



Response Date: 29/04/2025

2025/289 - Use of BriefCam and AI-Based Video Analytics

In response to your recent request for information regarding;

1. **Does your force currently use or has it previously used BriefCam video analytics software?** No
 - **If yes, in what capacity has it been used (object tracking, video summarization, facial recognition)?** N/A
 - **If yes, please provide the date of the start (and of the end if relevant) of use.** N/A
2. **Has your force trialed or tested BriefCam? If so, when did the trials begin, and what were the objectives?** No
3. **Has your force entered into any contracts or agreements related to BriefCam software?** No
 - **If yes, please provide the total cost of any purchases or subscriptions since January the 1st 2020.** N/A
4. **Has your force used any video analytics software capable of facial recognition, object tracking, or crowd monitoring? If so, which ones?**

Neoface through South Wales Police for advisory facial recognition
AECOM through National Highways for object recognition

5. **Has your force trialed or tested any AI-based surveillance tools since January the 1st 2022?**

Kinesense LE on trial for approx. a year which ended May 2022.

Neoface for advisory facial recognition was used at Holyhead Port and Wrexham Football Stadium

AECOM through National Highways for in car object recognition (mobile phones and Seatbelts)

If so, please provide any available reports, evaluations, or risk assessments related to these trials.

Kinesense LE was agreed through the Digital Innovation Board which has been disbanded. No documents relating to this trial held due to people moving and leaving.

Facial recognition at port and A55 object recognition were reviewed by the AI Governance board to ensure compliance with the AI Usage Policy as well as being submitted to information Assurance, Diversity.

The FR at Wrexham went through the same bodies and was also run under the auspices of the, then new, Live Facial Recognition Operations Working Group

Please find attached the AI Usage Policy (which is currently under review)

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 11/03/2025



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

AI Usage Policy

Governance:	Strategic Management Board		
Document Type:	Policy		
Policy Owner:	Head of Corporate Services		
Department:	Corporate Services Business Intelligence		
Policy Writer:	Advanced Analytics and AI Lead		
Policy Number:	037	Version:	1.1
Effective Date:	25/09/2023		
Recommended Review Date:	25/09/2024		

POLICY

CHANGE HISTORY				
Version No	Author	Changes	Ratification	Date
1.1	...	Updated to reflect changes of names of boards and change name from PAMLAI to AI		

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1. WHY IS THIS POLICY REQUIRED?

This policy will

- 1.1 Reduce the number of risks associated with **Predictive Analytics**, **Machine Learning**, **Artificial Intelligence**, and related technologies (hereinafter referred to as **AI** technology).
- 1.2 Lower the high level of risk associated with the use of **AI** technology.
- 1.3 Minimise the danger of large-scale reputational damage experienced by others for not having an appropriate policy in place.
- 1.4 Ensure that any AI technology in use is created, sourced, and used ethically.
- 1.5 Ensure that any AI technology used will be *benevolent*.
- 1.6 Ensure that there is *accountability* for the
 - Creation of AI technology.
 - Purchase of AI technology.
 - Use of AI technology.
 - Maintenance of AI technology
- 1.7 Ensure that any AI technology used is *robust*.
- 1.8 Help to avoid biases inherent in AI work.
- 1.9 Help to avoid injecting biases into AI work.
- 1.10 Ensure compliance with the NPCC guidelines (ALGOCARE).
- 1.11 Facilitate compliance with UK National, and European legislation.

2. WHO SHOULD USE THIS POLICY?

- 2.1 This policy should be used by NWP officers, special constables, police community support officers, police staff, volunteers, and anyone under contract to NWP (e.g. agency staff). considering the creation, purchase, rental, use or deployment of AI technology, including the use of AI technology from the public domain.
- 2.2 This policy includes:
 - Direction, together with relevant information outlining how the force should approach the use of AI technologies.
 - Procedures for different types of AI work.
 - The levels of authorisation for different types and categories of AI work
 - Links to relevant documents and guidance.

3. WHAT SHOULD I CONSIDER WHEN USING THIS POLICY?

It is intended that the process outlined in this AI Ethics policy should start at the initiation phase of any programme or project that will make use of AI technology, or as soon thereafter as it is ascertained that a project will involve the use of AI technology.

The terms **piece of work**, **proposal** and **project** will be used to refer to the project, programme, or part thereof, for which this policy is being consulted.

