

Retrospective Facial Recognition in the Police National Database

NPCC PND Equality Impact Assessment

What is an Equality Impact Assessment?

An Equality Impact Assessment (EIA) is a tool for identifying potential discrimination because of your new or existing product, project, policy or practice. It makes sure we comply with the duty to show 'due regard' under the Equality Act 2010 and involves assessing the likely (or actual) effects of projects, policies or practice on people in respect of their protected characteristics. This includes looking for opportunities to promote equality that may have previously been missed or could be better used, as well as negative or adverse impacts that can be removed or mitigated, where possible.

Why complete an EIA?

The Public Sector Equality Duty (Equality Act 2010) requires us to show 'due regard' to equality in every part of our work. Completing an EIA is a helpful way to monitor our thinking and actions to ensure the product reflects inclusivity, equal opportunity and equal access to services. 'Due regard' relates to the General Duty, this requires public authorities, in the exercise of their functions, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act
- Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic
- Foster good relations between people who share and people who do not share a relevant protected characteristic

Completing an EIA is a helpful way to monitor our thinking and actions to ensure the product reflects inclusivity, equal opportunity and equal access to services.

What are the benefits?

Keeping a record of our assessment provides valuable evidence of what has been done to give due regard to equality, what evidence has been considered, what decisions have been made and why. This helps us assure ourselves that we have considered our duty properly. We can evaluate the outcomes of our decisions and whether our assessment of the equality impact was correct. The duty is a continuing duty, and so we will take account of new evidence as it arises.

Equality Impact Assessment

Title:	Retrospective Facial Recognition within the Police National Database
Department Responsible:	NPCC PND Portfolio
Completed by:	NPCC PND Team / Equality Advisor (NWP)
On behalf of:	NPCC PND Team Manager

Version:	Date:	Amended by:	Record of Change
V1.0	09.01.25	Equality Advisor	Document created with the intention of gathering relevant information from the Full EIA to explain the current position regarding RFR and the sensitivity of the algorithm.
V2.0	13.02.25	Equality Advisor	A reordering of the content to ensure new readers more effectively understand the timeline of events and reasons for decisions made.
V3.0	10.04.25	NPCC Business Development Manager	HMICFRS report considered and added as a new source of information.
V4.0	26.08.25	NPCC Business Development Manager	Response to LFR deployment by MPS at Notting Hill carnival considered
V5.0	25.11.25	NPCC Business Development Manager	Record monitoring and engagement activity with Police Forces and NPCC PND Lead review of the algorithm setting.
V6.0	05.6.26	NPCC Business	Review of EIA following NPCC PND Lead review of algorithm setting.

		Development Manager	
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A brief description of the Retrospective Facial Recognition within PND

The Police National Database (PND) provides a Retrospective Facial Recognition (RFR) function by searching through facial images within the database. This Equality Impact Assessment will focus on the current facial algorithm used to complete facial searches within the PND.

The PND does not provide Live Facial Recognition (LFR) or Officer Initiated Facial Recognition (OIFR).

The retrospective facial search function is used after a crime has been committed or after an incident requiring a police response.

A facial search can only be used solely for a policing purpose, as described in the PND Code of Practice 2010.

- a) protecting life and property
- b) preserving order
- c) preventing the commission of offences
- d) bringing offenders to justice
- e) any duty or responsibility of the police arising from common or statute law.

The facial search function within the PND provides investigators an opportunity to promptly identify unknown individuals who are a risk to the public, have committed a criminal offence or are at risk of harm.

It is an effective aid for investigators, helping to safeguard victims, improving the timeliness of investigations and preventing further offending.

Post-event use of retrospective facial searching compares still images, (probe image), of unknown people against a reference image held within the PND.

The probe image could originate from CCTV, mobile phones, doorbell cameras, social media and other devices and will contain the face of an unidentified person suspected of a crime, disorder or who is believed to be at risk or a risk to the public.

A trained PND user will complete a facial search by uploading the probe image of the unidentified person into the PND and the database will search the probe image against reference images stored in the PND.

The reference images are police custody images.

Police custody images are taken from people when there is a power under Section 64A of the Police and Criminal Evidence Act 1984, the power to take photographs of individuals detained at a police station, either with consent or, if consent is withheld or impractical to obtain, without it.

