

ETHICS COMMITTEE

Notes of meeting held Wednesday 24 July 2019, 10:00 - 14:00 hrs

Room LH 1.8/LH 1.9, First Floor, Lloyd House, Colmore Circus Queensway, Birmingham, B4 6NQ

Present:

Marion Oswald (MO) Chair

Anindya Banerjee (AB)

Malcolm Fowler (MF)

Jamie Grace (JG)

Janine Green (JGr)

Rebbecca Hemmings (RH)

Jennifer Housego (JH)

Ethics Committee

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Thomas McNeil (TM) Strategic Adviser to the PCC & Board Member (OPCC)

Rachel Skett (RS) Secretariat (OPCC)
Tom Sorell (TS) Ethics Committee

Other Attendees:

Jessica Ansell (JA) Business Support (OPCC) - supporting Ethics Secretariat

Jane Bailey (JB)

Richie Evans (RE)

Davin Parrott (DP)

Chief Inspector (WMP) – presenting

Chief Inspector (WMP) – presenting

Principal Data Scientist – presenting

Chief Superintendent (WMP) – presenting

Observers:

Nick Dale (ND) Superintendent (WMP)

Lara Macdonald (LD) Policy Advisor (Centre for Data Ethics & Innovation)

Lydia Slym (LS) Sergeant (WMP)

Apologies:

Jonathan Jardine (JJ) Chief Executive (OPCC)

Claire Paterson-Young (CPY) Ethics Committee

Louisa Rolfe (LR) Deputy Chief Constable (WMP)

Peter Fussey (PF) Ethics Committee



1 -	The Chair welcomed everyone to the econod formal Ethics Committee meeting
	The Chair welcomed everyone to the second formal Ethics Committee meeting.
2 -	Apologies: Apologies were received from Jonathan Jardine, DCC Louisa Rolfe, Peter Fussey and Claire Paterson-Young.
3 -	(Integrated Offender Management) IOM Model - Interim update and progress report
	DP and RE attended the meeting and provided an overview of the IOM model, as well as an interim update and progress report. It was explained that offender management is about supporting those in the community who have already offended, to help them turn their lives around, reduce offending for the protection of the public and improve their wellbeing. Chief Inspector Jane Bailey (JB) was present to answer any further questions as she is the West Midlands Police (WMP) lead for offender management, and the previous meeting had concluded that the committee needed far more context to understand how the model would be used in practice. The following points were highlighted: When members asked what constitutes 'harm' when considering the
	gravity of an individual's offending, it was noted that the definition of 'harm' is noted in the brief. The model generates a high number of offenders and WMP would be looking to prioritise high and medium risk offenders and identify a potential early intervention opportunity. The offender management team have a very large number of offenders to manage, and support in making informed decisions around risk would help ensure they are providing the right level of support to those who need it. In particular, if the model highlighted some as being higher risk than we realised so we could support them, we would want to know, and indeed we would want to know if the model had identified some as particularly high risk but which we had not graded as high. However, the team would want to really work through how such a model was used in practice, to see how it measures up against their experience and professional discretion, i.e. the degree to which they would be surprised at the proposed model's results, or the degree to which it helped confirm decisions and distinguish in more difficult cases. JB suggested a protocol is developed that identifies the clear selection and de-selection (i.e. those who are not considered to need further offender management support) criteria for those receiving support, how
	any offender that falls within this would be managed, and what support should be provided from neighbourhood policing teams. The latter would be seen as the appropriate level of engagement within communities where individuals are considered lower risk. It is vital for there to be a clear protocol on how the information from the model would be used,



and how this interacts with the discretion and autonomy of the offender managers.