The term **process** will refer to the **activities outlined herein**.

This policy should be used in conjunction with the AI ethics code, tick list, and guidance notes:

3.1 The AI Ethics Code

The entire ethics code can be found in Appendix D but the main headings are summarised here to give context:

Summary of Code of Ethics

*When considering the initial, or continued, use of **AI** (Predictive Analytics, Machine Learning, Artificial Intelligence) or other data reliant technologies, in order to maximise the benefits and minimise the associated risks, it is imperative that it not just be ethical, but that it be seen to be ethical i.e. that it be demonstrably trustworthy.*

*To be trustworthy a AI technology must have three qualities, it must be: **BENEVOLENT**, **ACCOUNTABLE**, and **ROBUST**.*

To demonstrate these qualities there is a minimum set of principles that must be upheld.

TRUSTWORTHINESS

To be trustworthy a AI technology must be benevolent, accountable, and robust:

1. Benevolent

- a. Seeks to do good (BENEVOLENCE: Purpose)
- b. Is free from prejudice (BENEVOLENCE: Fairness)
- c. Respects privacy (BENEVOLENCE: Privacy)

2. Accountable

- a. Adheres to the law and regulations pertaining to its use (ACCOUNTABILITY: Lawfulness)
- b. Must not deceive, deliberately or otherwise (ACCOUNTABILITY: Honesty)
- c. Is subject to continued external oversight (ACCOUNTABILITY: Scrutiny)
- d. The method for decision making can be explained (ACCOUNTABILITY: Transparency)

3. Robust

- a. Is reliable (ROBUSTNESS: Reliability)
- b. Keeps data secure (ROBUSTNESS: Security)
- c. Corrects bias (ROBUSTNESS: Unbiased)

The principles derived from the qualities required for trustworthiness can be further broken into several tenets to test the ethics of any piece of work connected to AI technology. The breakdown can be found in the Appendix D.

3.2 The AI Ticklist can be found in Appendix E

3.3 The AI Use Case and Guidance can be found Appendix F

This policy, the AI ethics code, Ticklist, and guidance notes will be available in both English and Welsh versions.

4. ROLES AND RESPONSIBILITIES

The authorisation hierarchy can be seen in Appendix A

4.1 AI Ethics Process Initiator	The person or group who initiate the AI Ethics policy process with a proposal for a project or programme that involves collaborating on, using, creating, renting, or purchasing some element of AI technology
4.2 AI Facilitator	Carries out first line checks that the process initiator has considered the ethicality and full ramifications of the proposed work and can authorise some work (up to level 2). The AI Facilitator will be able to speak Welsh at level 3 or above.
4.3 AI Ethics Group (AIG)	Has oversight of the work carried out by the initiator and facilitator, and can authorise some work (up to level 3)
4.4 Assurance Board	Has oversight of the work carried out by the initiator and facilitator, and AIG and can authorise some work (up to level 4)
4.5 Senior Management Board	Overall authorisation of high risk, complex, and collaborative projects (level 5)

AI projects generally fall into one of four categories, each being associated with different levels of risk. The level required to authorise each type of work is shown in the diagram below, along with a list of criteria that define what fits into each category:

Hierarchy of Authorising Bodies

Lowest → Highest

Risk	Accountability Authority		Project Initiator	PAMLAI Project Worker	AI Group	Assurance Board	SLT
Low	Ad hoc	Small scale	A				
		and exploratory					
		and temporary					
		and simple					
		and only certified data from the datawarehouse					
	Operationalised	and non-operational					
		and not shared beyond author					
		or Procedural assistance required					
		or Data is uncertified or from outside data warehouse		A			
		or Shared with manager or team mates					
Medium	Operationalised	Any operational use					
		or Requires monitoring					
		or Non trivial scale					
		or Results shared beyond manager team					
		or Some complexity					
	Acquisitions	or Escalated by previous hierarchy					
		Third (3rd) party services					
		or Third (3rd) party products					
		or Third (3rd) party software					
		or Proprietary test data					
High	Collaborative	or Any reputational risk					
		Significant reputational risk					
		or Third party data collaboration					
		or Third party analytical collaboration					
		or legal or financial risk					
		or high complexity					
		or large scale					

5. THE PROCESS

At the outset of every programme or project a self-assessment must be made by the originator of the piece of work as to whether it will use any AI technology. If it will then, the AI Ethics policy process (hereafter referred to as the process) will need to be followed. Likewise, if a publically available tool uses AI technology then the process should also be followed.

