



Ethics Committee

Wednesday 6th July 10:00 – 13:00

Meeting held virtually via Zoom

Present:

Marion Oswald	Chair of Ethics Committee
Thomas McNeil	Assistant Police & Crime Commissioner
Jack Tracey	Criminal Justice Policy Lead (OPCC)
Derek Dempsey	Ethics Committee
Malcolm Fowler	Ethics Committee
Simon Rogerson	Ethics Committee
Claire Paterson-Young	Ethics Committee
Sian Thomas	Ethics Committee
Pete Fussey	Ethics Committee
Tom Sorrell	Ethics Committee
Kerry Reid	Ethics Committee
Matthew Tite	Superintendent NDAS SRO (WMP)
Davin Parrott	Data Analytics Lab (WMP)
James Spooner	Data Scientist (WMP)
Steve Clark	Data Scientist (WMP)
Florence Galliers	Data Scientist (WMP)
Insp. Mark Cooper	Performance Manager (WMP)
Insp. Kym Jones	Project Guardian (WMP)
Alec Wallace	Neighbourhood Policing Manager (WMP)
Sam Todd	Data Lab (WMP)
Anthony Duff	Secretariat (OPCC)

Apologies:

Jennifer House-Go	Ethics Committee
Jamie Grace	Vice Chair of Ethics Committee

1	10:00	<u>Welcome and updates</u> Chair opens the meeting and welcomes new members – notes their range of expertise and experience which will be valuable to the committee.	Marion Oswald
2	10:05	<u>NDAS update</u> Funding was confirmed from HO until the end of July – there is a meeting with Bethan Jones (HO) on July 15 th to discuss funding thereafter. It is preferable that funding can be continued until NDAS cases can be transferred onto the new national platform.	Matthew Tite



		<ul style="list-style-type: none"> - A meeting chaired by ACC Chris Todd to discuss the new data analytics structure (including TORs, establishing a data board, and specifics around the redesign). There will be a follow-up meeting in Birmingham in the near future to pick this work up. <p>All of the code NDAS has been transferred to WMP should it be needed in the future.</p> <ul style="list-style-type: none"> - At present, NDAS has 2 operational use cases in WMP: modern slavery and violent crime – a number of end users which are being engaged with regarding the benefits of NDAS to their organisations/ programmes. <p>Committee questions/ comments:</p> <ul style="list-style-type: none"> - Member noted their frustration at the lack of exit strategy around funding and asked whether the feedback from end users could be shared with the committee. <ul style="list-style-type: none"> o Presenter agreed to share end user feedback when it becomes available after the beginning of August - Member asked if end users will be able to continue to use NDAS if/ when it comes to an end? <ul style="list-style-type: none"> o Presenter said that if NDAS funding stops and the function isn't replicated elsewhere then end users will not be access NDAS insights – HO see the benefit of NDAS and see the benefits in potential alternatives should funding not be available (e.g. around using the PNC as a data source to build use cases). - Chair requested that at the next meeting there was an update on the feedback received from end users as well as an update on HO conversations which was agreed to by the presenter. 	
3	10:20	<p><u>Drone Unit cost-benefit analysis</u></p> <p>Previous recommendations from the Committee:</p> <ul style="list-style-type: none"> - Further information required and clarity required on societal/ ethical risks (not entirely possible given the time taken to confirm minutes and recommendations from previous meeting). <p>Analysis confirmed that estimated cost/ benefit ratio is 7.34</p> <p>Committee questions/ comments:</p> <ul style="list-style-type: none"> - Member asked whether drones which were taken out but not deployed when on operations were considered in the analysis. <ul style="list-style-type: none"> o Presenter confirmed that this was considered and is reflected in the positive outcome rate - Member asked whether the analytical formula used is standard and whether it has been applied to other projects. <ul style="list-style-type: none"> o Presenter confirmed that the formula was developed specifically for the drone unit project 	Davin Parrott