- How is the distinction drawn between gangs and networks within the model? It was established that gangs would be identified as a form of institution, whereas networks are based on crime records and individuals simply being known to each other. Whilst both have commonalities in terms of potentially having an established identity, networks are less established than groups that can be said to be 'street gangs' or separate to that of 'organised criminal gangs', which might be less chaotic than street gangs. Gangs and networks are separate features within the model. It was discussed how future iterations of the model will need to help members understand the applicable features in more detail.
- What is meant by the reference to sentencing guidelines? DP explained that it is a measure used within the harm index. The committee raised the point that this is different from what the actual sentences were and therefore raised a concern over its accuracy as a measure upon which the model relies. DP stated the high correlation between the CCHI and the ONS severity score (which uses average days from actual sentences).
- In practice, how will this model be used? How is professional judgement captured in decisions and how does this work with existing workloads? JB answered that it will be a useful tool for early prevention and offender management because there is no predictive analysis currently, and reiterated the need for a protocol for how the model's outputs will be used alongside professional judgement.
- Is reverse feedback being tried? JB answered that 6k offenders are currently managed but this data generates roughly 48k. WMP wouldn't have the capacity to manage that volume, but it is believed many of them wouldn't need that management. Therefore, thought needs to be given as to how the model provides an output that can be usable in the context in which it would be used.
- Are there any other sources of possible bias that you investigated other than race/ethnicity? DP answered that other biases were looked for but were not detected, and they didn't make it through to the final biases displayed in the appendix, i.e. there were no variables that had predictive value that would have presented bias based on protected characteristics or proxy measures. DP noted that as the model includes interactions, this affects the way in which individual features in the model effect resultant estimated probabilities. DP accepted that the current results could still do with further exploration as, from a non-data scientist perspective, the current results were not necessarily easy to interpret.
- Have you experimented with different cut off values? DP answered that different cut-off points were assessed for predictive stability (presented in the first Committee paper). Experience would help inform appropriate cut off points in terms of where it was appropriate to conclude that individuals did not require offender management support. Once the project was further down the line, they would be able to work with the offender management team to understand how this model is working in practice.



- How have you been testing the model to see how good the predictions are with the projected transitions outlined in the paper, i.e. have you tested the accuracy of the model and how? DP noted that model accuracy was assessed on a test dataset in line with general predictive model building processes (results provided in the first Committee paper).
- Can you simplify some of the explanations of tests for bias provided in the project proposals? DP explained that there was an attempt to provide an intuitive explanation in the papers. Essentially, larger deviations from the line would correlate with different ethnicities. The graphs in Appendix B show there is no correlation between the ethnicity with other variables. It was accepted that the Analytics Lab is learning how to communicate its data science proposals in a way that is accessible.
- How many offenders are currently being managed and how does this fit with high risk offenders? It would be concerning if there were more offenders labelled than WMP could deal with. JB answered that there are 314 offender managers in total, including for sex offenders and high priority/risk offenders. WMP are currently working towards reducing caseloads as typically they are 1-20 but sex offenders can be up to 60. There is some capability in Neighbourhood Policing Units (NPUs) to manage individuals from whom WMP are predicting high levels of harm.
- Is the analysis in Appendix B going to pick up the difference in police approaches such as stop and search under Section 60 or where there is reasonable evidence? It was ascertained that there would be s.60 stop and search data in the existing model, but it did not include the most recent s.60 stop and search results based on the national rise in its use in recent months. The rebuild of the model will look to see the impact of excluding stop and search data where no positive result was found.
- How will qualitative analysis be used to understand how this model would be used by offender managers in practice to ensure they do not simply defer to the model's outputs? DP answered that there will be detailed and on-going analysis of the predictive accuracy of the model, and on-going checks for feedback loops to ensure the model does not inadvertently promote perverse consequences or does not lose its accuracy over time. It was emphasised by the Ethics Committee how important it would be to conduct a qualitative analysis as well as looking at predictive accuracy, as one of the major ethical concerns is that the model would, in time, replace human decision-making.
- It was noted that the committee were pleased to see that the model did not include those who had only been suspects or victims in an investigation.
- What is the next stage? The next stage is a rebuild of the model, followed by the beta testing phase to explore its accuracy in greater detail. It is expected that this next stage requires further Ethics Committee approval.

Action:

The committee suggested that detailed legal advice on the human rights assessment and other means of achieving the objective should be conducted, and that, in time, there should be a randomised control trial to build evidence for the accuracy of the model, as well as an accessible description of how accuracy is tested for and how it will be tested for in the future.



