**ETHICS PANEL – Formal Group Meeting**

**Wednesday 5th March 2025**

**10:00-13:00**

Meeting held virtually via Microsoft Teams

**Present**:

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| Marion Oswald |  | Chair of Ethics Panel |
| Jonathan Jardine |  | Chief Executive (OPCC) |
| Derek Dempsey |  | Ethics Panel |
| Tom Sorrell |  | Ethics Panel |
| Jennifer Housego  Malcolm Fowler  Simon Down |  | Ethics Panel  Ethics Panel  Head of Policy (OPCC) |
| Edward Hunter |  | Policy Intern (OPCC) |
| Davin Parrott |  | Data Analytics Lab (WMP) |
| Tom Joyce  Matt Welsted  Tony Hopkins  Ryan Chambers  Kym Jones |  | Chief Superintendent – Head of Corporate Development (WMP)  Assistant Chief Constable (WMP)  Chief Superintendent – Head of Public Protection (WMP)  Superintendent – Command Team (WMP)  Inspector – Central Intelligence Team (WMP) |
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**Apologies:**

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| Peter Fussey  Kerry Reidy  Anindya Banerjee  Claire Paterson-Young  Simon Rogerson |  | Ethics Panel  Ethics Panel  Ethics Panel  Ethics Panel  Ethics Panel |