PND facial searches are only conducted when there is policing purpose, as listed above, and a PND user or an investigator has decided the search is justified and necessary to aid an investigation.

PND facial search is a tactic focused on identifying unknown people who the police suspect of a crime or who have been involved in an incident and there is a need to identify them.

PND facial search is not used as a mass surveillance tool; it is used as a proportionate and necessary response to a crime or incident where other means have been unable to identify a suspect of a crime or a person who is or at risk from harm.

Each facial search must be justified by the PND user who has decided to use it. The justification is recorded for each PND search and will include a local reference number for the connected investigation or incident and the PND users' rationale.

Each facial image, (probe or reference image), is analysed by software when it is uploaded into the PND. Key points on the face are pinpointed, (such as the eyes, ears, nose, and chin), and are allocated a numerical value.

When a PND user initiates a facial search, the algorithm uses the numerical values to assess and measure the separation of facial features in the probe and reference images.

Visibly different people can be returned as possible matches to the probe image due to the search algorithm using numerical values rather than visible differences.

The PND user receives a list of possible matches indicating that facial images within the database could be a possible match to the face in the probe image.

The list of possible matches could contain images that when viewed are clearly not the person in the probe image.

Due to this known issue, additional safeguards are applied by the trained PND user and the investigator to ensure the list of possible matches are visually assessed and managed appropriately.

This ensures no operational decisions which will impact on people's human rights are made solely based on technology.

Additional Safeguards

The following additional safeguards have always been in place for facial searching.

A visual examination of the list of possible facial matches is completed by the trained PND user and the investigator, as the list could contain images of people who are clearly not the person in the probe image.

A person, (PND user or investigator), decides if a facial image, (custody image), provided by the PND facial search is a potential match to the face of the person in the probe image.

If a trained PND user or an investigator decides a facial search on PND provides the potential identity of a suspect, additional lines of enquiries must be undertaken as PND facial search results do not provide confirmation that a probe image exactly matches a reference image.

PND facial search results cannot be used as evidence of identification, Code D Pace 1984 must be followed for formal identifications alongside other viable lines of enquiry.

Access to the PND is provided through a managed licence model to ensure use is restricted to trained PND users who are vetted appropriately and require access for their policing role.

Access and use of the PND is not available to all Police Officers and Police staff.

Each PND facial search function must be justified and searches are audited to monitor use and the decision making of the PND user.

These additional safeguards along with the requirements of Code G Police and Criminal Act 2012, significantly reduce the risk of a person, who is clearly not the person in the probe image, being wrongfully arrested or other direct action being taken against them.

Sources of Information Considered

Home Office test report - PND Facial Search Accuracy and Racial & Gender Bias 17th June 2022

Following an update to the algorithm used within facial searching in 2021 it was tested in 2022 for facial search accuracy and racial and gender bias. The key findings from the testing were:

- The 2021 update saw a 51% decrease in the number of images that were retrieved as matches. Whilst there was a decrease in the number of matches, the accuracy of matches increased, suggesting better quality image matching taking place and a consequent reduction in false positives. This resulted in a 7-fold increase in true positive matches that were retrieved by the 2021 algorithm compared to the 2016 version.
- False positive ethnicity matches decreased by 71%.
- In relation to gender, improvement in true positive matches could be seen for both males and females. The results saw a 9x increase in true positive matches for females, and a 6x true positive increase for males.
- Even when images were classed as poor quality in terms of lighting, aspect and definition, multiple true positive matches were retrieved, evidencing the 2021 algorithm's improved capability of processing, and matching low quality images.

The testing used images taken from investigations and PND users to inform the findings.

The test reported; 'False positive differentials are much larger than those related to false negatives and exists broadly across most of the algorithms they tested, with false negatives tending to be more algorithm specific. While it found in general false positives were higher in women than men, with respect to race this varied depending on the location of the developer as a proxy for the race demographics of the data they used in training.'

Test report (dated August 2024), produced by The National Physical Laboratory

The National Physical Laboratory were commissioned by the Home Office in collaboration with the Office of the Police Scientific Adviser (OPCSA). Test assessed the current PND algorithm used for facial searching for equitability (bias). The summary findings are included below under 'Overall assessment.'

