HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

Response Date:16/11/2026

2026/1163 - Project Efa AI Simulation and Inclusive Leadership

In response to your recent request for information regarding;

Thank you for your substantive response dated 29 October 2026 concerning behavioural-science research, trials and interventions involving police officers.

I particularly note the disclosure of two North Wales Police initiatives:

1. Project Efa, commencing in October 2026, involving Actr-AI and Anglia Ruskin University.
2. Inclusive Leadership, operating during 2023–2024 and based on academic models from Durham University Business School.

I would like to submit a new, narrowly focused Freedom of Information request concerning these two named programmes only.

Please register this as a new request and allocate a separate reference number.

Part A — Project Efa

Your response describes Project Efa as an AI-based simulation involving interviews with a virtual stalking victim. Officers receive personalised feedback generated by the AI system, while Anglia Ruskin University is expected to analyse interviews to identify strengths, gaps, themes and risks.

For the period 1 January 2025 to 29 October 2026, please provide the following existing recorded information.

1. Project objectives and arrangements

Please provide the approved project brief, implementation plan, research proposal or equivalent document identifying:

a. The principal objectives of Project Efa.
b. The intended improvements in officers' interviewing skills or responses to stalking.

Project Efa will explore the value of staff interviewing a Gen-AI representation of a real-world stalking victim to improve operational practice. Interviews will automatically be assessed against best-practice standards, resulting in personalised staff feedback and aggregated insights into the organisational response to VAWG offences and how that response can improve.

c. The anticipated number and categories of officers participating.
All front line patrol officers

d. The planned duration and evaluation milestones.
Training to be completed by April 2027

e. The respective responsibilities of North Wales Police, Actr-AI and Anglia Ruskin University.
ACTR-AI are the technology delivery partner and ARU are evaluating the application of this technology in the context of policing

2. Research and evaluation methodology
No information held

Please provide the approved research protocol, evaluation framework or equivalent document identifying:

a. How officer interview performance will be assessed.
A best practice framework governed by established policy and subject matter expertise

b. The criteria used to identify strengths, weaknesses, gaps or risks.
A best practice framework governed by established policy and subject matter expertise

c. Whether participants undertake baseline and subsequent assessments.
A best practice framework governed by established policy and subject matter expertise

d. Whether different training methods or participant groups are compared.
A best practice framework governed by established policy and subject matter expertise

In relation to a-d above, harm has been identified in providing you with details relating to underlying methodology and system logic due to commercial sensitivity.

The exemption, as well as the factors considered when deciding where the public interest lies, are listed below:

Section 43 (2) Commercial Interests

This is a class-based exemption which means that the public authority must demonstrate that it is satisfied that to release the information would damage someone's commercial interests. It is also a qualified exemption which means that the public authority must consider the balance of the public interest in releasing the information against the public interest in withholding it.

Section 43 considerations

The questions requested would disclose methodology and system logic which is a fundamental element of the system proprietary information.

Public Interest Test

<u>Factors Favouring Disclosure</u>
There is a strong public interest in ensuring that public money is spent correctly and that North Wales Police, and therefore the tax payer, gets value for money when purchasing goods and services.

Release would also facilitate the accountability and transparency of North Wales Police for decisions taken by them in relation to contracts awarded so that they might be challenged.

Factors Favouring Non - Disclosure

Any response to these questions would provide visibility (partial or whole) of the systems methodology and logic into the public domain. Disclosure of this information would be seriously prejudicial to their commercial interests. Details of the product, even at a high level provides information into the marketplace which could be used by competitors.

Balancing Test

There are factors which in general terms favour release of this information, however, the factors favouring non-disclosure are more specifically relevant.

Releasing information which can be used by competitors and have a detrimental effect on a company would not be in the spirit of the Act. We cannot disclose information which would put companies at risk or create security issues or them or us.

My decision, therefore, is not to release this information.