 More information is necessary going forward on how the evidence base for the model will be developed and on how use of sensitive personal data such as drug use and age data will be justified legally.

4 - Explanation of the 'DAL_2019_0001_RASSO_analysis' paper

RE and DP provided an overview of the project. The following points were highlighted:

- When it comes to investigations of Rape and Serious Sexual Offences (RASSO), WMP is concerned about the level of successful outcomes for victims.
- This is an explanatory model, not a predictive model.
- The model looks at elements of investigation and elements of crime and of actors involved in order to establish whether there are particular items of investigation that either reduce or increase the probability of charging. This is with an aim to inform on a broad scale the approaches that could be taken by WMP for these investigations to improve outcomes for victims.
- Personalised data is important for ensuring data sets are properly matched during the analysis. However, the themes identified to inform and improve policing practice would not require the communication of personal identities, i.e. names from the data would not be shared with anyone else in WMP, just the patterns identified used to inform policy. Inaccuracies with anonymised data pose a serious risk to accuracy due to data quality and historic manual inputs.

- What are the variables that will go into the analysis; i.e. what data sets will be entered? DP answered that the model looked at crimes, investigation notes, some custody data information and forensic evidence data.
- Is the model predictive? DP responded that it is not, and that it highlights patterns to help inform and improve policing practice.
- Has the issue of mobile phone data been considered and the associated controversies? DP answered that the model was unlikely to pick up nuances like the mobile phone issue, as it has no information other than if a phone was provided as part of an investigation. If the phone was used in evidence, then the model could pick it up.
- The committee noted that results of the model could potentially inadvertently negatively impact on investigatory practice, and care must be taken to ensuring as much is made public about the results as possible, i.e. great care needs to be taken to ensure that all findings are used to improve performance and do not, for instance, result in police identifying certain categories of cases that the findings suggested were harder to solve and thereby inadvertently encouraging the prioritisation of cases now thought of as being easier to solve. WMP responded that governance is important for ensuring the learning is used to improve investigations including governance safeguards to ensure the principles learned resulted in positive practices and progress, and that the model is always about improving the service.
- Would communication of the results be limited to certain management levels within WMP? It was concluded that one would have to expect it to



be communicated across a broad group because such investigations are handed at Sergeant and Inspector level. The committee felt it reasonable that the findings were used to inform senior strategy that would need to be filtered down to all applicable operational levels to improve practice from the learning.

- Is anonymisation feasible? DP answered that, in order to receive accurate results, it would not be particularly feasible to anonymise the data
- The committee advised WMP that its lawyers considered human rights arguments in favour of this initiative, as well as against, to ensure there was a balanced debate around how this kind of analysis can improve outcomes of sexual crime victims within a national context of many victims being let down.

5 - Explanation of the 'DAL_2018_0002_Priorities' paper

RE and DP provided an overview of the project. The following points were highlighted:

- The project is exploratory and not predictive.
- The aim is to reduce response times to emergency calls and/or to help ensure the appropriate response is more likely to be given to emergency calls based on the information provided.
- It takes information from systems such as: when a call has come in, how long it took to dispatch, how long it took for arrival, health records around officer injury etc.
- The aim is to minimise response time whilst also not increasing the risk to officers, whilst simultaneously providing the service WMP wants to provide.

- Can you justify the use of health records? DP answered that it was necessary to get the answers and specifically take health concerns on board given the health and safety component to this research.
- What is the prospect of getting consent for officers' health records in order to make them part of a research project? DP answered that the HR data used covers everyone in WMP in order to look at the risks and dangers to officers. DP explained that consent across the whole board would take a long time so might be a problem.
- What assurance is there that this isn't going to be used to balance or
 potentially reduce health and safety standards? DP gave assurance that
 the parameter is about how optimisation can be improved without
 reducing health and safety. Anything that goes above the normal
 proportion of injuries would be rejected.
- Anonymisation is often not effective for enabling the research but the use of health data is controversial. A number of officers may decline the request for their health data being used as it is extremely personal and there will be concern that it may be used in a detrimental way to them personally. Is the health data actually essential? RE answered that representatives of officers and staff have indicated that they wouldn't be against this exploration as it could benefit them professionally and in terms of safety. This is similar to the initial negative perception of body



cameras amongst officers, which then improved as it transpired that their use was actually beneficial to officers.