The process begins with an assessment, by the project's originator, of the category of work being undertaken. The authorisation hierarchy matrix should then be used to determine the level of authorisation required. Assistance may be sought from the AI facilitator in this assessment.

The request will flow through the authorising bodies as in Appendix A. the process is designed to be iterative to enable feedback to be incorporated in order to facilitate the authorisation of acceptable proposals

If authorisation is required or desired, then the piece of work will be registered using the AI registration form (see Appendix G)

The process should be followed for each part of the proposed project that uses a different AI technology or that uses the same types of AI technology for different tasks.

e.g. a large programme involving text analysis for summarising statements, text analysis for sentiment analysis, facial recognition should assess the ethicality of each technology and use combination i.e. 3 items to consider in this example.

The AI Ethics Policy Process begins once it is noticed that there will be some element or use of AI technology involved in any given project.

The actions for each role in the process are listed below. A detailed visual process map can be found in Appendix C

5.1 AI Process: Initiation

Role	Action Required
5.1.1 Proposal Initiator	Use the AI Ethics code and Ticklist to determine whether the work should proceed, and if so, then register the proposed work using the online form (see Appendix G)
5.1.2 Proposal Initiator	Use the AI Authorisation Matrix to determine whether authorisation is required.
5.1.3 Proposal Initiator	Ask the AI Facilitator for guidance on how to use the Ticklist if desired.
5.1.4 Proposal Initiator	If guidance is desired, submit a request to the AIG using the online form with a partially completed AI Ticklist.
5.1.5 Proposal Initiator	Use the AI Authorisation Matrix to determine the required authorisation level.

5.1.6	Proposal Initiator	Submit the completed AI Ticklist to the AIG.
5.1.7	Proposal Initiator	Await response
5.1.8	Proposal Initiator	Amend the proposal as required by a more senior authorising body.
5.1.9	Proposal Initiator	If authorised, proceed with the proposal under the oversight of the AIG

5.1 AI Process: **Guidance**

Role	Action Required
5.1.10 AI Project Facilitator	Upon receipt of a request provide guidance to the proposal initiator.
5.1.11 AI Project Facilitator	Use the AI Ethics code and Tick-list to determine whether the work should proceed.
5.1.12 AI Project Facilitator	Use the AI Authorisation Matrix (Appendix B) to determine what level of authorisation is required or refer to the AI facilitator.
5.1.13 AI Project Facilitator	Recommend required changes to the project proposal.

5.2 AI Process: **Oversight, Authorisation, or Escalation**

Role	Action Required
5.2.1 AIG (Artificial Intelligence Group)	Each member of the AIG will interpret the AI Ethics code and Ticklist in the light of their own domain of expertise (legal, technical, operational, compliance etc) and the AI guidance notes to determine whether the request should proceed.
5.2.2 AIG	Where there is difficulty in determining whether the request should proceed, the AI Board should gather the opinions of appropriate experts, and use the insights gleaned to interpret the AI Ethics code and Ticklist to determine whether the request should proceed.
5.2.3 AIG	Where necessary request amendments from the Proposal Initiator
5.2.4 AIG	If, based on the AI Authorisation Matrix (Appendix B)or situational judgement, a higher level of authorisation is required or desired, forward the proposal, Ticklist and notes to the Assurance Board

5.3 AI Process: **Authorisation or escalation**

Role	Action Required
5.3.1 AB (Assurance Board)	In the light of the information gleaned from the AIG investigation, AI Ticklist, Ethics Code, and Guidance Notes, determine whether the work should proceed.
5.3.2 AB	Where there is difficulty in determining whether the work should proceed, request AIG gather further information from appropriate experts and resubmit once the fresh information is gathered
5.3.3 AB	Where necessary request amendments from the Proposal Initiator
5.3.4 AB	If the proposal is fundamentally unsound, end the proposal

5.3.5 AB	If based on the Authorisation Matrix, or situational judgement a higher level of authorisation is required or desired, forward the proposal, Ticklist and notes to the Senior Management Board (SMB)
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5.4 AI Process: Authorisation