Therefore, in accordance with the Freedom of Information Act 2000, this letter acts as a Refusal Notice under section 17 (1) of the legislation.

e. Whether random allocation is used.
N/A. The ARU evaluation relates to the technology within this context

f. How the effectiveness of the training will be evaluated.
As above

I am not assuming that Project Efa is a randomised controlled trial. If it is not, confirmation of the actual evaluation design would be sufficient.
Evaluation is being commissioned by a private company, Its not a North Wales Police (NWP) product

3. AI system and personalised feedback

Please provide any existing project documentation describing:

a. The AI simulation's principal functions.
The AI's primary function is scenario-based simulation and competency-based interview assessment. Project documentation is commercially sensitive and therefore the public interest test above is also relevant to this question.

b. Whether officer interviews are recorded, transcribed or otherwise retained.
All data is owned and retained by North Wales Police.

c. Whether personalised feedback is generated automatically or reviewed by a human assessor.
Generated automatically

d. Whether individual feedback is accessible to supervisors, trainers or managers.
If necessary, yes

e. Whether the system's assessments are used solely for training or may also inform formal performance or capability processes.
For training

4. Participant information and safeguards
N/A

Please provide blank or standard copies of:

a. Participant information sheets. No information held

b. Briefing materials explaining the purpose of Project Efa. No information held

c. Documents explaining whether participation in the training and evaluation is mandatory or voluntary.
No information held

d. Privacy notices. No information held

e. Any completed data protection impact assessment. Attached

f. Research ethics approval or governance documentation, where held.
Been through internal governance.

I am not requesting individual participant information, completed interviews or personal data.

5. External organisations and information-sharing arrangements N/A

Please provide any existing agreement, memorandum of understanding, data-sharing agreement or relevant project document identifying:

a. The responsibilities of Actr-AI. As above

b. The responsibilities of Anglia Ruskin University. ACTR-AI has a contract with ARU, not North Wales Police

c. Which organisations receive officer interview recordings, transcripts, feedback or evaluation data. ACTR-AI and NWP

d. The stated purposes for which those records may be used. Training

e. Relevant retention and deletion arrangements. The data is the property of NWP and therefore subject to our data processing duties

Commercially sensitive or otherwise exempt information may be redacted where justified, with non-exempt information disclosed where reasonably separable.

Part B — Inclusive Leadership
Your response identifies an Inclusive Leadership programme delivered during 2023–2024, intended to raise awareness and change the attitudes and behaviours of first- and second-line leaders.
For the period **1 January 2023 to 31 December 2024**, please provide:
6. Programme design
The approved programme specification, course outline or learning objectives identifying:
a. The behaviours or attitudes the programme sought to influence.
The aim of the Inclusive Leadership Programme was to deliver a Programme of workshops equipping delegates with the knowledge and understanding to build inclusive teams.
b. The leadership models or academic frameworks used.
The Inclusive Leadership Workshop was a knowledge-sharing workshop. An evidence-based, learner-centric approach had been adopted to create an effective learning environment to improve policing supervisors' awareness of the importance of improving respect, dignity, equality, and inclusion within their teams and to provide them with the knowledge and depth of understanding on how this can be achieved.
c. The intended participants.

First- and second-line leaders (Police Officers and Police Staff) across NWP.

d. The number of officers or staff trained, if recorded in an existing programme summary.

26 workshops were delivered between January 2023 and July 2024. Below is a breakdown of workshop delegates:

Total number of Delegates:	339
Male / Female:	188 males / 151 females
Police Officers:	216 - 9 Chief Inspectors, 56 Inspectors, 132 Sergeants, 6 Constables, 3 PCSOs, 10 Specials.
Police Staff:	123

7. Training materials

As far as we are aware the IP of the training materials remain the property of Durham University Business School. Therefore, no copies of the final approved participant handbook, presentation materials, facilitator guidance or equivalent course documents will be made available from NWP. Please find below the course content.

