, skin tone) to distinguish if there is more, or less, likelihood of a false-match when comparing two images of different demographics. The aim of all algorithms is to have a small as possible FMR difference between all demographic categories to ensure there is no more likelihood of a false match between one demographic or another.

To measure this, NIST calculates what’s known as the false match rate (FMR) — how often the system incorrectly says two different people are the same. They assess this across four key demographic groups: White males, Black males, White females, and Black females. A fair system should make errors at about the same rate for all of them.

To allow for consistent comparisons across vendors, NIST sets a common baseline false match rate of 0.0010 (1 in 1,000), based on the group that tends to perform best — usually White males. Then, using that common threshold, NIST measures how each demographic group performs with every algorithm.

For Corsight’s algorithm (“Corsight_003”), the results were:

- White Male: 0.0010 (1 in 1,000)
- Black Male: 0.0007 (1 in ~1,429)
- White Female: 0.0005 (1 in 2,000)
- Black Female: 0.0011 (1 in ~909)

When analysing the results, a bias differential can be calculated of the difference between the highest and lowest FMRs to understand how evenly the algorithm performs across demographics.

- Highest FMR: 0.0011 (Black Female)
- Lowest FMR: 0.0005 (White Female)
- Bias differential: $0.0011 - 0.0005 = 0.0006$

This bias differential of 0.0006 means that the largest difference in error rates between any two demographic groups was just 6 in 10,000 comparisons, or roughly 1 in 1,667. The closer this value is to zero, the more evenly the system treats people from different demographic groups.

At the time of testing, this was the lowest bias differential observed across all submitted algorithms — demonstrating that Corsight's technology was among the most consistent and fair-performing systems tested.

Corsight also participated in the challenging and highly competitive U.S. Department of Homeland Security (DHS) Biometric Technology Rally in September 2022. For the purpose of anonymised evaluation and comparison, Corsight was assigned the pseudonym "Tioga", as per the event protocol. The official results are publicly available on the DHS website.

This focussed on testing biometric algorithms in realistic, high-traffic conditions based on varying qualities of image acquisition systems. The Corsight algorithm was top-ranked for accuracy and for being unbiased toward gender or race based on their test conditions. DHS testing is based on system aliases ... It achieved a 99.8% overall Matching True Identification Rate (TIR) and over 99.3% TIR for all skin tone groups across all acquisition systems, and under some acquisition systems had 100% TIR, demonstrating Corsight's capability to perform equally across all demographics.

A pre-deployment IT health and internal security check was carried out by Intertek NTA.

Kent Police will rely on the Essex Police pre-acceptance testing and will ensure any local implementation is supported by Kent governance, assurance and deployment readiness checks. The criteria of testing was as follows:

- Face Detection Accuracy
- Face Recognition Accuracy
- Performance Under Load
- Alert Generation
- Light/Weather Conditions
- Audit Testing
- System Performance
- Functionality Test
- Hardware/Software Installation
- Configuration Verification/Security Testing Access Control

The tests included police officers from different age ranges, sex and ethnicity. These localised results indicated that the software/algorithm was safe to use at a threshold setting of 0.45 where there were no 'false positives' recorded.

The PSED duty requirement is a continuing responsibility and Kent Police acknowledges that further and ongoing testing will assist. The threshold used by the Essex Police model was set at 0.55 for deployments and Kent Police will consider this threshold through its own authorisation and governance process.

Post testing and Initial Deployment

On the 19th October 2024, LFR was deployed in Southend on Sea city centre. During this deployment there were 1322 subjects on the approved watchlist. During the deployment 39,401 faces were scanned. There were five positive alerts leading to three arrests. One of the positive alert led to an approach to a member of public who was not the person on the watchlist. This was categorised as a false positive.

This was the first and only false positive recorded during Essex Police use of LFR to date.

Kent Police will use the findings from this review to inform local deployment controls, image quality requirements and officer briefing.

A full analysis took place to understand why a false positive had occurred. The results showed that the image uploaded to software of the person sought was a 'thumbnail' version and not the original. Therefore, the pixelation was lower and led to the false positive. Working with Corsight, the software has now been re-configured to prevent an image below a certain level being uploaded which will prevent a repeat of false positive.

As part of the review of the false positive, the CCTV footage was analysed with the same watchlist in a controlled environment at the Police Station but varying the threshold levels. The results of which were as follows;

The threshold levels were set at 0.30 and 0.40 respectively. At 0.40 a total of 9 individuals were subject of positive alerts. 5 of which matched the positive alerts from the live deployments. The additional 4 were not subjected of alerts during the live deployment which suggested that they were missed due to the threshold set. The images on the watchlist and on the camera footage were visually viewed and appeared to be the same people but not conclusive. This suggested that there were no issues with the software and showed that four individuals on the watchlist were missed at the threshold setting of 0.55. They would have been alerted at 0.40.

Cambridge Testing – Controlled sensitivity and specificity testing

Cambridge University has carried out a study examining the accuracy of the Corsight algorithm. Kent Police will use this evidence as part of its adoption of the Essex Police model and to support ongoing PSED compliance.

