



Western Australia Police Force

Equality Impact Assessment

(Overt) Live Facial Recognition Trial

Technology Portfolio

Innovation Division

May 2026

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INTRODUCTION

This Equality Impact Assessment supports the WA Police Force's commitment to diversity, equity, and inclusion by embedding equality considerations into the Overt Live Facial Recognition (LFR) trial. It assesses actual and potential impacts on people with protected characteristics and identifies controls to prevent or reduce disproportionate impacts, improve accessibility, and strengthen community trust.

This Assessment ensures that each deployment of LFR is lawful, necessary, proportionate, transparent, and supported by mitigations that minimise harm and advance equality where possible.

Whilst this Assessment directs consideration for each deployment, it does not restrict further mitigation strategies being applied should the Applicant or Authorisation Officer (AO) direct as appropriate.

In compiling this Assessment various materials have been used including reference to the practical experience of police forces in the United Kingdom (UK) and associated documents, including:

- National Physical Laboratory (NPL) Equitability Study on facial recognition technology in law enforcement.
- National Institute of Standards and Technology (NIST) facial recognition evaluation reports.

In addition, consultation has occurred with WA Police Force internal stakeholders including, Cultural Engagement & Events Division, Information Management, Legal Services and by reference to relevant WA Police Force policies and procedures.

Engagement with key external stakeholders will occur before and on an ongoing basis during the LFR trial, including Local Government, Community Groups, Business sector, and other interested groups.

OVERT LIVE FACIAL RECOGNITION

Deployment of LFR is for the purpose of crime prevention, law enforcement, public safety, and safeguarding the community. For example, locating persons who may pose a risk to themselves or public safety, such as persons sought for the commission of offences, missing or vulnerable people, or those subject to court orders or other lawful restrictions.

All deployments of LFR will be compliant with the law and WA Police Force policies and procedures, which ensure deployments are necessary, proportionate, transparent, and ethical.

LEGAL AND POLICY COMPLIANCE

All deployments will comply with applicable discrimination, disability access, and inclusion obligations, and will be planned and conducted to avoid discrimination and to remove or reduce barriers, including:

- Legislative compliance
- Relevant WA Police Force Policies, Police Manuals and Code of Ethics
- Government Codes of Practice, e.g., Western Australian Multicultural Policy Framework
- Privacy and data security requirements, e.g. *Privacy and Responsible Information Sharing Act 2024*

LFR deployments are designed to avoid reinforcing systemic disadvantage or exclusion and ensure they will not directly or indirectly discriminate against persons with protected attributes and to ensure officers will exercise their powers without discriminatory selection or impact.

Feedback and complaints pathways are accessible through multiple channels (online, phone and in-person options), with language and accessibility supports available where needed. Concerns relating to discrimination will be managed in accordance with legislative and policy requirements, with tailored

support for people who may face barriers to reporting. Procedures include supporting Culturally and Linguistically Diverse (CaLD) communities by considering cultural norms and trust impacts during interactions and using interpreters where required to ensure procedural fairness.

IMPACT ASSESSMENT AND MITIGATION ACTION PLAN

The WA Police Force has assessed the potential impact of LFR on community groups, describing each potential impact and actions to minimise adverse impact or advance equality of opportunity.

The Mitigation Action Plan (Annexure 1) sets out the details of the potential impacts and mitigation actions the WA Police Force will action. The following compulsory mitigation actions apply universally to all deployments and across all protected characteristics. These measures are implemented as standard controls to ensure lawful, ethical, and proportionate use of LFR:

- **Technology Controls and Threshold Settings** - LFR systems operate using independently validated, high match thresholds to minimise false positives and reduce demographic variation or bias. A threshold will be applied, consistent with recommendations from the UK police force learning and NPL; this is a universal technical mitigation that stabilises performance across demographic groups. System performance is continuously monitored by operators, with deployments halted immediately if degradation or anomalies are identified.
- **Human Review and Officer Discretion** - LFR does not constitute identification. Every alert must be subject to human review and confirmation by a trained police operator and a police officer (engagement officer) before any action is taken. This safeguard applies to all demographics and prevents automated decision-making, mitigating risks associated with algorithmic bias, outdated imagery, appearance changes, head coverings, and disability related facial differences.
- **Alert List Governance** - Alert-lists will be compiled using the most recent and highest quality images lawfully obtained and available, and, where practicable, no more than 24 hours prior to deployment. Categories for inclusion on an Alert-list are authorised through a process applying necessity and proportionality, with enhanced authorisation requirements for persons aged under 14 years.
- **Operational Safeguards and Deployment Controls** - Deployment locations and timing will carefully consider sensitive environments, including schools, places of worship, and medical facilities, to prevent unintended disproportionate impacts on specific communities. Engagement officers will be briefed prior to deployment, with emphasis on system limitations, bias awareness, and diversity considerations, and will positively engage the public to explain the LFR purpose and operation.
- **Accessibility and Inclusion Measures** - Deployments will use accessible, plain-English public information and signage (large print, high contrast, and clear layouts), with links to further information. These measures support accessibility and inclusion, including people with disability, young persons, religious communities, and non-English speakers.
- **Transparency and Public Notification** - LFR use is overt and transparent. Deployment information will be published through appropriate channels (e.g. websites and social media), with clear signage at deployment sites. Engagement officers will be available to explain the technology and respond to public enquiries. Transparency supports informed choice and public confidence.
- **Data Minimisation and Retention** - Biometric templates generated for non-matches will be deleted immediately. Data retention is permitted only where a match occurs. This ensures parity across all demographics and limits unnecessary biometric processing.
- **Post Deployment Review and Continuous Monitoring** - All deployments will be subject to a post deployment review, including analysis of false alerts, demographic patterns, system performance, and community impact. Findings will be reported to appropriate oversight groups and used to inform continuous improvement and ethical governance.

- **Community Engagement** - Ongoing community engagement and dialogue will accompany LFR use, particularly with groups that may have heightened concerns or lower trust in policing. Engagement activities support accountability, transparency, and informed public understanding.

MONITORING, EVALUATION AND REVIEW

LFR deployment will be subject to continual monitoring and review through the course of the trial to identify any impacts and enable appropriate adjustment.

This includes:

- Post-deployment reviews after each LFR operation, including equality-related metrics (e.g., Alert-list composition, and alerts).
- Assessment of performance metrics (false alerts, demographic trends) and any perceived over-reliance on the system or automation bias.
- Assessing ongoing compliance with privacy obligations.
- Review of complaints, FOI requests, feedback, and media and community commentary related to an equality perspective.
- Consideration and treatment of any cumulative impact, intersectionality or repeated exposure across protected characteristics or deployment locations.
- Routine review of equality impacts, particularly if there are changes to legislation, technology, and operational practice.

Deployment reports will be provided to the AO, and Applicant to empower action for continuous improvement or to enhance mitigations.

USE OF THE EQUALITY IMPACT ASSESSMENT

The Applicant and AO will assess the circumstances of each proposed LFR deployment against this Equality Assessment. This assessment will demonstrate the deployments will be:

- Lawful – compliant with discrimination and privacy law.
- Necessary - required for a legitimate policing purpose.
- Proportional – the least intrusive means available.
- Equitable – have no unjustified discriminatory impact.
- Accountable – decisions recorded and reviewable.

Based on their assessment the AO will decide whether the deployment will

- Proceed – no significant impact identified.
- Proceed – impacts identified, mitigations sufficient or additional mitigations directed.
- Proceed with caution – residual risks remain.
- Do not proceed - impacts are disproportionate and cannot be adequately mitigated.

All active deployments are overseen by a Police Commander and Police Forward Commander.