Role	Action Required
5.4.1 SMB (Senior Management Board)	In the light of the information gleaned from the AB, AIG investigation, AI Ticklist, Ethics Code, and Guidance Notes, determine whether the work should proceed.
5.4.2 SMB	Where there is difficulty in determining whether the work should proceed, request AIG gather further information from appropriate experts for resubmission once the fresh information is gathered
5.4.3 SMB	Where necessary request amendments from the Proposal Initiator
5.4.4 SMB	If the proposal is fundamentally unsound, or undesirable, then reject the proposal
5.4.5 SMB	Authorise the work

6. DECLARATION & LEGALITIES

- 6.1 In line with all Force policies, the overarching purpose of this document is to directly support the PCC police and crime plan objectives. Overall, the intention of this policy is to make North Wales the safest place in the UK.
- 6.2 In the writing of this policy cognisance has been taken of the college of policing code of ethics (2014) and proposed revisions (2023).
- 6.3 North Wales Police policies will be written in accordance with the approved corporate format and published on the Force Intranet, allowing access to staff and public, where appropriate, on the pages of the public facing Internet site under the Force publication scheme and Freedom of Information Act 2000.
- 6.4 The following main legal requirements and regulatory have been identified within this policy:
- Equality Act 2010
 - Human Rights Act 1998
 - The Welsh Language (Wales) Measure 2011 and the Welsh Language Standards for the Chief Constable
 - Data Protection Act 2018 (schedule 8) (UK GDPR)
 - Freedom of Information Act 2000
 - Health and Safety Act 1974
 - The General Data Protection Regulation 2016/679
 - Data Protection and Digital Information (No. 2) Bill March 2023
 - CDDO Algorithmic Transparency Recording Standard
 - European Convention on Human Rights (ECHR)
 - EU Artificial Intelligence (AI) Act 2021
- 6.5 Recommendations from following bodies have been consulted for this policy:
- Centre for Artificial (CAIDP) and Office for Artificial Intelligence
 - CAIDP, UNESCO, ELI CDDO, CDEI recommendations
 - European Law institute (ELI)
 - Central Digital and Data Office (CDDO)

- Centre for Data Ethics and Innovation (CDEI)
- Privacy international
- National Institute of Standards and Technology (NIST)
- Royal United Services Institute (RUSI)
- National Police Chiefs Council (NPCC)
- College of Policing (CoP)

6.6 This policy has been written giving due regard to the above legislation and has considered the risk of unfair and/or disproportionate impacts on individuals or groups (actual or perceived) and has done so via an equality impact assessment (EIA) and a Welsh Language Impact Assessment (WLIA).

6.7 The area of AI ethics laws, regulations, and recommendations is very active, and changes are expected to be frequent. Changing legislation and deeper understanding of the topic will necessitate regular reviews of this policy document to ensure continued compliance and best practise.

7. APPENDICIES

7.1 Appendix A – Authorisation Levels

The proposal will be considered by the following bodies in the order shown below to the level required according to the Authorisation Matrix (Appendix B). The steps in yellow are only required in some cases.