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| **1** | **10:00** | **Welcome**  The Chair opens the meeting, welcomes members and notes apologies of those absent. | **Marion Oswald** |
| **2** | **10:05** | **Update on actions**  The Panel is updated that a meeting to discuss the new terms of reference, including their comments and suggestions is to take place this week.  The OPCC also updates the Panel that the AI Smart Safety Cameras that were the subject of the latest interim meeting will not be returning to the Panel as the pilot has failed in its application for funding and will not be going ahead.  The OPCC further informs the Panel, for the benefit of those not in attendance of the last interim meeting, that Jack Tracey has left his position at the OPCC and his role in regards to the Ethics Panel is to be taken up by Simon Down, Head of Policy within the OPCC. | **Simon Down** |
| **3** | **10:10** | **Indecent Images**  The presenter explains that in cases in which indecent images of minors are discovered, national guidance suggests that such images should be uploaded to a national database without exception. It is, however, currently left up to individual officer’s discretion as to whether they comply with this.  The presenter suggests they are seeking guidance from the Panel as to whether all images should be uploaded to this database, particularly in non-aggravated cases in which the pictures have been shared consensually but, nevertheless depict minors. With a child protection inspection coming, WMP is eager to present a policy position on this topic.  The presenter explains that the pictures are stored on this database in order to flag up whether or not they ever re-appear in subsequent cases and can check where it has been shared. This also provides a level of automation that reduces the impact on staff as they would have to view the images to a lesser extent.  It does however, often necessitate the confiscation and wiping of the child’s device, often removing a significant extent of their social life or support network. As such, the presenter expresses worries about the proportionality of the response and criminalising children in non-aggravated cases. The presenter also poses the question that, would a parent want these images to be contained on a national database indefinitely?  The presenter concludes by suggesting they are awaiting legal advice which is expected in May and clarifying that there is no current legislation on this topic, with only guidelines currently existing.  **Questions and Responses**  A panel member disagrees with the parent perspective, suggesting the benefits of the database outweigh any reservations. The member continues by suggesting the response should emphasise the seriousness of the issue to the children but not criminalise them.   * Another member raises the roles schools could play, suggesting specialist officers could raise awareness of the issue in schools. * The presenter explains WMP has school officers but suggests there is no data on the effectiveness of their work.   A member argues that the database’s potential for tracking is a very valuable resource which could also, in and of itself, act as a deterrent.  Another member asks if the images are categorised on the database and inquires as to the level of access officers have to it.   * The presenter explains it is a searchable repository and that full picture data is available including locations. * The presenter continues by informing the Panel that only specialist, trained officers have access to the database, it cannot be widely accessed.   A final member emphasises the point that the issue should not be criminalised and, as part of this, devices should not be taken.   * The presenter agrees that the response should be proportionate. | **Tony Hopkins**  **Ryan Chambers** |
| **4** | **10:40** | **Match and Merge**  The presenter explains that within WMP’s Connect system, there are instances where the same person may have multiple profiles that need to be identified and merged. Match and merge is an automated process by which this is done based upon first name, surname, and date of birth within a certain criteria of tolerance.  The presenter continues that issues arise surrounding this level of tolerance as, when too strict, profiles are “under-matched” meaning certain individuals are not sufficiently linked to certain incidents and data, whilst when too lenient, profiles are “over-matched” and individuals are linked to incidents and data they have nothing to do with.  The implications of either situation can be serious, the presenter positing situations such as offenders gaining employment in vulnerable sectors, having not been linked to their crimes or the converse, of people being denied due to inaccurate records of criminality. The presenter concludes that, with police actions and decisions often relying on data in these profiles, guidance on the necessary level of tolerance from the Panel is incredibly important.  **Questions and Responses**  A panel member asks whether the system considers name changes?   * The presenter suggests this is one of the issues that can lead to multiple profiles being created for one individual.   Another member argues that whichever method has the highest rate of accuracy should be prioritised but continues by adding that the introduction of additional information into the criteria may assist the match and merge process, giving the example of place of birth or fingerprints.   * The presenter concedes this would help but suggests that people do lie or don’t know about their details. They explain that fingerprint data goes into the PNC not into connect and thus, cannot help this situation. As such they suggest they need an opinion on over or under-merging more explicitly.   A panel member continues by suggesting that other actions may assist in reducing false matches, proposing that merged profiles being flagged as the result of a merge to frontline officers.   * The presenter explains that this is flagged, as too are potential duplicates but that officers may not have time to access all records to reach the correct conclusion. * The presenter continues by explaining that officers can request for merged profiles to be re-divided but doing this manually is ineffective. | **Tom Joyce** |
| **5** | **11:10** | **Optimal Patrols**  Returning “In Principle” paper from 2023.  The presenter explains that the system puts data through a simulation that produces a ‘score’ and a subsequent optimal route and time for patrol in order to reduce the most harm. The hotspots are to be identified in sectors larger than wards but smaller than LAs, which enables the exclusion of City Centres as they rely on different data.  The aim of the project is to optimise the use of staff, especially when under-resourced, identify areas of harm, develop local knowledge, ensure resources are best used and to remove the unconscious bias/wants of officers when deciding where to patrol. Additionally, it ensures officers can be given accurate and up-to-date briefings on the specific area of their patrol.  **Questions and Responses**  A member inquires as to why death and serious injury related to dangerous driving is omitted from the data contributing to hotspot locations.   * The presenter explains that as traffic offences can take place over multiple areas, hotspots are less applicable to tackling them.   Another member asks whether there is the potential to override the model with certain information or should the need arise.   * The presenter suggests that the model is most applicable to, and best used for, ring-fenced resources rather than those liable to abstraction.   