- How are response times assessed? It would be necessary to clarify that the aim is to speed up response times but also to learn how to give the best/appropriate response, so that it is not arbitrarily aiming for quick responses at the expense of quality service and safety. RE responded that often WMP does not meet response targets, so this model is designed to see ways to improve that using existing resources.
- Would you look at proxies for health? DP answered that they can look at proxies, but the data available is somewhat limited for this analysis.
- Does WMP's use of force flag up when an officer has been injured? DP and RE explained that it doesn't link back to WMP necessarily but maybe for crimes when the officer has been assaulted, which is only one element that might result in injury to an officer. RE also raised WMP's awareness of considering the impact of anxiety and stress connected to single crewing, i.e. one officer attending an incident alone.
- How much input do you have from existing research in the area of optimal response from operational research areas? DP answered that what is being done elsewhere is similar to this approach, and extensive reading has been undertaken about this. Existing research has informed the current methodology.

6 - Explanation of the 'DAL_2019_0003_Disproportionality' paper

DP and RE provided an overview of the project. The following points were highlighted:

- The aim of the project is to identify disproportionalities in WMP's practices to inform policy and address any, for example, discriminatory practices identified.
- There will be an analysis of crime systems, stop and search, use of force and custody ISIS data to assess if there are disproportionalities.

- There are 4 proposals: is there an order of how you're going to do them? DP explained that they have all been started.
- Is this just a descriptive model? DP confirmed that it is.
- What will happen following the analysis? DP answered that it should help inform policy for WMP on these issues and it accompanies research by University of Warwick into disproportionality in WMP's stop and search practices.
- In the Lammy report, youth criminal justice was of most concern. Why wasn't that emphasis reflected in the paper? The concept of disproportionality in the Lammy review is much wider than how it appears in this paper and this caused the committee concern that serious issues were not being considered. It was suggested that the research should expand more on racism and wider race related issues. DP explained that age was included, such that disproportionality impacting on youth and race was possible, but there is currently no access to the Criminal Justice System (CJS) data.
- Will ethnicity and age be considered at the same time and will it be correlated? DP answered that the range of questions around disproportionality was growing considerably across actors within WMP



but that it was likely age and ethnicity will be one of those looked at in the near future.

- Are you looking at some control variables? DP answered yes, such as socio-economic data and looking at ethnic makeup in deprived wards, but this is a first step and it is iterative. They will be looking at different crime types.
- It was emphasised again that the Lammy review looks at BAME women and young people: it is very important to look at these issues.

Action:

- The committee suggests that WMP show how results will be communicated for transparency reasons. RE agreed that it can be discussed with Chief Constable (CC), who is eager to ensure all of WMP's practices are fair.
- Going forward, the committee agreed it would be helpful to have some idea of how this research will be used in practice so they can decide whether it is a helpful exercise that has meaningful outcomes.

7 - Explanation of the 'DAL_2019_0004_Youth and MSV' paper

DP and RE provided an overview of the project. The following points were highlighted:

- Nationally there has been an increase in violent crime, particularly amongst youth.
- As an explanatory model, this project looks at youths under the age of twenty-five, and the factors that may lead to an increased probability that they commit violent offences.
- Gun and knife crime are separate analyses.
- The model is trying to identify in aggregate what the factors are that seem to lead to people committing more serious violent crimes.

- Can you outline the factors going into the model? DP answered that the factors included are: information from the crime system, ISIS custody data system, intelligence logs.
- This seems like a predictive model? DP explained that it could be used for a predictive fashion but that is not what it is for and not the intention. It looks at trends and is intended to inform policy. The Lab will not be using partner data at this point.
- Is there room to include data of adverse childhood experiences? DP answered that if the data was available in the future, that it could potentially be included. School exclusion data would be useful. However, these are long term projects. It was discussed by the committee that looking at the underlying factors that can make people vulnerable to crime (such as having been a victim of violence themselves, or other social problems that go under supported), would be the most valuable analysis and were concerned that this does not achieve that. It was also acknowledged that in the future, other agencies might be better placed to undertake this kind of analysis from a public trust perspective, and/or that the relevant information sharing will likely be a significant challenge.