PND Manual of Guidance V3.9

This document provides guidance on the use of the facial search function and is a national document available to all PND users, Forces and Agency leads.

College of Policing (CoP) Police National Database Search user learning programme module plan, (version 12.4. September 2024).

The plan details the information provided to PND users within PND user training.

PND Data Processing Impact Assessment

Provides an assessment of the data processing within PND and how the risk of processing facial images is mitigated.

Code of Practice on the operation and use of the Police National Database (March 2010)

The purpose of the code and associated guidance is:

- a) to promote the lawful and consistent use of the PND and the information obtained from it.
- b) to ensure that chief officers adopt practices for the use of the PND and the information obtained from it in order that such information is used effectively for policing purposes.
- c) to ensure that the operation of the PND complies with data protection and human rights legislation; and
- d) to ensure that the PND is not used in a way which is discriminatory or otherwise unfair to anyone based on their age, race, ethnicity, any faith or belief, gender, gender identity, sexual orientation or any disability.

The Queen (on the application of Edward Bridges) (Appellant) v The Chief Constable of South Wales Police (Respondent) & others [2020] EWCA Civ 1058

<https://www.judiciary.uk/wp-content/uploads/2020/08/R-Bridges-v-CC-South-Wales-ors-Press-Summary.pdf>

Court of Appeal – Bridges v Chief Constable of South Wales Police

<https://www.judiciary.uk/wp-content/uploads/2020/08/R-Bridges-v-CC-South-Wales-ors-Judgment.pdf>

FRA European union agency for fundamental rights – FRT: Fundamental rights considerations in the context of law enforcement

[Facial recognition technology: fundamental rights considerations in the context of law enforcement | European Union Agency for Fundamental Rights](#)

Press Article published by The Guardian

<https://www.theguardian.com/uk-news/2024/dec/08/police-unlawfully-storing-images-of-innocent-people-for-facial-recognition>

Audit and Performance data received from Forces

This will be included within relevant sections of the EIA and will be monitored through the PND National Steering Group, PND Regional User Groups and within Police Forces and Law Enforcement Agencies. The national, regional and local governance will oversee, assess, audit and monitor performance ensuring the facial search function is being used appropriately, aligned to College of Policing Training, national and local direction.

At the PND National Steering Group on 27th November 2025, chaired by the NPCC PND lead Forces reported their compliance with the College of Policing training, PSED obligations and provided monitoring data. No Forces reported any adverse incidents, (a person being wrongfully arrested because of a PND facial search).

HMICFRS – Crime Investigations – Inspection into how effectively the police investigate crime – published 27th March 2025

[An inspection into how effectively the police investigate crime - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services](#)

Relevant extracts;

'Using technology in crime investigations Forces are increasing their use of IT, but lack of knowledge and incompatible systems are hindering further progress. An example of the IT available to forces is the Police National Database (PND), which holds records from more than 55 agencies, including police forces in England and Wales, the Police Service of Northern Ireland (PSNI) and Police Scotland. The PND holds more than 6.2 billion searchable records and is an invaluable tool for all investigators.

However, its use varies considerably between forces. In our fieldwork, we found that forces didn't use PND facial searching as much as they could. This was often due to a lack of knowledge of its capabilities and a misunderstanding of the benefits it can bring to an investigation. We also found that some forces promoted its use more than others. We heard about the steps the NPCC is taking to improve awareness of the PND. However, there needs to be a national awareness campaign to make sure the benefits of the PND reach all relevant officers and staff.

Recommendation 7 *By 30 June 2025, chief constables should include in their investigation policies a direction stating that when an image exists, investigators should search it against the Police National Database and any other relevant databases before their force closes an investigation.*

Recommendation 8 *By 31 December 2025, the Home Office and the National Police Chiefs' Council lead for the Police National Database should help forces improve officer and staff awareness of the Police National Database's capabilities, in particular facial searching.*

Letter to Metropolitan Police Service, MPS, Commissioner from racial justice and human rights groups expressing significant concern over the decision to deploy live facial recognition at the Notting Hill Carnival – published 14th August 2025

[Letter-to-Sir-Mark-Rowley-re-facial-recognition-at-Notting-Hill-Carnival.pdf](#)

Whilst PND **does not** use LFR it is important to review the content of the letter and address the concerns raised by the signatories, from a PND facial search perspective.