The study took place in February 2025 using 188 actors of whom sex, age and ethnicity varied to test if accuracy differs by demographic. This was a broad replication of the NPL testing of the NEC software.

This was looking at a) the efficiency of the software in identifying people we knew were present and b) the inefficiency of the software in identifying people it should not have. The design is intended to replicate real-world conditions of an LFR deployment.

The study addresses three research questions.

- a. What is the overall sensitivity and specificity of the Corsight software at different confidence thresholds?
- b. What (if any) is the disparity in sensitivity and specificity rates between (i) age groups, (ii) sexes, and (iii) ethnicity groups
- c. What is the association between occlusions and any disparities identified in b.

An interim report has been received and the results are being assessed. In summary, the study supports the decision to set the initial threshold at 55% (0.55), suggesting the algorithm itself is unlikely to lead to false positives at this rate. The study also indicates that the Corsight algorithm performs well at significantly lower threshold levels with minimal risk of false positives. Kent Police will consider the final findings through its own governance and authorisation process, with a further update added to this document when available.

ISO 42001 Accreditation

The ISO/IEC 42001 standard, set to guide AI practices, helps ensure compliance with principles of AI accountability, transparency, and governance. The National Police Chiefs Council Approved Professional Practice document interpreted regulatory guidance following Bridges. On 17th March 2025 the Corsight software achieved the accreditation.

Professor Pete Fussey (Southampton University) & Dr Daragh Murray (University of London)

Professor Fussey will be conducting independent academic review of the LFR evaluation informing Kent Police adoption. The work will focus on issues of ethics, human rights compliance, and governance and is designed to complement the ongoing technical evaluation. The main focus will be on.

- 1) Evaluation – proposed plans for LFR technology use.
- 2) Deployment & Operations – advice and guidance on operational policy, practice and deployments.
- 3) Outreach and Engagement - To provide advice and guidance on the approach to engagement with the local community to increase trust and confidence as well as transparency.

University research project: *'Understanding Public Perception and the Policing Impact of Live Facial Recognition'*

This research aims to evaluate the impact of Live Facial Recognition (LFR) technology on policing through location-based law enforcement deployments and will inform Kent Police adoption, engagement and review arrangements.

The project will look at analysing three main areas of interest;

- 1) The public
- 2) Local Businesses
- 3) Social Media

Code of Ethics

The Code of Ethics sets and defines the exemplary standards of behaviour for everyone who works in policing. The Code of Ethics is about self-awareness, ensuring that everyone in policing feels able to always do the right thing and is confident to challenge colleagues irrespective of their rank, role or position.

Age

Details of positive and/or adverse impact or other issue

Facial images uploaded will be sourced whether from existing Kent Police records or from family and friends of persons reported as missing. The reference image database, consequently, may have images of subjects that were taken a number of years ago.

The age of criminal responsibility in the UK is 10 years old. Image capture via Custody Imaging on which FRT technology is reliant, is dependent on the age, date and time at which the custody image was taken. In addition, the European Union's Agency for Fundamental Rights 'Facial Recognition Technology Fundamental Rights Considerations in the Context of Law Enforcement Report 2019' highlights that as a child grows and time passes, the accuracy of a biometric match can diminish. The risk of a failure to match increases when facial images recorded at a young age are compared more than five years after they were collected. The report further indicates that the accuracy of FRT is in general significantly lower for children younger than 13 years old. They associate this to "rapid growth and change in facial appearance".

Mitigating action for any adverse impact or rationale for no further action

Any watchlist created will be done so as close to the deployment as possible, therefore hoping to ensure the most accurate and up to date images of persons being added are

uploaded. If the LFR software highlights a potential match, Police personnel will check the images highlighted for accuracy.

At a threshold of 0.6, the NPL confirm testing shows the false positive identification rate was equitable between all age groups tested.

Disability or neurodiversity

Details of positive and/or adverse impact or other issue

Disability - People can undergo facial change for several reasons. They may suffer facial disfigurements through trauma or a medical intervention or their face may have reconstructive surgery which would result in a significant change to their facial features. Genetic conditions such as neurofibromatosis also cause progressive facial change. Consequently, the images that Kent Police hold may not accurately reflect their present facial appearance.

Mitigating action for any adverse impact or rationale for no further action

Where a person's facial appearance has changed between the reference image being taken or provided and an LFR deployment, the software may be less likely to identify a potential match. If a potential match is generated, police personnel will check the images for accuracy before any further action is considered. This limitation is acknowledged, particularly where Kent Police is seeking to locate someone for safeguarding purposes or because they are wanted. The primary mitigation is to use the most recent and suitable image available and to retain human review before any intervention.

Gender reassignment

Details of positive and/or adverse impact or other issue

The Facial Recognition Technology (FRT) probe image is based on the mapping of key facial indicators when comparing a reference image database image for an individual. Therefore, the functionality, accuracy, and performance of FRT may be less effective if changes to facial appearance have occurred between the time the reference image database image was taken, and the time a comparison is made.