	<ul style="list-style-type: none">- Member asked whether it was possible to show comparison against other policing approaches (rather than drones) to confirm positive outcome impact.<ul style="list-style-type: none">o Presenter stated that this would be difficult given that it is hard to identify impact on positive outcomes for other policing approaches given that it is not a specific outcome available through the data (it is recorded with drones). The member noted that the lack of this information might be worth raising in order to get a better idea of positive outcome impact.- Member pointed out that addressing the issue of ‘qualitative benefits’ is difficult but that there is an opportunity to point out the value drones have in protecting frontline police and acting as a deterrent – analysis needs to recognise the non-monetary value of these innovations.- Member recommended that all calculations in cost benefit analysis paper should be re-checked (with some sums not adding-up).- Member noted that more attention ought to be paid to the ethical issues raised by drone activity (and how/ why WMP plan to address them or not) rather than the financial issues – central to the culture of these assessments and the purpose of the committee. Noted that there are huge advantages to use of drones but the discussion/ analysis needs to be focussed on ethics so that this can be communicated to the public.<ul style="list-style-type: none">o Presenter stated that it may well be other ethics processes within WMP are more appropriate avenue for this kind of analysis to be done. Member noted that expert advisers had supported Lab in the past when issues came before the Committee and that there should be an effort to bring those analyses in for future presentations.- Member asked whether it was only positive outcomes which were considered in the impact assessment or if some consideration was given to issues around public engagement and consent<ul style="list-style-type: none">o Presented noted that there was no wider information regarding public trust. Member responded by saying it was essential to consider issues of trust when considering impact and that communications around their use needed to be expanded to include substantive engagement (the impact of any tool will be greater if the public trust it).- Member re-stated the importance of legitimacy and public confidence to the assessment of the impact of police tools. Also noted that benefits and harm can’t always be quantified and questions whether a cost benefit analysis is useful in all scenarios. Offered to discuss further possibilities around insourcing analytical expertise around ethical/ qualitative issues- A member noted surprise that the report didn’t deal with wider social context. This is supported by a member who noted that the Lab were selective in their audit/ categorisation of benefits and cost.- Chair asked what stage the paper was at and what the next steps were	
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		<ul style="list-style-type: none"> ○ Presenter noted that corrections need to be made to go into the senior leadership team and then onto Force Executive for decisions to be made regarding future funding 	
4	10:45	<p><u>Operation Guardian – RCT of violence patrols (in principle)</u></p> <p>Operation Guardian is funded via HO in order to reduce violence (in particular serious youth violence) in West Midlands area. There is a desire to look at a ‘hot spot’ approach for violence patrols and the effectiveness of this. The project is to design a model to assess the impact of this approach.</p> <p>Committee questions and comments:</p> <ul style="list-style-type: none"> - Member questioned how it was possible to identify ‘sudden’ hotspots which become apparent (i.e. areas where there isn’t a historic issue but where violence incidents have occurred recently) <ul style="list-style-type: none"> ○ Analysis has compared data from various locations using different ‘band widths’ (i.e. different geographic diameters as well as different time periods) overlaid with feedback from neighbourhood police teams before a final selection of geographies for patrols would be made. Unlikely that ‘sudden’ hotspots would be covered by this analysis, but ordinary tasking processes should be able to pick up on these occurrences. - Member questions what the primary focus of the analysis was – was it hotspot identification or policing responses to those hotspots. <ul style="list-style-type: none"> ○ Presenter confirmed that it was policing responses to identified hotspots – the aim is to look at the impact of patrolling in these areas. - Member asked if there were any situations where an area might not get any patrols as a consequence of being involved in this RCT <ul style="list-style-type: none"> ○ Presenter confirmed that business as usual policing will continue (the RCT trial is focussing on additionality that WMP are trying to bring to specific areas to reduce violence) - Member expressed surprise that this analysis would not be a predictive model – questioned what the point of identifying hotspots was if not to be in some way predictive about the likelihood of violence and the appropriate police response - Member expressed concern about the use of data sets in identifying hotspots which were already impacted by disproportionality (i.e. Stop & Search record) and the sophistication applied to unpacking these data sets (i.e. whether St & Search records would be used only when a weapon was found) <ul style="list-style-type: none"> ○ Presenter confirmed that any Stop & Search data would not be used to determine hotspots (only crimes/ incidents of serious violence). - Another member questions whether the project actually constituted an RCT – not entirely clear what question the project is seeking to answer. 	Insp. Kym Jones