PND facial search is not a mass surveillance tactic and it does not treat all people as potential targets.

It is only used after a crime or an incident has happened. PND facial search is focused on identifying a person who the police suspect of a crime or who has been involved in an incident where the police have responded and need to identify people.

Only the 'probe image', (as an example a CCTV image which has captured the suspect of a crime), is searched in PND and it is searched against lawfully obtained police custody images, not a database of images gained from members of the public in public areas. This significantly reduces the collateral intrusion on members of the public.

Each PND facial search must be justified based on the investigation for which it is being used. Its use must be necessary and proportionate which is why it is used to help identify people where other means have failed to do so. As an example, where witnesses or local police officers have been unable to recognise a suspect at a scene of a crime.

Bias in facial technology is well documented and known which is why the PND established and uses additional human safeguards.

The NPCC PND lead and the College of Policing have always recognised the importance of using trained officers and staff within the facial search process to ensure the technology aids but does not solely influence investigative and operational decisions.

PND facial search does not direct a police officer to arrest or speak to a person. As a post event tactic, investigating officers and staff have time to carefully consider the value of the results from the search, discount images which are clearly not the person in the probe image and decide what action is to be taken, if a possible match to a known person has been found.

A possible match to a known person in PND, is a match to a person who has previously had an image lawfully taken when in police custody and their custody image has been loaded into the database.

Therefore the number of people being searched on the database are restricted to people who are suspected of committing a crime, who are a risk to the public or at risk, (probe images), or people who have had their facial image previously captured under Section 64A of the Police and Criminal Evidence Act 1984, within police custody procedures, (reference images).

This significantly reduces the risk of collateral intrusion on members of the public.

Investigating officers and staff assess the possible match alongside other information, evidence and intelligence which has been gained during their investigation, before making their decision on what, if any, positive action will be taken.

One of the main differences between LFR and PND facial search is that the decision to use PND facial search is informed by the merits of each investigation or policing need and is only used when the police can justify its use to help identify an unknown person. PND facial search is not used as a mass surveillance tool and it does not direct officers within live time situations.

Understanding the bias in facial algorithms, the potential impact on people with specific protected characteristics and ensuring the additional human safeguards are robust allows the PND facial search to be operated at a level which improves how we protect the public, vulnerable people, groups and communities.

PND facial search is an effective tool to aid investigators, officers and staff. It speeds up the time it takes to identify unknown people who are involved in crime, who are at risk or a risk to the public.

Knowing the possible identity of a suspect provides police officers and staff with intelligence which when used with other information, evidence or intelligence, could lead to a prompt arrest or an intervention to safeguard victims, the public and prevent further offending.

Initial assessment of the potential for impact

In summary the findings of the test report (dated August 2024), produced by The National Physical Laboratory, are:

- The current algorithm works very well on high quality images like custody images, candid pictures and selfies. At the current setting used by police, 99.8% of searches included a match. For lower quality images from CCTV and of people in the background of pictures, searches including a match were 8.2% and 56.2%, respectively.
- The algorithm is equally likely to return the correct match in a search response at the setting used by police. This means if a person is female or male, old or young, Black, White or Asian, the algorithm is equally likely to find them in the database.
- However, the algorithm is more likely to suggest false positives if the searched image shows someone who is:
 - Female rather than male
 - Black rather than Asian or White
 - Under 41 rather than over 41
 - Meaning younger Black women are more likely to be the result of a false positive.

Images of people in groups with these characteristics are also more likely to be incorrectly displayed by the algorithm.

Actions taken to mitigate these impacts:

Training:

Established training delivered by the College of Policing, CoP, informs PND users the match-score response on facial searches is based upon how closely the templates of the probe image and the relevant gallery images match and not necessarily how likely the two images are to be of the same person.

Extract from CoP Police National Database Search user learning programme module plan, (version 12.4)

Matching is then applied during a facial search to find images already held on the PND that may match or have a similar template to the probe image. The match-score response on facial searches is based upon how closely the templates of the probe image and the relevant gallery images match and not necessarily how likely the two images are to be of the same person. Facial Search in the PND cannot say for definite if the 2 images are of the same person but instead suggests potential matches.

