

**ETHICS PANEL – Formal Group Meeting**

**Wednesday 17<sup>th</sup> September 2025**

**10:00-13:00**

Meeting held virtually via Microsoft Teams

**Present:**

Marion Oswald	Chair of Ethics Panel
Derek Dempsey	Ethics Panel
Anindya Banerjee	Ethics Panel
Claire Paterson-Young	Ethics Panel
Malcolm Fowler	Ethics Panel
Tom Sorrell	Ethics Panel
Jonathan Jardine	Chief Executive (OPCC)
Simon Down	Head of Policy (OPCC)
Edward Hunter	Policy Intern (OPCC)
Davin Parrott	Principal Data Scientist (WMP)
Octavian Bordeanu	Senior Data Scientist (WMP)
Chloe Baker	Value and Business Architect (WMP)
Matt Welsted	Assistant Chief Constable (WMP)
Richard North	Chief Superintendent – Head of Corporate Development (WMP)
Tanya Johnson	Head of Police Led Prosecution & TIU (WMP)
Anastasia Miller	Superintendent – Deputy Head of Criminal Justice Services (WMP)
Allan Green	Superintendent – Crime Desk (WMP)

**Apologies:**

Jamie Grace	Vice-Chair of Ethics Panel
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<b>1</b>	<b>10:00</b>	<p><b><u>Welcome</u></b> The Chair opens the meeting, welcomes members and notes apologies of those absent.</p> <p>The Chair explains that Kerry Reidy has stepped down from the panel and that the panel thanks her for all her work on the panel over the past few years.</p>	<b>Marion Oswald</b>
<b>2</b>	<b>10:05</b>	<p><b><u>OPCC Update</u></b> The panel is updated that the recruitment pack and advert that was sent to members for comment has now been agreed and signed. The advert is scheduled to go out for three weeks from the 18<sup>th</sup> September with interviews and shortlisting scheduled for the end of October or start of November. The aim is for the new members to be appointed and in-post in time for the March 2026 meeting.</p>	<b>Simon Down</b>

		<p>Current members of the panel are invited to sit on the shortlisting and interview panels alongside the Chair and representatives from the OPCC and WMP. It is reiterated that there will be an increased focus on community representation in the recruitment alongside appropriate expertise and it is suggested that LPA commanders will be contacted with any recommendations they may have for local candidates in their communities.</p> <ul style="list-style-type: none"> <li>• A member asks how many new candidates they are looking to recruit, so which it is agreed that around five will be sought.</li> <li>• Various members express an interest in being on interview and shortlist panels and volunteer their time to do so.</li> <li>• A final member asks whether the potential for honorarium will be included in the advert. Initially it is suggested that it won't but after suggesting this may dissuade a number of suitable candidates it is agreed that this will be included in the advert.</li> </ul>	
3	10:15	<p><b><u>National AI Position</u></b></p> <p>The Presenter begins by explaining to the panel that before beginning the national AI position presentation, the Chair has requested comments on WMP's use of live facial recognition technology following a government expansion of LFR vans.</p> <p>The presenter explains that they sit on a national facial recognition board which is currently taking steps to coordinate a national position and establish an effective use of funding to create the capabilities for policing.</p> <p>The presenter continues by explaining that the three types of facial recognition are: retrospective where events have completed and later compared to the PND. WMP are one of the biggest users of this capability and the technology is well established and used nationally. Operator initiated where officers capture an image of an encounter and run it through the PND. It is distinct from retrospective by the fact it has the potential to have an impact on events in the present time. Very few forces have this capability, however. The presenter clarifies that if there is doubt over which type has been used, it will always be assumed to be OIFR as it is more intrusive.</p> <p>The presenter suggests that the national board is seeking to provide funding streams to expand the use of both these forms of facial recognition</p> <p>The third type is live facial recognition technology where a camera will capture someone's face, scan their biometrics, run it through a facial recognition list and then delete the image within a second. The presenter clarifies that the government has provided 10 vans with the capability as a national asset. The presenter clarifies that there will be some degree of consultation around necessary legislative changes as a result coming later in the year.</p>	Matt Welsted

	<p>The presenter suggests that WMP's position is to continue to be huge users of retrospective facial recognition as it is simple and effective at solving crime and keeping people safe. They have recently started using OIFR with draft guidance and policies coming shortly at a national level. The presenter suggests however, that WMP is not minded to use LFR but are scanning possible events in the future that may change this such as European football events.</p> <p><b>Questions and Responses</b></p> <p>A panel member asks how OIFR is triggered and what would it take in order to be used.</p> <ul style="list-style-type: none"> <li>The presenter suggests that this will be defined in future national policy but that it revolves around policing purpose. They give the example that if someone should be unconscious and unable to identify themselves.</li> </ul> <p>The panel member suggests that there are concerns that the line between the types of facial recognition could be softened and blurred, opening it up to be abused and suggests the national policy is needed.</p> <ul style="list-style-type: none"> <li>The presenter agrees and suggests that use-cases are currently being used to develop this stricter national policy.</li> </ul> <p>Another member then questions how this works in situations where individuals are under no obligation to provide personal details.</p> <ul style="list-style-type: none"> <li>The presenter explains that stop and search is explicitly excluded for those very reasons. They explain the guidance will also stop the use of CCTV and Body worn footage for OIFR and that it must be an active decision to use facial recognition.</li> </ul> <p>The member then adds a question about the private sector's use of this technology and how this will be interacted or dealt with.</p> <ul style="list-style-type: none"> <li>The presenter clarifies that WMP will not be sharing their images with private businesses no engage with their use of the technology. The presenter does however suggest that should companies be using this technology and are able to provide evidence through this use, that WMP would follow the evidence presented to them, albeit with a consideration of the legality of capturing the image.</li> </ul> <p>Another member references a recent study in which it was argued that the sample size upon which LFR has been tested is too small to support claims that the technology was absent of bias.</p> <ul style="list-style-type: none"> <li>The presenter suggests they have seen those reports but argues that the algorithms go through extensive testing and that the national board is satisfied that it is adequate.</li> </ul> <p>A further member inquires as to what data sets can the facial recognition be applied and compared to when seeking to identify someone.</p> <ul style="list-style-type: none"> <li>The presenter explains that, for the most part, it will be compared through the PND to the national custody database with roughly 19,000,000 subjects. It is only compared differently for LFR as this uses a smaller, purpose-built watch list with only specific people you may expect to find in a location. The</li> </ul>	
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		<p>presenter does however, add that legal conversations are going on about a future possibility to access further data sets such as immigration, driving licence and passports but that this is a controversial topic.</p> <p>Returning to the national AI position, the presenter explains that the UK wants to be a global leader of responsible AI use. As such a national direct working group has been established, acting as a cross public sector exploration of AI.</p> <p>Alongside this, the presenter explains how the NPCC has also created an AI working group. This group aims to identify opportunities in which AI can bring productivity benefits, ensure there is independent evaluation and uphold technical and security assurances. The presenter suggests as part of this, there is significant consultation with the CPS and engagement with the judiciary to make sure AI products and their impact on the CJS are understood before being introduced.</p> <p>The presenter continues by explaining the first projects considered by this group are to be decision-informing tools such as drafting tools and object recognition technology. It will also seek to explore methods of accreditation for such tools.</p> <p>The presenter explains how AI is developing in policing in three ways: AI being created within forces; LLMs being adapted for police use; AI being bought from third parties. A notable example of third-party AI WMP has engaged with is Microsoft Co-Pilot which the presenter explains has received national assurance whilst Microsoft 365 will be used once it receives national assurance on the 18<sup>th</sup> September.</p> <p>The presenter assures the committee, however, that within WMP, any AI tools or product will be submitted via a decision paper to the change board before being introduced whilst IT will map any already in use. The presenter also confirms that WMP are working to develop their own AI tools but suggests the approach in both regards will remain cautious.</p> <p><b>Questions and Responses</b></p> <p>A panel member inquires as to who has been consulted over the use of particularly, interpreting and translating AI tools, suggesting that the Law Society should be included.</p> <ul style="list-style-type: none"> <li>• The presenter welcomes the point and suggests that they are currently very much in the process of establishing who needs to be consulted in order to test and accredit the tools.</li> </ul> <p>Another member follows up on this, asking whether force level AI projects will be submitted to the national assurance framework or whether this will be contained within a more local decision-making framework.</p> <ul style="list-style-type: none"> <li>• The presenter explains that it is difficult to control what other forces are doing due to their level of autonomy but suggests that the board would encourage forces to adhere to a central register of AI to create awareness of what forces are doing.</li> </ul>	
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4	11:00	<p><b><u>Operation Snap</u></b></p> <p>The presenter begins by explaining the operation is an NPCC initiative which forces sign up to. It allows the public to send in video footage capturing traffic offences directly to WMP which will then be reviewed and offer outcomes such as fines, warning letters, licence points, educational courses etc. The results of these outcomes are then published quarterly.</p> <p>The presenter explains that 208 submissions were received in the first year of recording but has risen to 16,000 submissions in 2024. As a result of the increase in demand, a prioritisation filter has been applied to the submissions, meaning the most serious and dangerous offences are dealt with first: dangerous driving; using a mobile phone; not wearing a seatbelt; not complying with a red light; school parking; other parking offences; all other offences.</p> <p>The presenter continues by informing the panel that submissions must be reviewed within 14 days so will be prioritised via the filter to ensure that high-harm incidents are not dismissed due to lack of time or resource.</p>	Tanya Johnson

	<p>Taking the panel through the submission process, the presenter explains that once the public have uploaded the footage they must write a witness statement and may be expected to appear in court as a result. Included within this is the option to include aggravating features which may increase the harm of the offence such as occurring in a built-up area or in wet conditions.</p> <p>Performance wise, the presenter reveals that positive outcome rates are consistently high and that NFA results only significantly increase at times of low resource. Correspondingly, the main reason for NFA results is reviews not being completed within 14 days. Other common reasons include submission of incidents which take place in other force areas or the submission not having included the footage.</p> <p>The presenter continues by explaining that in instances where submissions are not reviewed in time, the subject will be issued a warning letter in an attempt to achieve some positive action and reinforcement.</p> <p>To demonstrate the project's contribution to vision zero, the presenter highlights how before Op Snap, Dudley's Merry Hill car park received 48 weekly incidents of ASB and vehicle crime whereas now, it averages 28 weekly incidents. Furthermore, the presenter explains how it has led to a reduction of incidents involving five cars or more from 50% to 23%.</p> <p>The presenter concludes by discussing the issue of proactive reporters, certain members of the public who are deliberately seeking out crimes to report through the operation. One example is a single individual who has submitted over 700 videos alone. The presenter clarifies this is not the intention of the operation which is meant to be used far more passively.</p> <p><b>Questions and Responses</b></p> <p>One member asks how many people it takes to review all the submissions that come in.</p> <ul style="list-style-type: none"> <li>• The presenter explains a team of eight PCs and one sergeant and that they get through roughly 2100 submissions a month.</li> </ul> <p>Another member expresses concerns about the potential for mission creep within the project, particularly towards ASB and may, consequently encourage pro-active reporters.</p> <ul style="list-style-type: none"> <li>• The presenter agrees that the purpose of the operation is not to encourage people to go out seeking things to report and certainly not put themselves in harm's way.</li> <li>• In regards to the mission creep towards ASB, the presenter explains that work against road offences and ASB both contribute to the vision zero strategy that Op Snap aspires to. The presenter also clarifies that if any other crime is submitted it will be passed on to an appropriate team.</li> </ul> <p>The member continues by suggesting that the submitter having to write a witness statement and potentially having to appear in court as a</p>	
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	<p>witness may act as a significant deterrent to reporting. Instead, the member advises the ability to submit audio instead of writing may be a way to avoid this.</p> <ul style="list-style-type: none"> <li>• The presenter responds by explaining that whilst they would advocate for the submitter to make a witness statement and attend court but that there is the possibility for an officer to do so on the person's behalf.</li> </ul> <p>A member seeks clarification as to whether a system is in place for escalation of warning letters for repeat offenders.</p> <ul style="list-style-type: none"> <li>• The presenter explains that this is indeed in place to ensure the penalty is escalated should the subject have had a previous warning letter.</li> </ul> <p>Separately, a member mentions the potential for systematic bias and emphasises the need to consider who is receiving NFA responses and who is receiving penalties in order to limit this. As such, they suggest an evaluation be done to look at the communities most affected by the operation.</p> <ul style="list-style-type: none"> <li>• The presenter responds that they will take the suggestion away to consider but offers reassurance that the NFA decisions are governed by legislation which is likely to limit any bias.</li> </ul> <p>Another member inquires as to whether any consideration has been given to those who may be unfamiliar or uncomfortable with the necessary technology needed to take or submit videos and asks if there is any training provision.</p> <ul style="list-style-type: none"> <li>• The presenter explains that the team does actually go out to meet with communities and deliver training on the operation as well as providing information on what makes the best video and evidence.</li> </ul> <p>One member continues by inquiring as to the reason for a number of spikes in the NFA rate in the data.</p> <ul style="list-style-type: none"> <li>• The presenter explains that this is due to two reasons: the first being that a number of capacity issues meant the 14-day response was not met and subsequently had to be NFA. The second reason was due to submissions from other force areas being newly recorded as NFA.</li> </ul> <p>The member follows on by asking whether the subjects of submissions who are not reviewed within the 14 days are automatically issued with a warning letter.</p> <ul style="list-style-type: none"> <li>• The presenter confirms that this is the case.</li> </ul> <p>The member concludes by asking about the prevalence of cycle-cam footage in the submissions.</p> <ul style="list-style-type: none"> <li>• The presenter explains that whilst they do receive cycle-cam footage into Op Snap, that most of WMP's attention towards cyclists comes instead, from Operation Close Pass and regularly engage with local cycling networks through that operation.</li> </ul>	
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5	11:45	<b><u>Break</u></b>	
8	12:40	<p><b><u>Panel Recommendations</u></b></p> <p><b>Operation Snap:</b> The Panel express concern over potential for inadvertent bias. A member suggests that an evaluation should take place, particularly examining who is receiving NFA results compared to who is receiving warnings and fines. They suggest this should seek to identify whether there are any patterns in regard to demographics and responses as well as any indication as to why these patterns may have developed.</p> <p>The Panel agrees that there needs to be a concerted effort to avoid encouraging proactive reporting through Op Snap. In particular, it is suggested that local neighbourhood teams could visit those members of the public identified as prolific and proactive reporters in an attempt to understand their concerns and the issues that prompt such reporting practices.</p> <p>One member explains that the submission of an incident through Op Snap requiring the reporter to write a witness statement could be a disincentive for them to submit a report and instead, suggests that alternative methods could be introduced. The examples given are the ability for the witness to voice record a message or interact with a chatbot in order to submit the same statement but in a more inclusive manner.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>The panel recommend an evaluation of Op Snap's potential for inadvertent bias should be commissioned to ensure that outcomes are consistent across demographics.</li> <li>The panel further recommends that neighbourhood teams interact with prolific and proactive reporters in order to ensure that WMP are not encouraging the public to take up police issues and to maintain the true, intended purpose of the operation.</li> <li>The panel express concerns surrounding those reports which are not reviewed within the 14 days receiving a written warning as default and suggest this be changed.</li> </ul>	Marion Oswald
9	12:55	<p><b><u>Any Other Business</u></b> N/A</p>	Marion Oswald



west midlands  
police and crime  
commissioner

10	13:00	<b><u>Meeting Close</u></b> Next Meeting: 26 <sup>th</sup> November 2025	
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