Equality Impact Assessment- Initial Assessment

Workstream/Project: Automated Facial Recognition		Person(s) responsible for the assessment: PS4593 Rhodri Davies	Date of Assessment: 13th April 2017
1. Briefly describe the aims, objectives and purpose of the Work Stream/Review/Project.	The main purpose of the project is to introduce automated facial recognition cameras to record members of the public for the prevention and detection of crime and rendering assistance to the public. The Police and Criminal Evidence Act 1984 permits a person to be photographed or recorded with or without their consent in certain circumstances. Where an automated facial recognition camera is recording persons in live time this satisfies the following principle of the Data Protection Act (fair processing requirements): Principle 1 states that information is treated as being "fairly processed" if: • There are legitimate grounds for collecting and using the personal data; • The data is not used in ways that have unjustified adverse effects on the individuals concerned; • The intended use of the data is clear and transparent; • Personal data is only used in ways they would reasonably expect; and • Nothing unlawful is done with the data. Automated Facial Recognition will be used to record evidence which will assist officers in protecting the communities and help make South Wales a safer place to live. It is intended that the use of Automated Facial Recognition will have positive impact on: • satisfaction and confidence levels between different communities • help for the prevention and detection of crime • administration of justice • render assistance to the public		

	The decision to use Automated Facial Recognition is considered as a function for the purposes of the Equality Act 2010 and SWP must, therefore, be able to demonstrate due regard to the public sector equality Duty.
2. Are there any associated objectives of the Programme of works, please explain?	Automated Facial Recognition, have been successfully used by a number of police forces including Leicestershire Police. AFR will record evidence as part of everyday policing purposes including criminality, ASB and quality of life issues. Filming is continuous with the anticipated benefits of: • Reducing crime and anti-social behaviour • Recording will help prevent incidents/offences such as terrorism / extreme violence • Increasing public confidence and victim satisfaction • Providing transparency around the actions taken by officers and staff • Providing protection for the public and officers • Improving training and development for officers and staff
3. Who is intended to benefit from the Programme of works and in what way?	Members of the public will benefit from the use of the cameras. This is because it will help officers to adopt early intervention and assist in the prevention and detection of crime. The project is intended to benefit numerous parties, including: • Public • Officers and Police Staff in South Wales Police; • Joint Legal Services, Professional Standards Dept; • Police Federation; • Officers and staff from partner agencies, specifically the CPS, WECTU, National Security agencies
4. What outcomes are wanted from this project?	• Evidence capture • More efficient use of resources • Increased conviction rate • Improved prevention of crime and disorder • Organisational learning /potential training material from 'Real Situation' records

5. What factors / forces could contribute / detract from the outcomes?	• Comms strategy around outlining benefits internally and externally • Familiarisation with equipment / software capabilities		
6. Who are the main stakeholders in relation to the workstream?	• CPS • CJS / Courts • Public • Officers / Staff • Police Federation Those affected by use of AFR include: All officers and police staff using the equipment and utilising the footage obtained; The general public who will have their image captured either as part of an investigation or at an incident; Also members of the community going about their usual daily business. Internal stakeholders have been encouraged to engage with the AFR team via the Fusion Digital Policing group on Yammer and directly via the Fusion webpages during the scoping and feasibility stage of the project.	7. Who implements the project and who is responsible for the Programme?	Insp. Scott Lloyd – AFR Lead ; AFR Project Board (ACC Lewis / Mr Hussain); Fusion Strategic Board (Force and PCC representation); Bronze Board 1: Policing & Communities (Force and PCC representation)

8a. **Are there concerns that the workstream _could_ have a differential impact on racial groups, internally?**	No	If Yes, what existing evidence (either presumed or otherwise) do you have for this?	There is no anticipated differential impact on racial groups internally
8b. **Are there concerns that the**	No	If Yes, what existing evidence (either	AFR does not define race of an individual. When a

workstream _could_ **have a differential** <mark>**impact**</mark> **on racial groups, externally?**		**presumed or otherwise) do you have for this?**	person is potentially identified through the system. The identification is made on the match between the person's eyes and is based on algorithm matches. The camera does not define race or sex of an individual.
9a. Are there concerns that the workstream _could_ **have a differential** <mark>**impact**</mark> **on gender, internally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There is no anticipated differential impact on the basis of gender internally
9b. Are there concerns that the project _could_ **have a differential** <mark>**impact**</mark> **on gender groups, externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	The facial recognition software does not define gender of an individual and only matches the algorithm between an individual's eyes.
10a. Are there concerns that the project _could_ **have a differential** <mark>**impact**</mark> **due to disability, internally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There is no anticipated differential impact on the basis of disability internally
10b. Are there concerns that the project _could_ **have a differential** <mark>**impact**</mark> **due to disability, externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	The facial recognition software does not define a disability of an individual and there are no concerns externally
11a. Are there concerns that the project _could_ **have a differential** <mark>**impact**</mark> **due to sexual orientation, internally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There is no anticipated differential impact on the basis of sexual orientation internally
11b. Are there concerns that the project _could_ **have a differential** <mark>**impact**</mark> **due to sexual orientation, externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	No specific positive impact related to Sexual Orientation, AFR will not define sexual orientation. Disclosure of material/evidence obtained via AFR should be considered carefully in relation to private and personal information that may have been obtained.
12a. Are there concerns that the project _could_ **have a differential** <mark>**impact**</mark> **due to**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for**	There is no anticipated differential impact on the basis of age internally