The facial search results returned are for those images that have the same reference number assigned to them (i.e., that also contain the same measurements between the various points on the face). This can explain why in some cases female images can be returned for searches on a male image and vice versa, or persons of a different ethnicity.

CoP training informs PND users that facial search results are not evidential, must be treated as intelligence, must be checked visually, used in conjunction with other lines or enquiry and national and local identity procedures.

All PND users must be vetted to the appropriate level, attend and pass the CoP training course before they can access the PND or use the facial search function.

CoP training product focussed on facial searching has been reviewed, published and shared with Police Forces and Law Enforcement Agencies in November 2024 re-enforcing the need to visually check potential images matched on PND.

The College of Policing review training material annually or when required through changes in functionality, legislation or business rules.

National Guidance:

PND Manual of Guidance, MOG, provides PND users and Police Forces guidance on the use of facial searches and how potential matches must be managed. MOG aligns to training and direction provide by the CoP. The direction in the MOG is used to inform Police Forces and Law Enforcement policies and processes on the operational use of the facial search function.

The MOG states facial search results must be treated as intelligence, visually checked by the trained PND user and be assessed and developed by the lead investigator before positive action is taken.

Scenarios are provided to offer guidance, example below:

Where an investigator has an image (probe image) of a suspect believed to be involved in a crime and their identity is unknown, a PND facial search should be completed by a trained PND user.

The investigator and PND user must visually assess the results from the PND facial search and decide if they provide further lines of enquiry.

If an investigator decides a facial search on PND provides the potential identity of a suspect, other lines of enquiries must be undertaken, as the PND search result is not evidential.

PND facial search results must be treated as intelligence, Code D Pace must be followed for formal identifications alongside other viable lines of enquiry.

Police Force and Law Enforcement Agencies:

The MOG directs each Police Force and Law enforcement agency to provide guidance to their PND users on the appropriate use of facial searching in support of their operational responsibilities.

local guidance must align to CoP training and national guidance. Police Forces and Law Enforcement agencies have nominated PND leads for accountability and to connect and report into the Regional and National PND governance.

Oversight, Monitoring and assessment:

Use of facial search function is assessed and monitored at the quarterly PND National Steering Group, (NSG), chaired by the NPCC PND lead. Performance data is provided to assess the effectiveness of the facial search function.

Through the PND Regional User Groups, Police Forces and Law Enforcement Agencies will provide data to the NSG on how PND users are using the facial search function and report any adverse incidents. This data will be used to check PND users are following the CoP training, national and local guidance.

Facial searches on the PND are audited to monitor appropriate use with results being assessed and overseen by Force leads and the NPCC PND lead.

HMICFRS are engaged and have been directed to complete a thematic review of Retrospective Facial Searching across several Forces and Law Enforcement Agencies.

Technical Considerations

The Home Office are considering technical options to replace or enhance the facial algorithm used in PND. At the time of writing the outcome of the considerations are not known.

In October 2024, the NPCC PND lead directed the facial algorithm threshold to be increased.

This change in the threshold setting reduced the likelihood of a false positive being returned to 1.2%. The change significantly reduced the impact of bias across protected characteristics of race, age and gender but had a significant negative impact on operational effectiveness.

Operational feedback following an increase in algorithm sensitivity:

Following the increase in sensitivity of the facial algorithm, several unintended consequences were evidenced by Force leads and PND users.

Ongoing performance monitoring and feedback from Police Forces demonstrated a significant detrimental impact on the operational effectiveness of the facial searches which increased the risk to the public and vulnerable groups.

Feedback from Force PND Leads

The Home Office and the NPCC PND portfolio received feedback from Force PND leads, which demonstrated a significant reduction in operational effectiveness when the threshold of the algorithm was increased.

The reduction in operational effectiveness saw a significant drop in the number of facial searches providing possible matches. When the facial algorithm operated at the original setting, 56.3% of searches provided possible matches, this reduced to 14% when the algorithm was increased.

Police Forces provided an assessment of the operational impact of the increase, demonstrating that a once effective tactic, returned results of limited benefit, increasing the risk to the public.

The risk to the public safety was increased because the facial algorithm, (when threshold was increased), was not providing investigators with facial search results that could expedite investigations by helping to promptly identify unknown offenders. This could mean dangerous offenders would continue to offend, putting the public at an increased risk.