This may impact persons who are transitioning from one gender to another if gender presentation differs from the time the comparator image was taken. It may also affect trans, non-binary and gender- fluid people who adopt to flex between gender

presentations. Reports suggest that facial contouring using cosmetic make-up application may impact on FRT system's performance.

Mitigating action for any adverse impact or rationale for no further action

Where a person's facial appearance has changed between the reference image being taken or provided and an LFR deployment, the software may be less likely to identify a potential match. If a potential match is generated, police personnel will check the images for accuracy before any further action is considered. This limitation is acknowledged and will be managed by using the most recent and suitable image available and retaining human review before any intervention.

Marriage and civil partnership

Details of positive and/or adverse impact or other issue

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

Mitigating action for any adverse impact or rationale for no further action

N/A

Pregnancy and maternity

Details of positive and/or adverse impact or other issue

There is no anticipated differential impact based on pregnancy or maternity.

Mitigating action for any adverse impact or rationale for no further action

N/A

Ethnicity

Details of positive and/or adverse impact or other issue

Kent Police serves a diverse multi-cultural area which incorporates both rural and metropolitan communities. It is therefore important to ensure that the technology is not seen to cause division between persons of different race/ethnicity.

FRT is based on the mapping of key facial indicators. They are also dependant on the ability of the algorithm to determine the key facial indicators within an image. This can be impacted by environmental factors such as ambient light and shadows factors. This may also be impacted by the depth of skin pigmentation and the use of contouring make up.

To date ethnicity biases have received considerable attention, particularly from academics and government bodies. Relevant studies include Klare et al (2012), NIST (2018) and Buolamwini and Gebru (2018). The findings from Buolamwini and Gebru's study were widely reported, as they found algorithms were particularly biased in terms of gender and ethnicity: performance was best for men and white individuals, and poor for women and black individuals.

Mitigating action for any adverse impact or rationale for no further action

The NPL findings show that with a threshold setting of 0.6 and above, the false positive identification rate and the true positive identification rate between different ethnicities were equitable.

If the LFR software highlights a potential match, Police personnel will check the images highlighted for accuracy before additional activity is considered.

Religion or belief

Details of positive and/or adverse impact or other issue

The wearing of religious headwear or coverings and the growing of facial hair may have an impact on the effectiveness of FRT. In addition, certain cultures or sexes within a religion i.e. Amish, refuse to allow themselves to be photographed. Sensitivity therefore needs to be taken with cross-community dialogue to ensure the deployment is both necessary and proportionate.

Respect for Diversity Awareness training is embedded within Kent Police culture.

Mitigating action for any adverse impact or rationale for no further action

Any watchlist created will be done so as close to the deployment as possible, therefore hoping to ensure the most accurate and up to date images of persons being added are uploaded. If the LFR software highlights a potential match, Police personnel will check the images highlighted for accuracy.

Should a person be wearing some form of headwear or covering, it could mean that the LFR software would be less likely to highlight a match between the image taken during deployment and that on the watchlist. The reality is that if we were trying to locate someone for safeguarding purposes, wanted persons etc, the software may not highlight a match. There are no actions that can be undertaken to stop this from happening.

Sex

Details of positive and/or adverse impact or other issue
Social observation indicates women change their appearance more frequently and significantly than men which may impact the performance of LFR. Reports suggest that facial contouring using cosmetic make-up application may impact on the LFR system's performance.
Mitigating action for any adverse impact or rationale for no further action
Any watchlist created will be done so as close to the deployment as possible, therefore hoping to ensure the most accurate and up to date images of persons being added are uploaded. If the LFR software highlights a potential match, Police personnel will check the images highlighted for accuracy.
Where a person's facial appearance has changed between the reference image being taken or provided and an LFR deployment, the software may be less likely to identify a potential match. If a potential match is generated, police personnel will check the images for accuracy before any further action is considered. This will be managed by using the most recent and suitable image available and retaining human review before any intervention.

Sexual orientation

Details of positive and/or adverse impact or other issue
There is no anticipated differential impact based on sexual orientation.
Mitigating action for any adverse impact or rationale for no further action
N/A

Socio-economic background

Our socio-economic background is a combination of different factors, such as our income, occupation and social background. A person's socio-economic background can expose them to inequalities, so it's important to understand how your project could affect different socio-economic groups. Further information about socio-economic status can be found in the Cabinet Office [Measuring socio-economic background in your workforce](#) guidance.

Details of positive and/or adverse impact or other issue

There is no anticipated differential impact based on socio-economic background.

Mitigating action for any adverse impact or rationale for no further action

N/A

Other characteristics

Use this section to consider the PSED aims and any impacts your product may have on characteristics that are not protected under the Equality Act 2010 but are still significant to equality and inclusion. For example, your product may have a particular effect on people with caring responsibilities or on people with English as an added language, or you may need to consider the Welsh Language (Wales) Measure 2011 in delivery. Think creatively and invite input from stakeholders.

Details of impact or other issue

There are no additional anticipated differential impacts.

Mitigating action or rationale for no further action

N/A

Action log

Record EIA actions and monitor action progress in the optional action log.