HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

Response Date:16/11/2026

2026/1186 - AI Force Usage

In response to your recent request for information regarding;

1. For the AI avatar training tool for victim interviewing, the DPIA attached to your response is a screening form dated 16/10/2025 with the Data Protection Officer's review section blank. Please provide any full DPIA completed for this tool, and the Data Protection Officer's recorded outcome on the screening form. If no full DPIA was completed, please confirm that in writing.

There is no full DPIA, it just has a screening form at present.

2. The Equality Impact Assessment and the Welsh Language Impact Assessment referred to at paragraph 6.6 of AI Usage Policy 037 v1.1, and any Equality Impact Assessment completed for the AI avatar training tool or for the Pimloc Secure Redact trial. If none was completed for a tool, please confirm that in writing. I note your response suggested I contact the Diversity team. I am asking you to supply what the force holds, as I understand that it is the force's duty to do so.

Please find attached the Equality Impact Assessment and the Welsh Language Impact Assessment.

3. Whether the outputs of the AI avatar training tool (the assessment of an officer's interview or feedback to an individual) are recorded against the individual officer or staff member, or are used in any performance or development review. Please also say how long those outputs are retained.

No, the feedback isn’t recorded against individual officers or used in performance reviews.

4. The terms of reference, or equivalent governance document, for the Artificial Intelligence Governance Board, and the date it was stood down.

The AI Usage policy current policy has not been stood down by the Assurance Board, it remains in effect until the new version replaces it. It has however, been proposed that the AIG be subsumed into the Information and Cyber Security Board.

5. The content or outline of the training given to the Senior Management Teams on the risks of AI, and the date it was delivered.

SMT Training: Over the course of a year or more talk was given at every SMT meeting.

Overview of topics in Ai Risk talk for SMT:
Overview
The dilemma

Capabilities – What can Ai do
Ai /ML / LLM
Major risks
- "Computer says syndrome"
- Deskilling
- Ai enhanced mailicious attacje
- Soft ransomware targets
- Escalating political tension
- Misaligned organisational talent
- AI-assisted misinformation

Risk Examples
- Minority Report – Durham HART model
  - Bias
- New York lawyer
  - Fake precedent cited in court
- ChatGPT banned in Italy
  - Dataleaks
- Bing accuses court reporter of crimes on which he reported
  - LLM is not search
- Facial recognition
  - A week improperly imprisoned
  - 25 Million paid to deep fake video
- Chatbots

Chatbots promise incorrect prices
- Ai being inserted into or adjusted in products without us knowing

EU Ai Act and other regulations
Security breaches
Potential Dangers
Risk registers
Mitigating Risk
Ai policy
Ai Usage Policy
Takeaways
- Register use of Ai
- Send NO data to LLMs

Discusssion

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

College of Policing

Equality Impact Analysis Toolkit

	Name of Policy/Project, Practice or Procedure under development (hereafter called 'product')	Predictive Analytics, Machine Learning, Artificial Intelligence (PAMLAI) Policy.
?	**Brief description of the planned product**	The purpose of the PAMLAI Policy is to ensure there is a legal basis and an ethical framework for the use of Predictive Analytics / Machine Learning / Artificial Intelligence.
?	**Equality Impact Analysis Author / Lead**	…
?	**Date Started**	08.03.23
?	**Equality Impact Analysis Author / Lead Sign Off Date**	
?	**Equality Lead**	….
?	**Equality Lead Sign Off Date**	

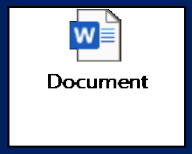
The Equality Analysis should address all the points outlined above and be a living document that outlines the way equality has been considered throughout the lifetime of the project. Key dates and decisions associated with equality should be noted. The document will then form a rich source of promotion to demonstrate how you have explicitly shaped your product to suit all individuals it will impact on. This could take the form of showing how the three parts of the Public Sector Equality Duty have been met:

1. Eliminate discrimination, harassment, victimisation and any other conduct prohibited by or under the Act.

2. Advance equality of opportunity between persons who share a protected characteristic and those who do not share it.

3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Double click here for guidance on completing this template



Click here for information about the Public Sector Equality Duty
Click here for information about the Equality Act 2010

?