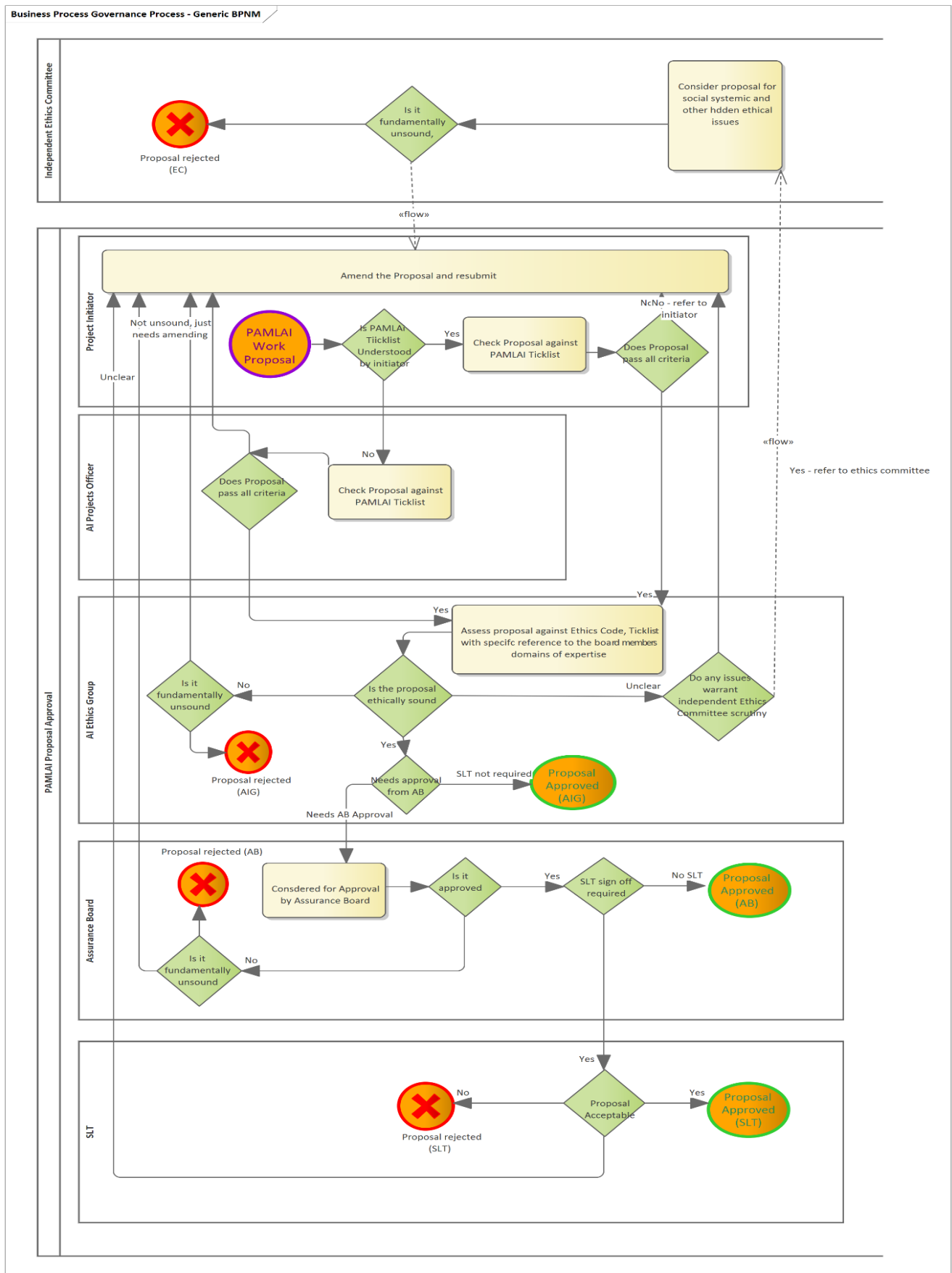


7.2 Appendix B - Authorisation Matrix

Hierarchy of Authorising Bodies
Lowest → Highest

Risk	Accountability Authority		Project Initiator	PAMLAI Project Worker	AI Group	Assurance Board	SLT
Low	Ad hoc	Small scale	A				
		and exploratory					
		and temporary					
		and simple					
		and only certified data from the datawarehouse					
		and non-operational		A			
		and not shared beyond author					
		or Procedural assistance required					
		or Data is uncertified or from outside data warehouse					
		or Shared with manager or team mates					
	Operationalised	Any operational use			A		
		or Requires monitoring					
		or Non trivial scale					
		or Results shared beyond manager team					
		or Some complexity					
		or Escalated by previous hierarchy					
	Acquisitions	Third (3rd) party services				A	
		or Third (3rd) party products					
		or Third (3rd) party software					
		or Proprietary test data					
		or Any reputational risk					
	Collaborative	Significant reputational risk					A
		or Third party data collaboration					
		or Third party analytical collaboration					
		or legal or financial risk					
		or high complexity					
High		or large scale					

7.3 Appendix C – Detailed Process Map



7.4 Appendix D – AI Ethics Code

Embedded File



PAMLAI Ethics Code
(PEC) v0.4 - English .

7.5 Appendix E – AI Ticklist

Embedded File



PAMLAI-Ticklist
(PET) v0.3 - English.c

7.6 Appendix G – Sample Registration Form



Example of
registration form - fill

7.7 Appendix H – Terminology

The following abbreviations are used

Term	Meaning
AI technology	Predictive Analytics', Machine Learning, Artificial Intelligence, and related technologies
SMB	Senior Management Board (highest authorising body)
AB	Assurance Board – policy based decision making board
AIG	Artificial Intelligence group - Deals with AI matters including the ethicality of proposals
PF	AI facilitator – AI / Ethics expert capable of providing guidance to those using the AI Ticklist
PI	Proposal initiator – the individual or group making the proposal