ANNEXURE 1 – MITIGATION ACTION PLAN

Protected Characteristic	Potential Impacts	Mitigations (WA Police Force will ...)
<p>Age</p>	<ul style="list-style-type: none"> • Accuracy of facial recognition is reported as lower for younger children, especially under fourteen, and where reference images are several years old. This may lead to missed identifications or, at exceptionally low thresholds, false alerts. • Changes in appearance over time may affect match reliability. • Older people may be less likely to access online transparency information about deployments or find it harder to avoid deployments by alternative routes. • Deployments near healthcare facilities may disproportionately affect older people who attend medical appointments more frequently. • Young children may not understand signage or transparency information. 	<ul style="list-style-type: none"> • Only use recent, good quality images to compile alert lists. • Construct Alert-list as close to deployment as practicable, (e.g., within 24 hours). • Apply a minimum similarity threshold, consistent with independent equitability testing to minimise demographic bias and false alerts. • Require additional authorisation where children under fourteen are added to Alert-lists. • Clear signage and public communications so that children and older people (and their carers) can understand that LFR is in use. • Human adjudication, (operator and engagement officer) • Consider camera placement relating to accessibility of alternative routes. • Include age-related analysis in post-deployment evaluation, such as false alert patterns and Alert-list composition by age band.
<p>Impairment and Disability (incl. sensory, cognitive, mobility)</p>	<ul style="list-style-type: none"> • Facial disfigurement, reconstructive surgery, or progressive conditions may change appearance, reduce accuracy, and potentially increase missed identifications. • Wheelchair users or people with mobility impairments may be disproportionately affected if 	<ul style="list-style-type: none"> • Consider accessibility when selecting deployment locations. • Ensure cameras are positioned to capture faces of people of various heights, including wheelchair users, without discrimination. • Use high contrast, large-font signage, and clear layouts to support those with visual or cognitive impairments.

Protected Characteristic	Potential Impacts	Mitigations (WA Police Force will ...)
	<p>alternative routes are significantly longer or include stairs.</p> <ul style="list-style-type: none"> • Risk of visually impaired people unknowingly entering recognition zone. • People with certain mental health conditions or cognitive impairments may find the presence of LFR or engagement with officers confusing or distressing. 	<ul style="list-style-type: none"> • Brief engagement officers to highlight disability awareness. • Include disability-related feedback in post-deployment reviews.
Gender History (inc. and Reassignment Identity)	<ul style="list-style-type: none"> • Transition-related changes to facial appearance, (e.g., hormonal changes, surgery) may reduce match accuracy where reference images predate transition. • Non-binary and gender-fluid people who vary their presentation may be more affected by reliance on older images. • Concerns about being misidentified because of gender identity may impact trust. 	<ul style="list-style-type: none"> • Recent photos where available. • Engagement officer briefing on respectful engagement, (pronouns, respect, dignity) • Human review of every alert; LFR not used as formal identification. • Officers briefed that changes in gender presentation may affect image similarity. • Monitor deployments for any trends in false alerts or differential treatment linked to gender identity and adjust practice accordingly. • High similarity threshold to minimise bias
Race / Ethnicity	<ul style="list-style-type: none"> • Historic studies of facial recognition systems suggest differential performance by ethnicity, with higher error rates for minority ethnic groups where algorithms not evaluated or configured. • Community perception that LFR disproportionately impacts minority ethnic communities may damage trust and contribute to feelings of over-policing, leading to community tension if deployments perceived as discriminatory. • Care in deployments in areas with demographic profiles. 	<ul style="list-style-type: none"> • Use algorithms independently assessed for demographic equitability that operate at or above defined similarity threshold shown to minimise differentials across ethnic groups. • Ensure that Alert-list inclusion criteria are objective, and do not target any group based on ethnicity. • Undertake community engagement and consult with advisory groups, particularly in Aboriginal, CaLD, or diverse communities.