Identify points in the project at which the Equality Analysis will be reviewed

Key Stage	Review Date
PAMLAI Ethics Code	
PAMLAI - Checklist document	

?

Planned sources of information and summary of what the data / evidence is suggesting

Protected Characteristics in Policing Systems and The Workforce Recording Data Standard - Equality Impact Assessment

There is no express requirement under the public sector equality duty to collect monitoring information. However, in order to meet the duty, public bodies need to understand the impact of their work, and collecting monitoring information is likely to be an effective way of gathering sufficient information to enable them to do this.

Whenever people share their diversity data we are processing their personal information. Often the information we process will also be sensitive, such as information about disabilities. We need a clear legal basis for processing diversity information before we can collect and use it.

Discrimination in the use of artificial intelligence
https://library.college.police.uk/docs/college-of-policing/Brief-Sept-Oct-2022.pdf?

EHRC Guidance - Artificial intelligence in public services
https://equalityhumanrights.com/en/advice-and-guidance/artificial-intelligence-public-services

This guide provides an overview of what artificial intelligence is, guidance on how the Public Sector Equality Duty applies when a public body uses artificial intelligence, a checklist for public bodies in England (and non-devolved and cross-border public bodies). It does not cover how inappropriate use of AI may lead to breaches of other laws, such as the Data Protection Act 2018 and the Human Rights Act 1998.

AI systems may lead to discrimination and deepen inequalities. Discrimination may happen because the data used to help the AI

make decisions already contains bias. Bias may also occur as the system is developed and programmed to use data and make decisions. This process is often referred to as 'training' the AI. The bias may result from the decisions made by the people training the AI. Sometimes the bias may develop and accumulate over time as the system is used.

Artificial intelligence: meeting the Public Sector Equality Duty (PSED)
https://equalityhumanrights.com/en/advice-and-guidance/artificial-intelligence-meeting-public-sector-equality-duty-psed

Public bodies need to consider the PSED from the very start when thinking about whether to use AI. The PSED also applies to any AI systems that public bodies are already using or that others may be developing or using on their behalf.

Artificial intelligence: checklist for public bodies in England (and non-devolved bodies)
https://equalityhumanrights.com/en/advice-and-guidance/artificial-intelligence-checklist-public-bodies-england

The PSED is an 'ongoing duty'. This means you need to make sure AI is working as intended and guard against any unlawful discrimination or unintended negative effects that you might not have anticipated. As a minimum, this is likely to include regular monitoring and evaluation to see whether people with one or more protected characteristic are being treated more or less well than other people. Sometimes this may be difficult.

Review into Bias in Algorithmic Decision-Making
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938857/Summary_Slide_Deck_-_CDEI_review_into_bias_in_algorithmic_decision-making.pdf

Organisations should carry out Equality Impact Assessments to understand how their models perform for candidates with different protected characteristics,including intersectional analysis for those with multiple protected characteristics.

Algorithmic bias means that the overlap between discrimination law, data protection law and sector regulations is increasingly important, especially given 1) the use of protected characteristics (PCs) data to measure and mitigate algorithmic bias; 2) the lawful use of bias mitigation techniques; 3) identifying new forms of bias beyond existing PCs; and 4) for sector-specific measures of algorithmic fairness beyond discrimination.

The public sector equality duty and data protection
https://www.equalityhumanrights.com/sites/default/files/the-public-sector-equality-duty-and-data-protection.docx

Office for Artificial Intelligence
https://www.gov.uk/government/organisations/office-for-artificial-intelligence

Ethics, Transparency and Accountability Framework for Automated Decision-Making
https://www.gov.uk/government/publications/ethics-transparency-and-accountability-framework-for-automated-decision-making

?

Other Information and context that will be considered

The existing PAMLAI Ethics Code, the checklist document and additional information (including the above) will inform the Force Policy. The following EIA is an assessment of the Force Policy only.

There is no express requirement under the public sector equality duty to collect monitoring information. However, in order to meet the duty, public bodies need to understand the impact of their work, and collecting monitoring information is likely to be an effective way of gathering sufficient information to enable them to do this. We need a clear legal basis for processing diversity information before we can collect and use it.

Biased algorithms, poor data collection and a lack of diversity in research and development can all contribute to disproportionate outcomes for underrepresented and marginalised groups.

?