A member raises concerns about the method of evaluation for the hotspots, specifically questioning whether they result in displacement, their effect on public confidence or the extent to which they are self-fulfilling.   * The presenter explains that displacement is very rare in relation to hotspots temporally or spatially and assures the panel that they can change location if necessary. * The presenter continues by addressing the proposition of hotspots being self-fulfilling, noting that there is a strong correlation between calls from the public and hotspot locations so the heightened probability of crime is predominantly not the result of reports from an increased number of officers. * The presenter concludes that community feedback can form part of an evaluation process.   A further member asks whether it would be advantageous to be proactive with communities and inform them of the hotspots, suggesting this may help alleviate over-policing concerns.   * The presenter suggests they support more engagement with communities and the potential for greater visibility.   A member continues by inquiring whether the inclusion of drug offences in the algorithm is likely to lead to over policing, suggesting low level crime shouldn’t drive patrols.   * The presenter informs the member that the hotspots are skewed towards violent crime.   The member continues by suggesting crimes such as DA shouldn’t influence the hotspots as it takes place within homes and patrols are therefore, ineffective in tackling it.   * The presenter assures the member that the hotspots are designed around data for crimes most applicable to patrols, with DA excluded, for example. | **Davin Parrott**  **Kym Jones** |
| **6** | **11:40** | **Break** |  |
| **7** | **11:50** | **Panel Recommendations**  **Indecent Images:**  The Panel suggest that there is a need to separate the issues of uploading images to the database and criminalising young people. For instance, they suggest the wiping of phones is unnecessary and doesn’t comply with the sensitive treatment young people should be afforded. Along these lines, one member suggests that avoiding a binary response is essential in delivering this sensitivity, suggesting a tailored response is a must.  One member suggests that the sensitive approach should involve the parents and help impose the seriousness of the issue upon the child. Another member raises concerns about how this would be handled with older teenagers and whether their permission would be necessary to involve parents.  Multiple members suggest, however, that there is a distinct need to mandate and continue uploading images to the database. It is suggested that the adverse effects of not uploading the images outweigh the complications of utilising the database and that there are ethical, legal and operational concerns of not uploading.  One member explains it would be useful to know how often images on the database resurface in other cases before suggesting that issues of AI and AI generated images may escalate the problem and make the database more essential than at present.  A final concern raised by a member suggested there could be an issue that uploading the image onto a database could prolong trauma due to the image existing there indefinitely into later life. An alternative practice raised was that the images be deleted after a certain length of time having not been flagged in another case.  **Recommendations:**   * The Panel recommend that uploading every image to the database should be mandated and not left to individual officer’s discretion. * The Panel further raise that the experience of the child involved should be a sensitive, tailored approach that does not seek to criminalise them. * A final recommendation suggests that a piece of work should be commissioned to consider and investigate the entire process which can then be used to inform and dictate practice and the discussion. It is added that this should be a national discussion due to the prevalence of the issue and lack of national policy.   **No formal recommendation made**  **Match and Merge:**  The Panel agree that whichever approach produces the most accuracy should be prioritised as accuracy is the most important aspect, with members arguing that both ‘overmatching’ and ‘undermatching’ had the more serious consequences. They agree, however, that the implications of both could be serious and as such, time pressures cannot allow standards and the review process to slip.  The Panel suggest the risk will always exist no matter what action is taken and that there is no perfect solution to the issue. One member, for example, raises the issue that offenders will commonly lie about their details and no difference in approach will solve this.  Overall however, the Panel approves of the approach of WMP as it stands up to scrutiny and is defensible, limiting the extent of ethical concerns with the project.  One member suggested best practice would be to hope to introduce further variables into the process to make profiles more distinct from one another. The inclusions of IDs would be very beneficial although perhaps, difficult. The process in development uses the Levenshtein algorithm for matching names whilst only accommodating exact matches for date of birth.  **Recommendations:**   * The Panel suggests that an option to be able to link certain records but not formally merge them should be made available and that officers are to be made aware of which records are the result of a merge or have potential matches. * The Panel agrees that the current approach stands up to scrutiny and is defensible.   **Outcome B – Proceed with minor amendments**  **Optimal Patrols:**  One member suggested there was concern that hotspots may be misinterpreted as a predictive policing tool and suggested there was consequently, a need to clarify what they are.  Multiple members expressed a desire to see the community angle increased dramatically with members and leaders becoming more involved in the process. They suggested this could be hugely beneficial to both police and the community.  Overall the Panel suggested it was the right thing to do, ethically, to identify and target crime hotspots so long as the data is sound and supports their actions. In order to best do this, however, members suggested there should be greater communication and the introduction of a thorough evaluation process.  **Recommendations:**   * The Panel expressed a desire for a greater community aspect and communication surrounding the identification and deployment of resources to hotspots. * The Panel request that there should be a more formalised evaluation process introduced to ensure the efficiency and ethical validity of hotspot policing.   **Outcome B – Proceed with minor amendments** | **Marion Oswald** |
| **8** | **12:40** | **Any Other Business**  The Chair informs the Panel of the publication of an Amnesty International report into predictive policing in which WMP and the Panel itself are mentioned throughout. As the Panel is criticised in the report, the question as to whether they should publish a response is raised.  WMP suggests this is a decision for the OPCC and Panel itself to make, but that they advise against it. WMP reveals that they were invited to comment on the findings but chose to decline, aiming to not provide the report with credibility.  Issues with the robustness of the methodology and criticisms of the extent to which the report is thoughtful or sophisticated are raised. One panel member suggests the debate around predictive policing should be public, indicating a desire to respond.  Separately, the OPCC informs the Panel that the PCC’s new Police and Crime Plan is to be launched on the 26th of March and extends an invite to the launch event to all members. | **Marion Oswald** |
| **9** | **12:45** | **Meeting Close**  Next Meeting: June 2025 | **Marion Oswald** |