their Age, internally?		this?	
12b. **Are there concerns that the project _could_ have a differential impact due to their Age, externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	AFR does not distinguish the age of an individual and only identifies a person by the distance between the eyes measuring algorithms. There will be no impact in this area.
13a. **Are there concerns that the project _could_ have a differential impact due to their religious belief, internally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There is no anticipated differential impact on the basis of religious belief internally
13b. **Are there concerns that the project _could_ have a differential impact due to their religious beliefs, externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	AFR does not distinguish the religious beliefs of an individual and only identifies a person by the distance between the eyes measuring algorithms. There will be no impact in this area Disclosure of material/evidence obtained via AFR should be considered carefully in relation to private and personal information that may have been obtained.
14a. **Are there concerns that the project _could_ have a differential impact due to the Welsh Language, internally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There is no anticipated differential impact on the basis of Welsh Language internally
14b. **Are there concerns that the project _could_ have a differential impact due to the Welsh Language, externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	AFR does not distinguish the language spoken by an individual. However, dealing with individuals who speak Welsh and choosing to converse in Welsh to non-Welsh speaking members of SWP could potentially cause reputational harm to the Force in pursuit of its aims to comply with Welsh Language standards.
15a. **Are there concerns that the project _could_ have a differential impact due to Pregnancy, internally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There is no anticipated differential impact on the basis of pregnancy/new motherhood internally. Pregnant workers and those on maternity/adoption leave will be managed in line with legislation.

15b. **Are there concerns that the project** _**could**_ **have a differential** impact **due to Pregnancy externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	No impact related to Pregnancy & Maternity. Disclosure of material/evidence obtained via AFR should be considered carefully in relation to private and personal information that may have been obtained.
16a. **Are there concerns that the project** _**could**_ **have a differential** impact **due to Gender Reassignment, internally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There is no anticipated differential impact on the basis of Gender Reassignment internally
16b. **Are there concerns that the project** _**could**_ **have a differential** impact **due to Gender Reassignment, externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There are no concerns regarding any impact for AFR for gender reassignment. The system is not gender specific and does not differentiate between males and females. The system will measure the algorithms between the subject's eyes. Disclosure of material/evidence obtained via AFR should be considered carefully in relation to private and personal information that may have been obtained. Recordings may identify that a person has undergone gender reassignment. May be at risk of harm due to this disclosure.
17a. **Are there concerns that the project** _**could**_ **have a differential** impact **due to marriage or civil partnership, internally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	There is no anticipated differential impact on the basis of marriage/civil partnership status internally
17b. **Are there concerns that the project** _**could**_ **have a differential** impact **due to marriage or civil partnership, externally?**	**No**	**If Yes, what existing evidence (either presumed or otherwise) do you have for this?**	No specific impact related to Marriage & Civil Partnership. Disclosure of material/evidence obtained via AFR should be considered carefully in relation to private and personal information that may have been

			obtained. Recordings may detail thoughts and feelings about current marital status or civil partnership that is private information.

19. Can this adverse impact be justified on the grounds of promoting equality for one group? Or any other reason?	**Yes**		The potential for adverse impact has been assessed as low and will be minimised through appropriate Standard Operating Procedures, familiarisation with the equipment and software capabilities and supported by a Communications Strategy. The policing benefits include the prevention and detection of crime, protecting the communities and providing reassurance to our communities through the use of technology to assist policing for the better.

18. **Are these concerns raised in 8 – 17 potentially going to have a high/medium or low impact (prior to any mitigation)?**	**LOW**		Potential differential impact is anticipated to be low. Data storage and usage will comply with MOPI and Data Protection requirements. All footage will be stored for a minimum of 31 days and can be viewed in alignment with existing FOI legislation. Captured footage can be dip sampled to ascertain the impact of AFR roll-out to identify and manage any differential impact not previously anticipated.

20. Should the Programme proceed to a full impact assessment	NO	If Yes, is there enough evidence to proceed to a full EIA	Yes / No	N/A
Date on which Full impact assessment to be completed by:		N/A		

Signed (completing officer)_____   (Lead Officer)_____