Response

The NPCC PND lead reviewed and considered the information supplied in the NPL test, feedback from Police Forces, the operational and public safety impact and the effectiveness of the additional safeguards.

They were reassured the established additional safeguards considerably reduced any potential bias of the algorithm and no adverse incident; a person being wrongfully arrested due to the incorrect handling of a possible match using PND facial search had ever been reported.

Due to the detrimental impact to operational effectiveness caused by the significant reduction in the number of investigative leads available to UK law enforcement and the direct increased risk to communities including the most vulnerable, the NPCC PND decided to reduce the setting of the algorithm.

The NPCC PND lead directed that this decision will be under constant a review.

The NPCC PND lead reviewed the algorithm setting in October 2025 and was satisfied that the setting continued to be operationally effective and the additional safeguards reduced the risk of the wrong person being subject of an investigation.

The NPCC PND lead reviewed the algorithm setting in June 2026 and was satisfied that the setting continued to be operationally effective and the additional safeguards reduced the risk of the wrong person being subject of an investigation. No adverse incidents have been reported by Police Forces.

Actions to mitigate potential impact continued:

Communications:

National direction, guidance and training material is published and shared to Police Forces and Law Enforcement Agencies by the College of Policing, Home Office and the NPCC PND portfolio.

Online portals are used to store material to ensure they are accessible to practitioners in support of their operational responsibilities

The NPCC PND lead informs Chief Constables on relevant changes to the PND algorithm, re-affirming the importance of following the College of Policing training and national guidance for the effective use of PND facial search.

The NPCC PND lead briefed Chief Constables Council in July 2025 receiving support for Forces to consider their requirements of the Public Sector Equality Duty (PSED), to put in place systems to eliminate discrimination, advance equality of opportunity and foster good relations between those who have protected characteristics. Also, to reinforce the findings of:

The Queen (on the application of Edward Bridges) (Appellant) v The Chief Constable of South Wales Police (Respondent) & others [2020] EWCA Civ 1058

<https://www.judiciary.uk/wp-content/uploads/2020/08/R-Bridges-v-CC-South-Wales-ors-Press-Summary.pdf>

and the subsequent appeal:

Court of Appeal – Bridges v Chief Constable of South Wales Police

<https://www.judiciary.uk/wp-content/uploads/2020/08/R-Bridges-v-CC-South-Wales-ors-Judgment.pdf>

In the Court of Appeal these are the points which were detailed which policing needs to follow to demonstrate due regard under the PSED:

- The PSED must be fulfilled before and at the time when a particular policy is being considered.
- The duty must be exercised in substance, with rigour, and with an open mind.
- The duty is non-delegable.
- The duty is a continuing one.
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If the relevant material is not available, there will be a duty to acquire it and this will frequently mean that some further consultation with appropriate groups is required.

Provided the court is satisfied that there has been a rigorous consideration of the duty, so that there is a proper appreciation of the potential impact of the decision on equality objectives and the desirability of promoting them, then it is for the decision-maker to decide how much weight should be given to the various factors informing the decision.

Chief Constables Council supported the need to engage with national governance, providing a review of local processes and data to oversee and monitor the appropriate and effective use of facial searching.

A letter from the NPCC lead was sent to all Chief Constables on 22nd July 2025 requiring engagement from Force PND leads to enable delivery of Force EIA's and monitoring.

During September 2025 four national briefings were provided to Police Force leads re-enforcing the College of Policing training, reminding Forces of their PSED obligations and to ensure each Force had effective oversight and monitoring of their use of facial search.

The NPCC PND Lead, NPCC team and Home Office PND programme continue to remind Forces of the requirements to monitor and use PND facial search safely and effectively. Communications are passed through the NSG, RUG's, direct contact and other messaging.

Assessment of potential impact relevant to each Protected Characteristic

Age

Potential Impact: Facial algorithms are more likely to suggest incorrect matches if the searched image shows someone who is under 41 rather than over 41.

Source: The National Physical Laboratory Test results dated August 2024

Potential Impact:

The age of criminal responsibility in the UK is 10 years old. Image capture via Custody Imaging on which Facial searching in PND is reliant, is dependent on the age, date and time at which the custody image was taken. As a child grows and time passes, the accuracy of a facial 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 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.”

