



HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

Response Date: 17/10/2025

2025/950 - Artificial intelligence (AI) technology

In response to your recent request for information regarding;

1) AI Systems in use

A list of tools, platforms or systems currently deployed or being piloted/trialled.

The purpose and function of each of the above.

Dataiku DSS – MLOps tool to allow monitoring and remediation of ML solutions that we create

Co-pilot – partially enabled as a trial

LFR for events on mutual aid from SWP was only deployed for major scenes/events

Object detection in vehicles (national highways)

The departments or services where these are operational.

2) Procurement and development

Details of any contracts, tenders or partnerships with external providers for AI solutions.

LFR for events on mutual aid from SWP

Object detection in vehicles (national highways)

No others AI solutions only tools (e.g. Dataiku DSS to enable us to build our own solutions)

Total expenditure on AI related technologies over the past three financial years, broken down by year.

~120k on MLOps platform 2025

3) Governance and Ethical Oversight

Copies of, or information relating to, any internal policies, frameworks or guidance documents relating to the use of AI.

Any ethical review processes or risk assessments conducted prior to deployment.

Details of any group responsible for the oversight of AI use within your organisation.

Documents

AI Usage policy (see attached shareable version)

Currently under review

Boards

Artificial Intelligence Governance Board

Joint Audit Committee

Ethics Committee

4) Impact on Workforce

Any assessments, reports or internal communications regarding the impact of AI on staffing levels, job roles or workforce planning (including recruitment, redundancy).

Talk given to all Senior Management Teams on most potential dangers of AI

Pencadlys yr Heddlu,
Glan-y-Don, Bae Colwyn LL29 8AW
www.heddlugogleddcymru.police.uk

Police Headquarters,
Glan-y-Don, Colwyn Bay LL29 8AW
www.northwales.police.uk

Yn gwneud Gogledd Cymru'r lle mwyaf diogel i fyw, gweithio ac ymweld yn y DU
Making North Wales the safest place to live, work and visit in the UK

Information on any roles that have been automated, restructured or made redundant due to AI implementation.

None yet

Additional staff required to implement one AI solution

Details of any training, redeployment or upskilling initiatives offered to staff in response to the adoption of AI.

Central Analysts and 1 departmental analyst sent on Dataiku DSS training

10 DataCamp licenses purchased for self-paced learning in data and AI

Udemy courses offered on request

Any consultations with trade unions or staff representatives regarding AI-related changes.

AI usage policy was sent for consultation to UNISON, Police federation

Meeting with UNISON reps to discuss impact and potential impact on business and staff

5) Performance and Evaluation

Evaluations, audits or performance reviews of AI systems, as referenced in section 1.

Evidence of how AI systems have affected service delivery, decision-making or operational efficiency.

Operational deployment on A5 of mobile phone detector.

6) Data protection and privacy

Types of data used to train or operate AI systems, including whether this data is synthetic or not.

Measures in place to ensure compliance with data protection legislation, including the DPA 2018 and UK GDPR.

Only anonymised data with no PII had been used to train any model. No protected characteristics have been included, AI Policy ensures compliance with UK, EU and global standards

Procedures for handling bias, transparency and accountability in AI decision-making.

Dataiku MLOps platform facilitates bias, and drift detection in data and models and, once detected, also allows automated flagging or remediation. Furthermore, the MLOps platform also attempts to provide explanation for AI decision making and aids governance through project tracking.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 11/09/2025



**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		

CONTENTS

1. WHY IS THIS POLICY REQUIRED?	3
2. WHO SHOULD USE THIS POLICY?	3
3. WHAT SHOULD I CONSIDER WHEN USING THIS POLICY?	3
3.1 The AI Ethics Code	4
<i>The entire ethics code can be found in Appendix D but the main headings are summarised here to give context:</i>	<i>4</i>
Summary of Code of Ethics	4
3.2 The AI Ticklist can be found in Appendix E	4
3.3 The AI Use Case and Guidance can be found Appendix F	4
4. ROLES AND RESPONSIBILITIES	5
4.1 AI Ethics Process Initiator	5
4.2 AI Facilitator	5
4.3 AI Ethics Group (AIG)	5
4.4 Assurance Board	5
4.5 Senior Management Board	5
5. THE PROCESS	6
5.1 AI Process: Initiation	6
5.1 AI Process: Guidance	7
5.2 AI Process: Oversight, Authorisation, or Escalation	7
5.3 AI Process: Authorisation or escalation	7
5.4 AI Process: Authorisation	8
6. DECLARATION & LEGALITIES	8
7. APPENDICIES	10
7.1 Appendix A – Authorisation Levels	10
7.2 Appendix B - Authorisation Matrix	11
7.3 Appendix C – Detailed Process Map	12
7.4 Appendix D – AI Ethics Code	13
7.5 Appendix E – AI Ticklist	13
7.6 Appendix F – AI Guidance	Error! Bookmark not defined.
7.7 Appendix G – Sample Registration Form	13
7.8 Appendix H – Terminology	13