- How restricted are you regarding access to different data sets? DP explained that further data sharing which would take a lot of time, meaning they are quite restricted by the data they have available.
- Would you not worry that what you identify is only part of the story? How
 can you say this is a good model without partner data and all the
 information? DP answered that it is essentially a binomial model but this
 could be put forward to partners to include this data. The Lab
 acknowledged the significant missing data.
- Is there guidance on how this is used? DP answered that it exists, but different bodies collect data for different reasons. Protocols would need to be put in place if data was going to be shared.
- When do you identify the need for sharing? DP explained that conversations are going on at a regional level about data sharing. There is good progress being made, but WMP are currently not in a position to share any data.
- Do you think that there are some insights that can be found from this about this issue without data sharing? DP explained that in a sense to identify whether there are trends that could meaningfully inform practice, the exploratory exercise needs to be undertaken.
- Concerns were raised around data sets that come together due to the purposes for which the data was collected, such as immigration data being collected alongside crime data.
- The committee suggests looking at the experience of other police forces would be helpful. WMP are looking at other areas of research outside the Lab, including school exclusions, childhood trauma and crime and other contextual areas so there could still be some merit in identifying some patterns of offending which could point towards how partners might provide more support.
- How easy has it been to work with the Information Commissioner's Office (ICO)? The Lab agreed that it would be helpful to have more constructive dialogue with the ICO in the future about this project and others.
- The committee agreed that it would expect to see a final legal opinion, with a detailed consideration of human rights, supporting this proposal before it proceeded.
- RE raised the notion that WMP has a moral duty to explore its data sets to do all it can to improve the way it prevents youth offending.

The meeting was paused for lunch at 12:30.

8 - Committee Advice & Recommendations to be provided to the Police & Crime Commissioner and Chief Constable:

IOM Model

The following general comments were made by the committee:

- The committee requests to see Data Protection Impact Assessments when proposals are submitted.
- The papers contained by necessity a high level of technical detail.

 Consideration needed to be given to increasing comprehensibility and readability for committee members and generally.
- The intended benefits of the proposals need to be clearly articulated.



Generally, while appreciating that WMP remains the data controller, legal advice needs to consider personalised data and how it could be anonymised before being given to the Lab so as not to undermine the matching of data and analysis capability. For instance, could a department of WMP match the data, then anonymise it, so as to remove the analysis further away from personal identification where applicable?

The following positive comments were noted in relation to the IOM model:

- The committee expressed their thanks to the team for their work and patience they exhibited answering questions of the committee.
- The committee acknowledged the significant development since the previous meeting and that progress is being made on the model.
- The positive input of JB was noted for her explanations of the interventions and offender management process.
- The clarification around the fact that the model is only relating to individuals who have been charged or convicted of an offence and that it doesn't include suspects or victims was noted.

While the committee was generally supportive of the intention behind by updated IOM model (to provide greater accuracy in identifying those who need support to improve their lives and avoid crime), the following questions need to be addressed:

- Can the model be proved against internal and external validation in order to demonstrate it has meaningful predictive value, internal consistency and that it generates good results? This is absolutely essential if the committee is to advise that the project progresses.
- Can the distinction between explanation and prediction be more clearly established? Currently it is not clear that one doesn't feed into the other, in terms of how the explanatory results end up being used.
- Can the limitations of the data be considered so that the models are not being driven by the data that is available? Unless the data is carefully chosen and considered for its own merits, the answers may not be informative.
- Although the committee acknowledged that the team had considered other relevant literature, it was suggested that more research could be undertaken on work around labour market outcomes and gender/ethnicity bias, for the purpose of their disproportionality research.
- Can the committee receive a more thorough explanation of the level of predictive accuracy testing that has been undertaken to date, to aid the committee's understanding?
- What is going to be the benefit of the IOM model in practice and how is it going to help Offender Management (OM) concretely?
- Can the rationale be based more on evidence that OM were missing very high risk offenders, otherwise it is not clear what it is serving?