DAY 1	DAY 2
• Scene Setting & Introductions • Evidence-Based Decision Making • Durham University Research Findings • Public Service Motivation • Leadership • Supportive Leadership • Leadership & Ethical Behaviour • Culture, Values & Beliefs	• Key Learning & Reflections • Values • Engagement • Model: CAR • Model: MSR • Supportive Leadership • High Performance Expectations & Leadership Styles • The Importance of Trust & Values for Leadership • Effective Leadership Behaviours

DAY 3	DAY 4
• Key Learning & Reflections • Clarifying the link between Wellbeing & Inclusive Leadership • The National & NWP Wellbeing Picture • Your influence – Expectations & Belonging • Your influence – Reactions, Role Modelling & Environment • Wellbeing Discussions • Your Influence on Wellbeing • Wellbeing & Welfare Support in NWP • Your Wellbeing as a Manager & Leader	• Key Learning & Reflections • Self-Identity & Behaviour • Fairness, Identity & Behaviour • Mistreatment, Incivility & Derogatory Behaviour • Leadership, Motivation & Improving Behaviour • CPIR – Double Loop Processing • Inclusion & Leadership • Reflections & Call to Action

8. Evaluation

Any existing evaluation report, feedback summary, impact assessment or document recording:

a. How the programme's effectiveness was assessed.

The programme's effectiveness was assessed in 3 ways:

Participants' Survey: Administered to workshop delegates at the completion of each 4-day workshop to help understand the immediate reaction and impact of the workshop, together with quality of the learning experience.

Independent Evaluation by Durham University: An independent evaluation via collaborative research conducted by NWP and Durham University was undertaken to evaluate the effectiveness of the learning of the workshop.

Participants' Follow-Up Survey: Undertaken to provide an understanding of the longer-term impact of the workshop on delegates and their staff members. The survey was sent to participants after 6 months following their attendance on a workshop.

b. Whether changes in participants' attitudes or behaviours were measured.
Changes in participants' attitudes or behaviour were measured via the Independent Evaluation and the Participants' Follow-Up Survey.
c. Any findings concerning the programme's effectiveness.
Participants' Survey: Feedback was consistently impressive with positive and constructive comments being provided by delegates. The feedback was used to assists with making improvements to the delivery of future workshops.
Independent Evaluation by Durham University: The evaluation supported the effectiveness of the workshops for the achievement of a positive change in supervisors' leadership skills and their confidence and commitment to deal with inappropriate behaviour within their work teams. The findings supported the validity of the underpinning theory, the design of content and delivery processes of the workshops.
Participants' Follow-Up Survey: In general, the responses were positive and suggested that most respondents had been able to transfer their learning from the workshop into the workplace. The responses also revealed that over 40% had observed positive differences in their teams' attitudes and behaviours towards performance, inclusion, and diversity.
d. Any decision to continue, amend or discontinue the programme.
The decision was made to discontinue the programme. The aims and content of the ILP were included in the design and delivery of FLLP and MLLP within NWP.
9. Durham University Business School
Please provide any existing record clarifying whether Durham University Business School or its researchers were directly involved in designing, delivering or evaluating the programme, or whether North Wales Police drew solely upon published academic models.
Durham University Business School were directly involved in the design and evaluation of the programme. NWP furthered developed the training material to ensure it met its local needs and then delivered the programme.

Scope and proportionality

This request concerns two named programmes already identified by North Wales Police.

I am not seeking a force-wide search, unrelated training programmes, individual officer records, completed interviews, raw research data or newly created analysis.

Final approved documents may be supplied instead of drafts. Publicly available documents may be identified by direct links.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 11/11/2026

DATA PROTECTION IMPACT ASSESSMENT Screening Form

This document provides information and guidance to help you complete the Data Protection Impact Assessment (DPIA) screening process (page 4 onwards), to determine whether a full DPIA is required.

You will also find further clarification and assistance where you see an '?' situated in the DPIA screening form below, and also examples where you see *(Hover for examples)*.

Please also refer to the ICO guidance when completing this form.

What is a DPIA?

Data protection and privacy must be at the forefront of the design of any new, or changes to, a system, proposal, project or plan.