Source: The European Union’s Agency for Fundamental Rights ‘Facial Recognition Technology Fundamental Rights Considerations in the Context of Law Enforcement Report 2019

Actions to mitigate impact:

Training: Established training delivered by the CoP, refreshed through accessible continuous professional development training material

National Guidance: NPCC PND lead direction and PND Manual of Guidance

Police Force and Law Enforcement Agencies: Effective Local policy and processes

Monitoring and Assessment: National, Regional and Local governance to audit and monitor the use of facial search

Communications: To Forces reinforcing the requirement of the Public Sector Equality Duty, to review and monitor local processes to ensure national training and guidance is followed.

Additional human safeguards: Ensure the additional safeguards are followed to ensure technology does not solely inform operational decisions. These additional safeguards have always been in place for facial searching and are established operation practice.

Disability

Potential Impact: People are visibly different, and this can change through their lives. They may be born with a visual difference, such as a facial disfigurement, or it could occur or develop through their life. This could lead to their facial features being different from those captured in an earlier custody image. Therefore, the custody images held on the PND may not accurately reflect their present facial appearance.

Actions to mitigate impact:

Training: Established training delivered by the CoP, refreshed through accessible continuous professional development training material

National Guidance: NPCC PND lead direction and PND Manual of Guidance

Police Force and Law Enforcement Agencies: Effective Local policy and processes

Monitoring and Assessment: National, Regional and Local governance to audit and monitor the use of facial search

Communications: To Forces reinforcing the requirement of the Public Sector Equality Duty, to review and monitor local processes to ensure national training and guidance is followed.

Additional human safeguards: Ensure the additional safeguards are followed to ensure technology does not solely inform operational decisions. These additional safeguards have always been in place for facial searching and are established operation practice.

Gender Reassignment

Potential Impact: Facial searching 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 facial searching may be less effective if changes to facial appearance have occurred between the time the reference image (custody image) was taken, and the time a comparison is made. This may impact persons whose gender identity or gender expression is different from that in the reference image.

Actions to mitigate impact:

Training: Established training delivered by the CoP, refreshed through accessible continuous professional development training material

National Guidance: NPCC PND lead direction and PND Manual of Guidance

Police Force and Law Enforcement Agencies: Effective Local policy and processes

Monitoring and Assessment: National, Regional and Local governance to audit and monitor the use of facial search

Communications: To Forces reinforcing the requirement of the Public Sector Equality Duty, to review and monitor local processes to ensure national training and guidance is followed.

Additional human safeguards: Ensure the additional safeguards are followed to ensure technology does not solely inform operational decisions. These additional safeguards have always been in place for facial searching and are established operation practice.

Marriage & Civil Partnership	
The use of Retrospective Facial Recognition in the Police National Database has been reviewed in respect of this area and no perceived impacts or disproportionate effects have been identified.	
Pregnancy & Maternity	
The use of Retrospective Facial Recognition in the Police National Database has been reviewed in respect of this area and no perceived impacts or disproportionate effects have been identified.	

Race and Ethnicity

Impact: Facial algorithms are more likely to suggest incorrect matches if the searched image shows someone who is Black rather than Asian or White. When demographics are combined, Black females are more likely to generate false image matches than Black males.

Source - The National Physical Laboratory Test results dated August 2024

Actions to mitigate impact:

Training: Established training delivered by the CoP, refreshed through accessible continuous professional development training material

National Guidance: NPCC PND lead direction and PND Manual of Guidance

Police Force and Law Enforcement Agencies: Effective Local policy and processes

Monitoring and Assessment: National, Regional and Local governance to audit and monitor use of facial search

Communications: To Forces reinforcing the requirement of the Public Sector Equality Duty, to review and monitor local processes to ensure national training and guidance is followed.

Additional human safeguards: Ensure the additional safeguards are followed to ensure technology does not solely inform operational decisions. These additional safeguards have always been in place for facial searching and are established operation practice.

Advice provided to inform PND users on how to use search criteria to focus facial search based on sex and ethnicity.

Religion and Belief

Potential Impact: Facial algorithms can be impacted by people wearing facial or head coverings that hide facial features. People who have a religion or a belief where face or head coverings are routinely worn could be indirectly impacted. As an example, the police could be investigating a missing person who is wearing a facial or head covering which could affect the effectiveness of the PND facial search. This could lead to a delay in locating the missing person, increasing the risk to them or others.