5	11:05	<p><u>Stalking Offenders (in principle)</u></p> <p>Aim of project is to build a model of known stalking offenders in order to predict the likelihood that they'll go onto commit higher harm offences. Approach is broad ranging and would require data inputs from a range of sources looking at both offender and victim pathways. Precise model is not yet clear.</p> <p>Committee questions and comments:</p> <ul style="list-style-type: none">- Member expressed confusion at the status of the project – without a clear model/ methodological approach there is no way to reach any kind of judgement regarding the status or shape of the project. This was reiterated by another member who noted the need for much greater detail.<ul style="list-style-type: none">o Presenter agreed with this but noted this was only an in-principle presentation for the Committee to consider whether there was anything they objected to 'in principle'- Member noted that the proposition to try to built a predictive model around this type of threat was reasonable, but reflected i) use of partnership data will be particularly important to build holistic predictive picture which gives rise to ethical concerns around how data is shared/ used, ii) just because some individuals are not obviously high risk is doesn't mean they aren't risky and we need to make sure that isn't overlooked, and iii) we need to make sure we don't allow outputs of this model to be shared in such a way which entrenches stigma.<ul style="list-style-type: none">o Presenter noted the complexity of data sharing around issues such as stalking (or similar offences) give range of potential partners and suspects. At present there is a need to identify who presents the greatest risk in order to satisfy the demands of investigations teams as well as comply with Force governance.- Member questioned what the outcome of this predictive tool was beyond safeguarding – needs to focus on interventions and types of support in place for victims.<ul style="list-style-type: none">o Presenter noted the validity of the comment/ questions and the importance of merging support for the victim with taking proper action against the suspect – part of this project is to find out how best to do that.- Member noted the importance of considering mitigating/ protective factors and building in multiagency data to do this. Also noted concern about individuals (victims and suspects) being de-prioritised based on the predictive model and the possibilities around profiling when using data around race/ ethnicity in particular.<ul style="list-style-type: none">o Presenter noted that even where information around race/ ethnicity (and other protective factors) isn't included this doesn't guarantee the removal of bias – including this information, where appropriate, is to ensure that the model doesn't make assumptions around these factors.- Member asked whether WMP intended to look at models built by other Forces (as in Hampshire)	Insp. Mark Cooper
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		<ul style="list-style-type: none">○ Presenter confirmed this was the intention	
6	11:30	<p><u>Solihull Partnership Data insights Project (proof of concept)</u></p> <p>Aim of project is to enable data sharing between partners in Solihull (potentially focussing on the Kinghurst area). Proposal is prospective reflecting desire of organisation in Solihull to do this. Want to understand any concerns the Committee has in principle around this project.</p> <p>Committee questions and comments:</p> <ul style="list-style-type: none">- Member questions what the purpose of data collection is and noted that there may be huge incompatibilities between the different data sets which make them impossible to use together<ul style="list-style-type: none">○ Presenter agreed with points and noted that such questions have already been posed to potential partners- Member noted that the principle was fine but more needed to be understood about the purpose to comment on possible ethical issues<ul style="list-style-type: none">○ Presenter noted that the purpose of the project is to identify the rights kinds of interventions for individuals coming into contact with multiple agencies. The Member responded by saying that proper consideration thus needs to be given to the level of data used – aggregated data would likely be of little relevance when looking at the service needs of different individual cases. There isn't the justification to gather/ share data simply because it *might* be useful.- Member noted that the objectives of the project were too vague and that purpose needs to be more focussed<ul style="list-style-type: none">○ Presenter agreed and noted that the purpose of bringing the paper was to establish any in principle concerns. Member thanked WMP for bringing in principle papers, notwithstanding the concerns around objectives, as it is acknowledged that the intention is to bring the project back to the committee with more substance.	Davin Parrott
7	11:45	<p><u>Committee to discuss advice on above submissions/papers</u></p> <p>Given the scope of the discussion, Chair noted that it would be necessary to discuss how the agenda is built/ decided with the Lab (perhaps avoiding some of the unnecessary elements of the in-principle discussion). A member noted in response that it remained important to hear from in principle ideas in order to get a holistic view of their activity.</p> <ul style="list-style-type: none">- A member noted that much more detail was needed from submission in order for Committee members to be able to scrutinise and offer advice. <p>NDAS:</p> <ul style="list-style-type: none">- Committee should advise that exit strategies regarding funding need to be considered from the start.	Committee



		<ul style="list-style-type: none">- User feedback should be brought to the next Committee. <p>Drones Unit (option C – Committee advises approving the project with major amendments):</p> <ul style="list-style-type: none">- The members noted concern that previous comments by the Committee were not considered in the cost-benefit analysis. More qualitative comments and ethical considerations should form part of the report in order to account for the Committee’s previous recommendation.- Consideration needs to be given to whether a cost-benefit analysis is the most appropriate methodology given how important social impacts are to such policing tools- The Committee requested that all returning projects need to show or comment on how previous advice was used in taking projects forward. <p>Stalking offenders (option E – Committee requests more information from the Lab in order to be able to advise):</p> <ul style="list-style-type: none">- Difficult to comment due to lack of proposed methodology – much more information required around the consequences of using this tool for both suspects and victims.- The Committee noted that it is a good objective in principle to look more closely at data to see if there are trends which enable WMP to identify high risk cases better.- The Committee commended the force for the consideration WMP were giving to victim support and interventions on the back of this project. <p>RCT violence controls (option E – Committee requests more information from the Lab in order to be able to advise):</p> <ul style="list-style-type: none">- The Committee would be prepared to offer a sub-committee of expert members to look at details of project in greater detail.- It was noted by the Committee that it was not clear how Stop & Search data would be used and whether this was part of the assessment – one of the outcomes of increased patrols would likely be increased Stop & Search activity and its important to understand the consequences of this long-term. <p>Solihull partnership data (option E – Committee requests more information from the Lab in order to be able to advise):</p> <ul style="list-style-type: none">- The Committee agreed that, in principle, more information sharing between public bodies could be a positive step – however, clarification was required around whether the proposed sharing involved individual or aggregated data. The Committee advised that much more specific questions are laid out regarding what the purpose of the data sharing is.	
8	12:15	Comfort break	