A Data Protection Impact Assessment (DPIA) is a process designed to help organisations analyse, identify and mitigate data protection and privacy risks. DPIAs also consider broader risks to individuals and/or society. The focus is on the potential for harm (physical, material or non-material).

A DPIA does not have to eradicate the risks altogether, but should help to minimise risks and assess whether the remaining risks are justified.

DPIAs are a legal requirement for processing that is likely to result in a high risk. However, an effective DPIA can also bring broader compliance, financial and reputational benefits, helping organisations to demonstrate accountability.

What is the DPIA Process?

A DPIA should be considered early in the life of a project (when you know what you want to do and how) and crucially, before you start processing and committing any financial resources.

The DPIA process has two stages:

- **Stage 1: DPIA screening** - the DPIA screening will determine whether a DPIA will be required (i.e. processing is likely to result in a high risk). If you require advice or guidance, please contact the Data Protection Officer on dataprotectionenqs@nthwales.pnn.police.uk

- **Stage 2: DPIA** – This will document a full assessment of the risks and records decisions about the use of personal data.

When is a DPIA is required?

A DPIA will be required when the processing is likely to result in a 'high risk' to the 'rights and freedoms of individuals'.

The Information Commissioner's Office (ICO) have published guidance outlining a number of factors which are likely to present a 'high risk' when processing personal data. These factors are outlined in Section 3 of the Screening Form.

When considering an individual's rights and freedoms, although the primary concern relates to the right to privacy, it may also involve other fundamental rights or lead to physical, material or non-material damage, for example:

- discrimination, identity theft or fraud, financial loss or reputational damage;
- where the vulnerable, children or special categories of data are processed;
- where personal aspects are evaluated in order to profile individuals (e.g. performance at work, health, reliability or behaviour, location or movements);
- where an individual is prevented from exercising control over their data; or
- where the processing involves a large amount of personal data or affects a large number of data subjects.

The DPIA screening will determine whether a DPIA is required.

Who should complete the DPIA Screening and the DPIA?

The head of department/Information Asset Owner (IAO) commissioning the proposal is responsible for ensuring the screening takes place and for ongoing review of a DPIA to ensure that the document is kept current and relevant, ensuring changes to how data is managed are captured. Undertaking of the Screening and DPIA can be delegated to a **designated business lead** or **project manager.**

The Data Protection Officer (DPO) is required within their statutory duties to monitor and advise IAOs on DPIA compliance.
The DPO will review fully completed DPIA Screenings to ensure that the process has been correctly followed and the risks identified.
The DPO will:-

- provide an initial assessment on the fully completed DPIA Screening form;
- provide advice where the project needs to do further work to adequately complete the document and deliver data protection by design and default; and
- provide a final assessment to any revised DPIA Screening as to whether a full DPIA is required.

How should I complete the DPIA screening?

Complete the fields required on the DPIA screening form, avoid technical jargon and acronyms, and ensure you explain the proposal in a way that someone with no prior knowledge could easily understand.

After review by the head of department/Information Asset Owner, submit completed forms to the Data Protection Officer (DPO) via email to dataprotectionenqs@nthwales.pnn.police.uk . Failure to provide sufficient information will delay the Data Protection Officer's assessment and response.

DPIA SCREENING	
Step 1 - GOVERNANCE	
Project Proposal Name:	Project Efa
Head of Department/Information Asset Owner[?]:	…
Designated Business Lead/Project Manager:	Project Resource not yet assigned.
Date on which system/initiative expected to commence:	01/04/2026
Date sent to Head of Department/Information Asset Owner for assessment	DD/MM/YYYY
Date assessment completed by Head of Department/Information Asset Owner	16/10/2025
Date sent to DPO	16/10/2025
Step 2 – OVERVIEW	
2.1 Aim and Purpose: Avoiding technical language and acronyms please provide a brief overview of aim and purpose of the process or proposal, focusing on where personal data will be processed. It may be useful to refer to project documentation and diagrams.	
Project Efa will explore the value of staff interviewing a Gen-AI representation of a real-world stalking victim to improve operational practice. Interviews will automatically be assessed against best-practice standards, resulting in personalised staff feedback and aggregated insights into the organisational response to stalking and how that response can improve. **The innovation of the project consists of using a self-hosted Large Language Model supported by Retrieval-Augmented Generation (RAG) to:** **1. Portray a victim of stalking informed by the personality, characteristics and**	