Actions to mitigate impact: Facial algorithm is proven to be effective even when facial or head coverings are worn, however this indirect risk cannot be fully removed.

Training: Established training delivered by the CoP, refreshed through accessible continuous professional development training material

National Guidance: NPCC PND lead direction and PND Manual of Guidance

Police Force and Law Enforcement Agencies: Effective Local policy and processes

Monitoring and Assessment: National, Regional and Local governance to audit and monitor use of facial search

Communications: To Forces reinforcing the requirement of the Public Sector Equality Duty, to review and monitor local processes to ensure national training and guidance is followed.

Additional human safeguards: Ensure the additional safeguards are followed to ensure technology does not solely inform operational decisions. These additional safeguards have always been in place for facial searching and are established operation practice.

Sex

Potential Impact: Facial algorithms are more likely to suggest incorrect matches if the searched image shows someone who is female rather than male. When demographics are combined, black females are more likely to generate false image matches than Black males.

Source: The National Physical Laboratory Test results dated August 2024

Actions to mitigate impact

Training: Established training delivered by the CoP, refreshed through accessible continuous professional development training material

National Guidance: NPCC PND lead direction and PND Manual of Guidance

Police Force and Law Enforcement Agencies: Effective Local policy and processes

Monitoring and Assessment: National, Regional and Local governance to audit and monitor the use of facial search

Communications: To Forces reinforcing the requirement of the Public Sector Equality Duty, to review and monitor local processes to ensure national training and guidance is followed.

Additional human safeguards: Ensure the additional safeguards are followed to ensure technology does not solely inform operational decisions. These additional safeguards have always been in place for facial searching and are established operation practice.

Advice provided to inform PND users on how to use search criteria to focus facial search based on sex and ethnicity.

Sexual Orientation

The use of Retrospective Facial Recognition in the Police National Database has been reviewed in respect of this area and no perceived impacts or disproportionate effects have been identified.

Secondary / Intersectional Impacts

The Test report (dated August 2024), produced by The National Physical Laboratory, commissioned by the Home Office in collaboration with the Office of the Police Scientific Adviser (OPCSA) reported an impact when three protected characteristics were combined. These were age, (under 41 rather than over 41), race (Black, rather than White or Asian) and sex (female

rather than male). The test showed that an image of a Black female under the age of 41 was more likely to be returned as a false positive on a facial search than any other characteristics.

Actions to mitigate intersectional impact

Training: Established training delivered by the CoP, refreshed through accessible continuous professional development training material

National Guidance: NPCC PND lead direction and PND Manual of Guidance

Police Force and Law Enforcement Agencies: Effective Local policy and processes

Monitoring and Assessment: National, Regional and Local governance to audit and monitor the use of facial search

Communications: To Forces reinforcing the requirement of the Public Sector Equality Duty, to review and monitor local processes to ensure national training and guidance is followed.

Additional human safeguards: Ensure the additional safeguards are followed to ensure technology does not solely inform operational decisions. These additional safeguards have always been in place for facial searching and are established operation practice.

Advice provided to inform PND users on how to use search criteria to focus facial search based on sex and ethnicity.

Declaration:

The following Equality Duties have been considered in identifying the impacts above:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance the equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Monitoring:

The original Full Equality Impact Assessment (separate document) will remain under review by the NPCC PND Team. Any change / addition to that assessment may require an update to this narrative document. The EIA will be monitored no less than quarterly in the first instance and will take account of the views of the Home Office, NPCC PND Team and Force PND Leads. Following an agreed period, the assessment will be monitored as a 'live document' at least annually.

Approval and sign off:

An initial DRAFT of this narrative document was completed by:

Author:	Equality Advisor (NWP)	v1.0:	09.01.24
Author:	Equality Advisor (NWP)	v2.0:	13.02.25
Author:	NPCC PND Team	V3.0	10.04.25
Author:	NPCC PND Team	V4.0	29.08.25
Author:	NPCC PND Team	V5.0	28.11.25
Author:	NPCC PND Team	V6.0	05.06.25

On behalf of:

Policy Owner:	NPCC PND Manager	Date:	23.06.26 V6
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