9	12:20	<p><u>Force Response Service Ratios/ Force Response Bank Holiday Resourcing/ Crime Seasonality Planner</u></p> <p>Force Response service ratios and Bank Holiday resourcing questions are closely linked – trying to ascertain appropriate adjustment to those ratios in order to provide Force Response a better idea of resources needed (rather than a set figure).</p> <p>Previous seasonality planner (discontinued 2020) to be brought back – to help identify months where certain crimes are likely to go up or down (compared to normal) in order to make more nuanced judgements for resourcing decisions.</p> <p>The resourcing tools are yet to be used and currently receiving feedback.</p>	Davin Parrott
10	12:25	<p><u>Collecting data on Protected Characteristics and Demographic Data</u></p> <p>Committee advice and comments temporarily redacted, awaiting further advice, on the basis that this project was not the responsibility of the Lab.</p>	Davin Parrott
11	12:40	<p><u>Police Race Action Plan: discuss and debate the implications of racial disparities on policing data analytics, and to offer comments and advice from the committee’s experience on how best to avoid bias in digital policing and how best to pursue a ‘national approach’</u></p> <p>The NPCC issued a police race action in May 2022 and Sir David Thompson (Chief Constable WMP) is the senior responsible officer for that alongside the College of Policing</p> <ul style="list-style-type: none"> - There is an action relating to data in the plan which says that policing will develop an ethical approach eliminating discriminatory practice – to achieve this ambition, policing will develop a national approach for data ethics to ensure digital policing is not biased. <p>Committee comments and advice:</p> <ul style="list-style-type: none"> - A member noted that it is crucial to have the available data on protective characteristics (required to establish a non-biased approach) but that this data should not be used for predictive purposes - A member pointed out the integrity of the data as the foundation of everything – the issue of data provenance needs to be addressed which would then allow for confidence in models which are subsequently developed as being grounded in integrity <ul style="list-style-type: none"> o Lab colleagues noted that all data they handled came from officers ‘on the ground’ and so data provenance was well established – this doesn’t mean, however, that data is perfect. - Member asked how issues around provenance are considered when asked to handle intelligence data sets – this relates to issues around the ‘adultification’ of children (i.e. involved in strip searches) and how they might feed into data which is held in intelligence data sets <ul style="list-style-type: none"> o Lab colleagues noted that with intelligence specific things are looked for via a supervised method (e.g. relating to previous 	All



		<p>offences) – there is usually a quality score attached, with low scored intelligence disregarded (i.e. if something comes from an unknown source)</p> <p>Further comments to be submitted via the chair.</p>	
12	12:55	<p><u>Committee discussion on submission</u></p> <p>Force Response Service Ratios/ Force Response Bank Holiday Resourcing/ Crime Seasonality Planner (outcome A)</p> <p>Collecting data on Protected Characteristics and Demographic Data:</p> <ul style="list-style-type: none"> - The Committee noted the sensitivity of the data elements proposed in this project and it is not clear what the purpose/ benefit of requesting this data is – too many data points, list ought to be focussed - The Committee emphasised concern around ‘just in case’ data collection – this isn’t an ethical starting point for data science and modelling - Needs to clarify what the purpose of the submission was and unclear what advice should follow <p>Member noted the need to expand the DPIA template to cover difference uses of data (particularly special category data). Member to consider changes and pass thoughts on via email to chair.</p> <p>The Committee requested that for future submissions from the Lab it will be expected that these will include a report on how the Committee’s recommendations were acted on.</p> <p>It was also agreed that the submission process should be revisited in order to streamline and refine the template and to ensure that ethical considerations of proposed projects are considered within the submission. A working group would be formed to consider these refinements (action JT).</p> <p>Date of next meeting TBC (early October).</p>	Committee
13	13:00	AOB and Meeting Close	CLOSE