lived experience of Rhiannon Bragg, a high profile victim-survivor of stalking in North Wales. The AI representation will communicate with users through a text and speech interface and respond naturally to rapport-building and investigative techniques. It will embody a real victim's lived experience and 'voice' for interaction at scale.

2. Assess a large number of resulting interview transcripts against a repository of best practice, including College of Policing Authorised Professional Practice, input from Subject Matter Experts (including victim-survivors) and specific assessment criteria aligned to force policy and procedure to generate thematic insight. Themes will include:
- How do our officers/staff engage and build rapport with victims?
- How effective is their initial investigation and risk assessment?
- How effectively do they reassure victims and signpost them to support services?

3. Provide personalised, objective and consistent feedback directly to a large number of our officers in order to improve their practice, while testing whether AI-enabled assessment for empathy and interviewing standards is an effective means of formative assessment.

4. Support a feasibility study into using Gen-AI roleplay, and the methodological insights and data it is anticipated to generate, as a means of advancing policing knowledge through operational evaluation and audit.

2.2 Explain whether it involves the collection of new information about individuals

☒ Yes ☐ No - already collect ☐ No information about individuals involved

The process will be utilising real accounts from a stalking survivor to educate staff within North Wales Police. This information is held and owned by the private company that delivers the AI based training. The data collected and processed from a NWP perspective would be the dialogue between the AI and the officer undertaking the training. This will be held within the AI environment.

2.3 Explain if it will involve multiple processes
E.g. if it was a HR system it could have multiple processes such as:- Recruitment, Payroll & Pensions, Employee Relations, and Learning & Development all within one system.

☐ Yes ☒ No

Click here to enter text.

2.4 Explain whether a DPIA has been completed previously? (by NWP or another similar organisation).

In the text box, outline whether a DPIA (or PIA) has been completed previously or not. If already a current process, outline whether the nature, scope, context or purpose of the current processing has changed.

☐ Yes ☒ No

Click here to enter text.

Step 3 – PERSONAL DATA USE

3.1 What types of personal data about living individuals will be used?
(select all that apply and provide further detail in the free-text box if required)

☐ None (no personal data)	☐ Suspects	☐ Racial / ethnic origin
☐ Names	☐ Convicted people	☐ Religion
☐ Dates of birth	☐ Victims of a criminal offence	☐ Political opinions
☐ Addresses	☐ Witnesses of offences	☐ Philosophical beliefs
☐ Unique identifiers	☐ Children	☐ Sex Life
☐ Contact numbers	☐ Vulnerable individuals	☐ Sexual orientation
☐ Email addresses	☐ Organisation's staff	☐ Health data
☐ Sound/visual images	☐ Complaint records	☐ DNA samples/profiles
☐ Facial recognition	☐ Criminal records	☐ Blood samples
☒ Lifestyle/Social circumstances	☐ Employment records	☐ Fingerprint data/profiles

The training utilises the lived experience of a stalking survivor within the North Wales Area. They have provided details of their experience with a private company who have developed this training package..

3.2 How will the data be collected?
Briefly outline how you will obtain the data, examples include: directly from individuals, from another data set already in our possession, from a partner agency.

Data already exists within the training package. No new data other than staff/officer responses will be collected by NWP.

3.3 How many people will be affected (yearly basis)? (Select one answer below)

☒ Fewer than 100 data subjects
☐ 100 to 1000 data subjects
☐ 1000 to 5000 data subjects
☐ More than 5000 data subjects

Click here to enter text.