Protected Characteristic	Potential Impacts	Mitigations (WA Police Force will ...)
	<ul style="list-style-type: none"> Environmental factors affecting accuracy 	<ul style="list-style-type: none"> Pre-deployment assessments will consider minimising the effect of environmental conditions, e.g. camera heights and angles, lighting and glare. Ensure compassion of engagement officers, recognising certain groups may be disproportionately represented in the Alert-list. Monitor Alert-list composition, alerts, arrests and complaints by ethnicity, and act on any disproportionality identified results to review thresholds, Alert-list criteria, or deployment locations. Require applications assess community impact. Transparent communication on deployment purpose. Human verification by officers, reinforcing cultural competence and anti-bias at briefings.
Belief (Religion or Political)	<ul style="list-style-type: none"> Religious head coverings, facial hair, or other attire may partially obscure features and reduce match accuracy. Certain faiths or groups may object to photography or biometric capture on religious grounds. Deployments near places of worship or at times of religious observance may affect attendance if people feel under surveillance or deterred. 	<ul style="list-style-type: none"> Brief engagement officers to use their cultural and religious awareness training and recognise and respect religious practices when engaging individuals. Briefings will reinforce officers who have no general legal power to require removal of religious headwear or coverings solely for passing an LFR system. Consider the proximity and timing of deployments relative to places of worship and religious events, adjusting locations or timings accordingly, having regard to the intent and risk of the deployment. Engage proactively with faith communities, explaining the purpose of LFR, safeguards, and how images are processed and deleted.
Sex / Gender	<ul style="list-style-type: none"> Patterns in offending may mean that Alert-lists contain more men than women, which may be perceived as a disproportionate. 	<ul style="list-style-type: none"> Human adjudication of alerts.

Protected Characteristic	Potential Impacts	Mitigations (WA Police Force will ...)
	<ul style="list-style-type: none"> Changes in appearance (e.g., hairstyle, cosmetics) which could impact match accuracy may occur more frequently among women, potentially affecting true positive or false alert rates. 	<ul style="list-style-type: none"> Configure the threshold at a level that independent testing shows to be equitable across genders and monitor for any emerging differentials. Ensure operators and engagement officers are briefed to review alerts and assess possible appearance changes before engaging. Analyse and monitor data for gender false alerts and sex-disaggregated analysis in post-deployment reporting.
Sexual Orientation	<ul style="list-style-type: none"> No direct technical impacts have been identified that are specific to sexual orientation. Perceptions or fears among LGBTQ+ communities about discriminatory use of emerging technologies, which could affect trust with police. 	<ul style="list-style-type: none"> Communicate clearly that orientation is irrelevant to Alert-list criteria. Adopt a standard equality-based engagement approach. Where appropriate, engage with LGBTQ+ networks to explain LFR use, safeguards and complaint routes and provide assurance that Alert-list inclusion is not based on sexual orientation and alerts are not used to process sexual orientation data.
Pregnancy & Maternity	<ul style="list-style-type: none"> No specific impacts have been identified in relation to LFR technology or deployment for pregnant people beyond the general considerations already covered under mobility, sex, and age. Staff roles may require adjustments 	<ul style="list-style-type: none"> Duty adjustments for staff
Marriage & Civil Partnership (including family status and responsibility)	<ul style="list-style-type: none"> No differential impact related to marital or civil partnership status have been identified. 	<ul style="list-style-type: none"> None required
Other (e.g. socioeconomic, carers, non-English speakers)	<ul style="list-style-type: none"> Digital exclusion or people with lower digital access or literacy may be less likely to see online transparency notices about deployments. Literacy or language barriers reduce transparency effectiveness. 	<ul style="list-style-type: none"> On-site engagement officer explanation; translators where feasible. Use multiple channels (web, social media, signage) to maximise the reach of transparency information.

Protected Characteristic	Potential Impacts	Mitigations (WA Police Force will ...)
	<ul style="list-style-type: none"> • Businesses located within or adjacent to the zone of recognition may experience changes in footfall (positive or negative) when LFR is deployed. 	<ul style="list-style-type: none"> • Consultation with local businesses regarding deployments and monitoring any sustained adverse impacts. • Clear accessible digital content (QR codes). • Advance publication of deployments

Version Control

Version	Date	Author	Change Description
1.0	10/05/2026	Paul Gelmi	