The committee therefore makes the following recommendations for the Lab:

 It was noted that the model is intended to go forward for a rebuild (including reconsidering the use of stop and search where no positive outcomes were found), so consideration should be given in relation to testing to ensure that there is clear evidence provided of predictive validity.



- Consideration should be given to providing evidence to demonstrate the benefit of the model (including qualitative explanation) compared with other means of achieving the same objective, and that attention must be given to legal advice and ensuring that evidence is built up for the proportionality and necessity case.
- The need for a protocol was mentioned, which should be drafted covering how the link between the tool and intervention will be made and how JB will interact with the tool to ensure it is used appropriately.
- The committee wants the existing evidence to be further articulated and built on as part of the rebuild process and expects this to be an area of development.
- It was requested that the project return to the committee once the rebuild is complete, and the committee expressed they were looking forward to then next version of the model.
- The committee agreed that a non-technical summary of the key findings of the rebuilt model would be essential for aiding understanding.
- A final legal opinion, with detailed human rights considerations, will be required to justify the model.

Based on the questions and recommendations, the committee unanimously voted in favour of option 'E' under the Terms of Reference, meaning it is not yet able to advise the Police & Crime Commissioner and Chief Constable on approval or otherwise of the model in respect of the ethical standards expected and has therefore requested more information from the Lab in order to be able to provide further advice. In turn, the Police & Crime Commissioner and Chief Constable are therefore advised to request WMP's Police Analytics Lab come back with more information as suggested above.

Sexual offences analysis

The following positive comments were noted in relation to the RASSO paper:

- The committee noted the potential value of this tool in advising approaches to police investigations for sexual offences.
- The committee expressed some concern that the analysis being conducted may miss important issues due to data limitations, such as missing the relevance of the controversial mobile phone and rape investigation debate.

While the committee were generally supportive of the RASSO project, the following questions need to be addressed:

- Can we share thematic issues with the public as they arise, such as reference to general investigatory flaws, and can the committee have more information about how this would be done?
- Will data be anonymised?
- Is there a risk that the findings could inadvertently encourage the prioritisation of cases thought of as being easier to solve, and if so, how will this risk be mitigated against?
- What kind of outcomes is WMP hoping to achieve with this, and what might success look like?

The committee therefore makes the following recommendations for the Lab:



- The committee recommends anonymising the data held within the Lab as a priority and, noting that WMP remains the data controller in any event, to consider how the purpose of this project can be more directly expressed in terms of its key public purpose. The committee believes that there is a clear public protection purpose around this research and that there are important reasons behind it.
- Safeguards should be seriously considered around ensuring only positive outcomes come from findings that do not inadvertently impact on the success rate of certain investigations.
- The committee requests that the results of the analysis come back to the committee for discussion, particularly around the risk of moving to a predictive model and the potential biases within that, and it wants to see real assurances that the data outcomes will be used in the right way.

Based on the questions and recommendations, the committee unanimously voted in favour of option 'C' under the Terms of Reference, meaning it advises the Police & Crime Commissioner and Chief Constable to go forward with the project with major amendments, on condition that results come back to the committee to discuss, and that it will then consider concerns around potential biases and how the findings are used.

Priorities paper

The following positive comments were noted in relation to the Priorities paper:

- The committee notes the positive reason for this research around improving response with a clear focus on minimising the health and safety risks to police officers.

The committee have expressed that the following questions need to be addressed regarding the Priorities project:

- Will there be consideration of the fact that the right personnel are assembled (i.e. the right combination of officers with the right expertise etc.) to attend for a specific target situation, which might take longer?
- What engagement will there be with the Police Federation?
- Would it be preferable to ask for consent from officers for their health data than proxies?
- Might not the general medical picture cause complications over cause and effect, i.e. was it the incident that caused the health issue, some other cause or health impacting on incident outcomes?
- Could there be data that was useful but that you couldn't make any identification from, such as some sort of proxy to prevent the violation of anonymity?
- What exactly is needed from the health records? It may not be related to the purpose of this analysis.
- The legal issue of accessing health records without consent must be addressed before the project can go forward. What would results of the analysis look like without including the health records?