3.4 Will personal data be shared with anyone (select all that apply)

☐ Partners / other agencies
☐ Internal – other departments
☐ Service provider / processor
☐ Shared inside of UK (check Cloud storage)

☐ Shared outside of UK but within EU ☐ Shared with country outside of the EU
3.5 Explain the review, retention and disposal process All records must have a retention period set by the owner of the information when first created or received.
RRD aligned to NSWG guidelines. Subject of annual inspection by IPCO. NWP only hold data that they are legally obliged to hold. All material where retention cannot be justified has been deleted. Regular reviews of data are in place.

Step 4 – SCREENING QUESTIONS

The below are a number of factors that are likely to present a 'high risk' to individuals when processing personal data.
Saying **'yes'** to one or more of the following will indicate that a DPIA is required.

	Does the processing involve:	**'Yes' or 'No'**	**If 'Yes' then please provide further details**
1.	**Systematic? and extensive? evaluation based on automated decision-making? or profiling?, resulting in legal/other significant? effects** *(Hover for examples)*	☐ Yes ☒ No	Click here to enter text.
2.	**Data Processed on a large scale?, and in particular relating to special category data?, criminal data, or of a highly personal nature** *(Hover for examples)*	☐ Yes ☒ No	
3.	**Systematic? monitoring of a publically available area on a large scale?** *(Hover for examples)*	☐ Yes ☒ No	Click here to enter text.
4.	**New technologies? or novel application of existing technologies** *(Hover for examples)*	☒ Yes ☐ No	Unsure if the technology is new as generative AI has been used across policing. It may be that this is one of the first times it has been used to deliver training within policing.
5.	**Denial of service?** *(Hover for examples)*	☐ Yes ☒ No	Click here to enter text.
6.	**Any processing of biometric? or genetic? data** *(Hover for examples)*	☐ Yes ☒ No	Click here to enter text.
7.	**Data matching?:** *(Hover for examples)*	☐ Yes ☒ No	Click here to enter text.
8.	**Invisible processing?** *(Hover for examples)*	☐ Yes ☒ No	Click here to enter text.
9.	**Tracking?**	☐ Yes	Click here to enter text.

	(Hover for examples)	☒ No	
10.	**Targeting of children or vulnerable individuals for marketing, profiling, automated decision-making or the offer of online services.** *(Hover for examples)*	☐ Yes ☒ No	Click here to enter text.
11.	**Risk of physical harm**[?] *(Hover for examples)*	☐ Yes ☒ No	
12.	**Evaluation or scoring**[?]	☐ Yes ☒ No	Whilst the training will provide feedback it is from a learning and development perspective not a performance one.
13.	**Processing which prevents individuals from exercising their rights or using a service or contract** *(Hover for examples)*	☐ Yes ☒ No	Click here to enter text.

Please complete the Governance Section (Step 1), and the initial assessment by the Head of Department/Information Asset Owner in Step 4, prior to sending to the DPO using the following mailbox:-
dataprotectionenqs@nthwales.pnn.police.uk

Step 4 – IAO ASSESSMENT	
In most cases, only one of these factors indicates the need for a DPIA. However, this is not a strict rule. You may be able to justify a decision not to carry out a DPIA if you are confident that the processing is unlikely to result in a high risk, but you should document your reasons.	
Assessment of IAO (include your rationale for completing/not completing a full DPIA	Based on the above screening I will take guidance from the DPO as only the use of AI seems to suggest that a DPIA will be required.
Assessment completed by:	Name: … Date: 16/10/2025

Step 5 – DPO Review
The DPO will conduct a review of the information provided, and will offer advice on any further work needed on this screening document, and whether a full DPIA is required.

A. A DPIA is not required.	☐	Click here to document rationale.
B. A DPIA is not required as long as the following remedial action listed is carried out. If the remedial action is not carried out, a DPIA will be required.	☐	Click here to document rationale.
C. A DPIA is required.	☐	Click here to document rationale.
Assessment completed by:	Name:	Date: