National Analytics Solution project team:

Response to The Alan Turing Institute and IDEPP

In January 2017, a consortium of law enforcement bodies, led by West Midlands Police, came together to produce a high level design for how advanced analytics could be utilised within a national law enforcement context to prevent harm, reduce criminality and protect the vulnerable.

The initiative was born of a need to drive greater efficiency and long-term sustainability by focusing on addressing priority issues which will deliver the greatest benefit for UK policing; challenges that multiple forces face, or issues that are difficult to address locally due to inter-operability issues or a lack of data. It was deemed important that a common solution and approach be undertaken – focusing on solving issues once – rather than in multiple ways.

Whilst advanced analytics techniques have been broadly applied throughout industry, it is still a relatively new concept within policing. Transparency and legitimacy is of the upmost importance to the successful deployment of analytics within public safety and as such, the project group were keen to engage key stakeholders to help understand how to form the appropriate structures to ensure effective oversight of the solution as we develop a more detailed design.

The project approached the Alan Turing Institute Data Ethics Group (ATI DEG) and invited the group to review the high level strategy to help us to understand how a suitable ethical framework could be applied to this approach. Helpfully, the team have gone further than we had expected to provide us with a full ethical review of the Detail Business Case (DBC) produced by the project team that described how a national analytics solution could operate. For this, we are extremely grateful.

The ATI DEG, through their professional relationships, were also able to engage with the Independent Digital Ethics Panel for Policing (IDEPP) who also considered the DBC. The result of this analysis is continued within the attached document entitled," ETHICS ADVISORY REPORT on Police Transformation Fund – National Analytics Solution, Draft v.5.0 (15/03/17) ADVISORY OBSERVATIONS BY THE INDEPENDENT DIGITAL ETHICS PANEL FOR POLICING (IDEPP) AND THE ALAN TURING INSTITUTE DATA ETHICS GROUP (ATI DEG)." (Ethics Advisory Report)

This work was undertaken free of charge and as such, the project team and its respective executive sponsors from the law enforcement agencies that supported the bid, express their thanks for the work undertaken in completing the report. This is a hugely important piece of work as it helps to move the debate forward into how we can effectively build upon the high-level plan developed in the initial phase, expressing a strategic intent and direction, to develop an ethical approach within the detailed design of how the platform will work from a technology perspective, how the group that supports this will operate and how this will all be governed.

When the ATI DEG and IDEPP undertook to conduct the review of the DBC it was agreed that while the project would always look to make the findings of the report public, it would be necessary to review the report once completed to come to an agreement on what could be published. We are happy to publish the report in full. At times, the Ethics Advisory Report raises concerns and challenges around the scope and specificity of the plans and approaches to mitigate those risks. The team welcomes these comments. The DBC was never intended to provide a detailed plan but rather a summary of an approach that could be undertaken and within the document it identified that more detailed work would be needed in relation to ethics.

It was our hope that the review to be undertaken could highlight where further development was needed and this review has helped us all to do that, underscoring where further focus is required.

One point that will require further discussion and broader societal consultation – as the reach and impact is broader than this solution – is around the "traditional role of the police". The project would suggest that the traditional role of policing will not change but that it will extend as we move forwards. The threat from new and emerging crime types, many driven by the development of technology coupled with the challenges of austerity means that law enforcement agencies will be expected to offer protection to the public across a broader landscape than ever before. The project believes that the best way to address this issue to is to have an evidence base for decision making derived from strong data resources and capabilities.

We would like to highlight one comment that we disagree with. On page 12 of the IDEPP report reference is made to taking "law enforcement away from its traditional crime-related role and into areas of social and public policy that require explanation, justification and legitimation, especially where the ethical dimensions and principles of such policing roles are not well established." We believe that this does not reflect the modern service that is offered to the public. While the core function of the Police is the prevention and detection of crime there are numerous areas where we invest resource not directly linked to this such as – inter alia - locating missing persons, dealing with people in crisis with mental health issues (often as a joint team with health services), road traffic accidents including fatalities where there is no element of criminal activity, dealing with the homeless, responding to suicide, domestic abuse where there is no recordable crime and dealing with anti-social behaviour issues that do not constitute crime but nevertheless have the ability to have a significant impact on the quality of life of the public affected by them.

This thinking is reflected in publications from the College of Policing Publication[1] examining the process of estimating the demand on the police service: "Police recorded crime, as reflected in the main performance statistics, can only represent part of the police workload. While it presents an indication of an aspect of reactive demand to which the police respond, there are many types of work, both reactive and proactive the police undertake, both as statutory duty and by common convention, which do not feature as reports of crime - and which therefore do not appear in assessments of demand using police recorded crime data."

To help the police in the breadth of their activities, we are looking to develop and advance our understanding of these issues to enable us to be more efficient in our prevention and intervention work, including on topics that are front of mind to many such as gaining greater insight into an understanding of serious violence.

As stated previously, we welcome the commentary contained in this review and we are fully committed to deploying significant resources in further exploring the ethical issue. The project recognises that significant effort is needed to fully understand and manage the ethical implication of the use of data science in law enforcement. In addition to this the project is also cognisant that since the time that the original business case was drafted that there have been both legislative changes and lessons learnt in relation to the use of advance technologies by the public sector.

1 http://www.college.police.uk/News/Collegenews/Documents/Demand%20Report%2023_1_15_noBleed.pdf

As such the project team would like to highlight the addition ethical safeguards that we in tend to implement in the next stage of the project. These include the use of appropriate Impact Assessments, the implementation of a process that ensures that any output from the proof of concept work is regularly reviewed considering its effectiveness and proportionality as well as a full ethical review by appropriate independent persons in relation to the all work that is conducted in the next phase of the project. The project believes that the use of these approaches and tools is the correct approach to take given the increasingly complex challenges that law enforcement agencies are faced with in order to protect the public. These approaches and tools, coupled with a strong ethical oversight, will mean that policing can continue to be delivered with the approval of the public but in a more informed and efficient way. To fail to take the opportunity that technology offers is to fail the public we serve by misusing the resources they provide policing with.

We remain committed to working with you on this critical issue, continuing the debate and striving to make the world a better place for all members of society.