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	A				
	Small scale					
	and exploratory					
	and temporary					
	and simple					
	and only certified data from the datawarehouse					
	and non-operational					
	and not shared beyond author					
	or Procedural assistance required		A			
	or Data is uncertified or from outside data warehouse					
	or Shared with manager or team mates					
Medium	Operationalised			A		
	Any operational use					
	or Requires monitoring					
	or Non trivial scale					
	or Results shared beyond manager team					
	or Some complexity					
	or Escalated by previous hierarchy					
	Acquisitions				A	
	Third (3rd) party services					
	or Third (3rd) party products					
High	or Third (3rd) party software					
	or Proprietary test data					
	or Any reputational risk					
	Collaborative					A
	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)
----------	--

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.

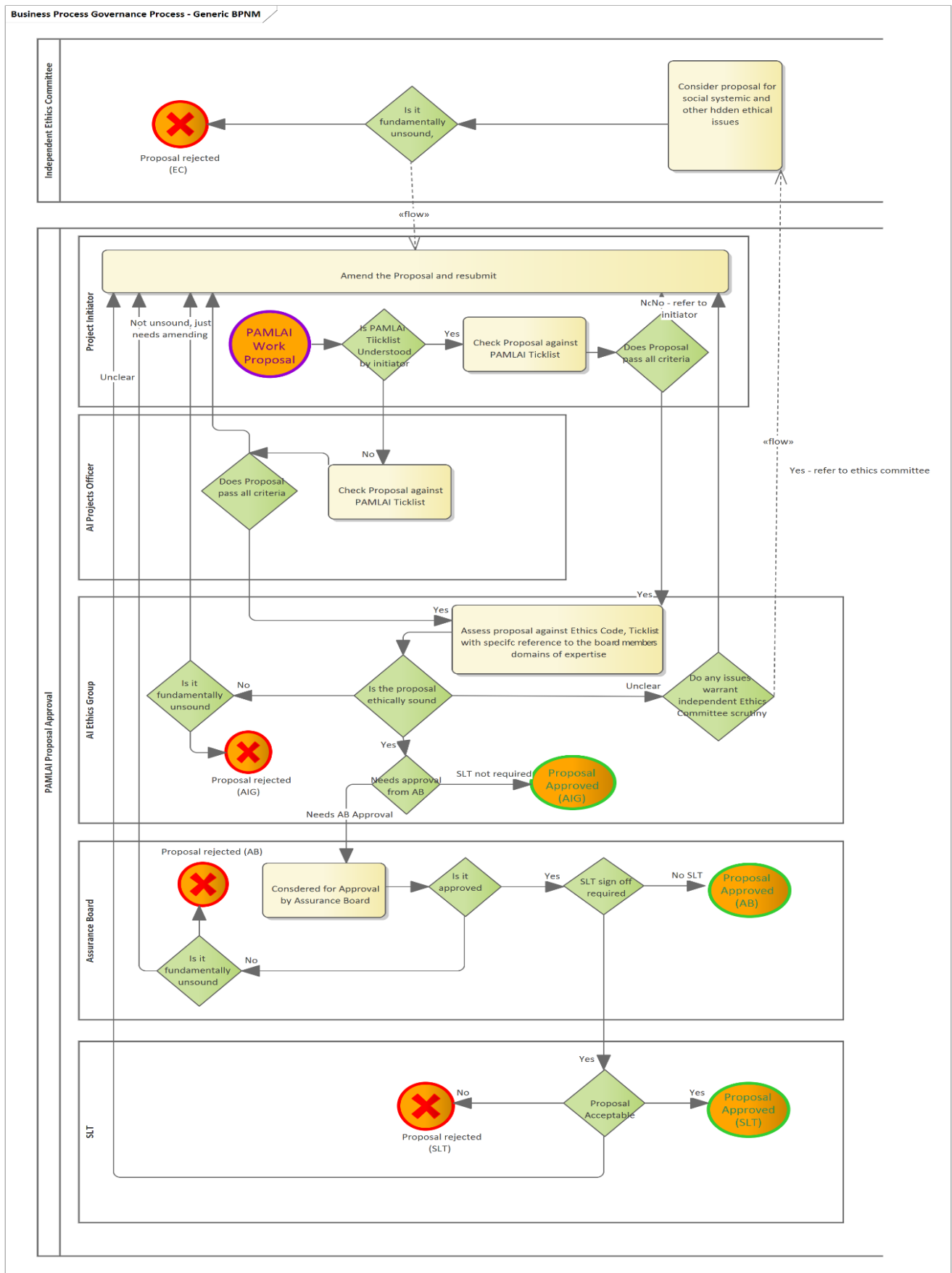


7.2 Appendix B - Authorisation Matrix

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					
		and not shared beyond author					
		or Procedural assistance required		A			
		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