The committee therefore makes the following recommendations for the Lab:

The committee requests that the team gives further consideration to the proposed use of health data across the board, especially considering



what specific factors are required for research, with possibilities of proxies and/or a process of obtaining consent from officers for that relevant bit of information.

- The committee suggests a consideration for how the purpose of the project is articulated.

Based on the questions and recommendations, the committee unanimously voted in favour of option 'E' under the Terms of Reference, meaning it is not yet able to advise the Police & Crime Commissioner and Chief Constable on approval or otherwise of the project in respect of the ethical standards expected and has therefore requested more information from the Lab in order to be able to provide further advice. In turn, the Police & Crime Commissioner and Chief Constable are therefore advised to request WMP's Police Analytics Lab come back with more information as suggested above.

Disproportionality paper

The following positive comments were noted in relation to the Disproportionality project:

- The committee expressed a positive message in terms of this research and its importance.
- It is positive that the team is looking to address it and their reference to the Lammy review is a good start.

While the committee were generally supportive of the Disproportionality project, the following questions need to be addressed:

- How is the project going to work in practice?
- How useful will raw disproportionality numbers be?
- How are results going to be communicated?

The committee therefore makes the following recommendations for the Lab:

- Consideration should be given to factoring in control variables to improve the analysis.
- Consideration should be given to reviewing the data with other relevant agencies and subject matter experts, bearing in mind limitations of WMP data.
- The description of the project's purpose should be elaborated.
- The committee wants to see the results, and particular detail around the influence of certain factors like positive and/or negative stop and search data.
- The committee encourages the team to give further consideration to the Lammy review issues (youth justice and the intersections between age, gender, race etc.). This should be done as thoroughly as possible because it is going to inform policy.

Based on the questions and recommendations, the committee unanimously voted in favour of option 'C' under the Terms of Reference, meaning it advises the Police & Crime Commissioner and Chief Constable to go forward with the project with major amendments, on condition that results come back to the committee to discuss.



Youth violence paper

The following positive comments were noted in relation to the Youth and Most Serious Violence (MSV) project:

- The committee can see strong benefits for the research if it is done with a consideration of the other factors that are relevant to the causes of this type of violence.

The committee have expressed that the following questions need to be addressed in relation to the Youth and MSV project:

- Why is it necessary to use personal data? If this is about learning trends, it is unclear why personal names should be used. Personal data could risk the findings being used to inform a police activity, which may or may not be appropriate, i.e. if it resulted in a form of predictive analysis.
- Are there some insights that can be found from this about this issue without accessing other relevant data from other agencies?
- Is there room to include data of adverse childhood experiences, and should this be the appropriate long term ambition, in collaboration with partners?

The committee therefore makes the following recommendations for the Lab:

- The committee requests more information on the reason for this research and the output.
- Consideration should be given to whether this analysis is going to produce some meaningful outputs, with other relevant contextual factors absent – further explanation as to the intended benefits is therefore required. Otherwise, without partnership data of some kind, this analysis would not be worth pursuing.
- Potentially change the purpose of the data analysis to something more realistic with the data available.
- WMP should conduct further conversations with its lawyers about why this analysis is necessary, particularly if it is combined with working with other agencies.

Based on the questions and recommendations, the committee unanimously voted in favour of option 'E' under the Terms of Reference, meaning it is not yet able to advise the Police & Crime Commissioner and Chief Constable on approval or otherwise of the project in respect of the ethical standards expected and has therefore requested more information from the Lab in order to be able to provide further advice. In turn, the Police & Crime Commissioner and Chief Constable are therefore advised to request WMP's Police Analytics Lab come back with more information as suggested above.

- **9 -** The meeting was paused for a break.
- 10 Data Protection/GDPR training session outlining generally how WMP store and protect data in compliance with Data Protection laws.
- **11 -** The meeting closed at 15:00.