Impact and agreed actions related to each 'Protected Characteristic'

1. AGE

?

The policy seeks to prevent disparity in the treatment of people by age by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

2. DISABILITY

?

The policy seeks to prevent disparity in the treatment of people by level of disability by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

3. GENDER REASSIGNMENT

?

The policy seeks to prevent disparity in the treatment of people who have undergone or are seeking gender reassignment by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

4. MARRIAGE AND CIVIL PARTNERSHIP

?

The policy seeks to prevent disparity in the treatment of people by marital or civil partnership status by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

5. PREGNANCY & MATERNITY

?

The policy seeks to prevent disparity in the treatment of people who are pregnant or have infants by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

6. RACE

?

The policy seeks to prevent disparity in the treatment of people of different races by helping to ensure that all future PAMLAI work avoids bias (either inherent in a pruchased product or service, in the data or as a result of processing) - each project or proposal that uses the policy will be required to complete an EIA as they will all differ in method, aim, scope and risk.

7. RELIGION OR BELIEF

?

The policy seeks to prevent disparity in the treatment of people by religion or belief by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

8. SEX

?

The policy seeks to prevent disparity in the treatment of people by sex by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

9. SEXUAL ORIENTATION

?

None directly, but this policy seeks to prevent potential disparity by sexual orientation by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

SOCIO-ECONOMIC FACTORS

?

The policy seeks to prevent disparity in the treatment of people from different socio-economic background by helping to ensure that all future PAMLAI work avoids bias (either inherent in the data or resulting from the processing) - each project or proposal that uses the policy will be reuired to complete an EIA as they will all differ in aim, scope and risk.

WELSH LANGUAGE

?

Welsh Language Impact Assessment has been undertaken.

Secondary Impacts to consider. Intersecting, etc.

Secondary Impacts: Is there an opportunity for/risk of secondary impacts (for example a new process relating to part-time working will be more relevant to women)? These can be potentially negative or positive impacts. What about the combination of different, intersecting, protected characteristics?

?

Key dates when equality was considered and actions reviewed or evaluated

Consideration - 1

Initial DRAFT EIA presented to the Policv Author

Review Dates

Owner(s)

Related Action

Policy Author to assess the initial DRAFT EIA consider mitigating any potential impact.

Action Review and Evaluation Outcome. What's next?

Consider the Policy, amend as necessary and reassess the EIA.

Consideration - 2

Included for general consultation

Review Dates

30 July 2023

Owner(s)

Related Action

Consider feedback

Action Review and Evaluation Outcome. What's next?

Include in submission to assurance board

Consideration - 3

Submit to Assurance board with PAMLAi policy for final ratification

Review Dates

02 August 2023

Owner(s)

Related Action

Action Review and Evaluation Outcome. What's next?

Consideration - 4

Review Dates

Owner(s)

Related Action

Action Review and Evaluation Outcome. What's next?

Consideration - 5

Review Dates

Owner(s)

Related Action

Action Review and Evaluation Outcome. What's next?

Consideration - 6

Review Dates

Owner(s)

Related Action

Action Review and Evaluation Outcome. What's next?

Consideration - 7

Review Dates

Owner(s)

Related Action

Action Review and Evaluation Outcome. What's next?

Consideration - 8

Review Dates

Owner(s)

Related Action

Action Review and Evaluation Outcome. What's next?

Welsh Language Impact Assessment Toolkit

	Name of Policy/Framework/Practice Guide/Standard Operating Procedure under development (hereafter called 'policy')	PAMLAI Ethics Policy
?	**What are the main aims of the 'policy'?**	The policy aims to ensure that PAMLAI (predictive analytics, machine learning, artificial technologies) are only used in an ethical manner
?	**Welsh Language Impact Assessment Author**	…
?	**Date Started**	003/03/2023
?	**Welsh Language Impact Assessment Author Sign Off Date**	
?	**Welsh Language Impact Assessment Lead**	
?	**Welsh Language Impact Assessment Lead Sign Off Date**	

The Welsh Langauge Impact Assessment should address all the points outlined above and be a living document that outlines the way welsh language has been considered throughout the creation of the policy. The document will form a rich source of promotion to demonstrate how you have explicitly shaped your policy to suit all individuals it will impact on. This could take the form of showing how the Welsh Language Standards requirements (below) have been met:

Welsh Language Standard 85 - When you formuluate a new policy, or review or revise an existing policy, you must consider what effect, if any (whether positive or adverse), the policy decision would have on
a) Opportunities for persons to use the Welsh language, and
b) treating the Welsh Language no less favourably than the English Language

Welsh Language Standard 86 - When you formulate a new policy, or review or revise an existing policy, you must consider how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would have positive effects, or increased positive effects, on
a) opportunities for persons to use the Welsh Language and
b) treating the Welsh Language no less favourably than the English Language

Welsh Language Standard 87 - When you formulate a new policy, or review or revise an existing policy, you must consider how the policy could be formulated (or how an existing policy could be changed) so that the policy decision would not have adverse effects, or so that it would have decreased adverse effects, on -
a) opportunities for persons to use the Welsh Language, and
b) treating the Welsh Language no less favourably than the English Lanugage

Welsh Language Standard 88 - When you publish a consultation document which relates to a policy decision, the document must consider, and seek views on, the effects (whether positive or adverse) that the policy decision under consideration would have on -
a) opportunities for persons to use the Welsh Language, and
b) treating the Welsh language no less favourably than the English language

Welsh Language Standard 89 - When you publish a consultation document which relates to a policy decision the document must consider, and seek views on, how the policy under consideration could be forumlated or revised so that it would have positive effects, or increased positive effects, on -

a) opportunities for persons to use the Welsh Language, and

b) treating the Welsh Language no less favourably than the English Language

Welsh Language Standard 90 - When you publish a consultation document which relates to a policy decision the document must consider, and seek views on, how the policy under consideration could be forumlated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects on -

a) opportunities for persons to use the Welsh Language, and

b) treating the Welsh Language no less favourablt than the English Language

Welsh Language Standard 92 - When you commission or undertake research that is intended to assist you to make a policy decision, you must ensure that the research considers what effects, if any (and whether positive or adverse), the policy decision under consideration would have on —

(a) opportunities for persons to use the Welsh language, and

(b) treating the Welsh language no less favourably than the English language.

Welsh Language Standard 93 – When you commission or undertake research that is intended to assist you to make a policy decision, you must ensure that the research considers how the policy decision under consideration could be made so that it would have a positive effects, or so that it would have increased positive effects, on —

(a) opportunities for persons to use the Welsh language, and

(b) treating the Welsh language no less favourably than the English language.

Welsh Language Standard 94 – When you commission or undertake research that is intended to assist you to make a policy decision, you must ensure that the research considers how the policy decision under consideration could be made so that it would not have adverse effects, or so that it would have decreased adverse effects, on —

(a) opportunities for persons to use the Welsh language, and

(b) treating the Welsh language no less favourably than the English language.

Welsh Language Standard 95 – You must develop a policy on using Welsh internally for the purpose of promoting and facilitating the use of the language, and you must publish that policy on your intranet.

Welsh Language Standard 102 – If you publish a policy relating to behaviour in the workplace, you must publish it in Welsh.

Welsh Language Standard 103 – If you publish a policy relating to health and well-being at work, you must publish it in Welsh.

Welsh Language Standard 104 – If you publish a policy relating to salaries or workplace benefits, you must publish it in Welsh.

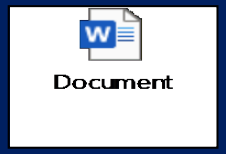
Welsh Language Standard 105 – If you publish a policy relating to performance management, you must publish it in Welsh.

Welsh Language Standard 106 – If you publish a policy about absence from work, you must publish it in Welsh.

Welsh Language Standard 107 – If you publish a policy relating to working conditions, you must publish it in Welsh.

Welsh Language Standard 108 – If you publish a policy regarding work patterns, you must publish it in Welsh

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Click here for information about the Welsh Language Standards
Click here for information about the Welsh Language Commissioner
Click here for information about the Joint OPCC / NWP Welsh Language Strategy

? **Identify points in the policy creation/review at which the Welsh Language Impact Assessment will be reviewed**

Key Stage	Review Date
Draft	
Final	

? **Planned sources of information and summary of what the data / evidence is suggesting**

Consultation with Head of Welsh Language
Consultation with Welsh Language Champion
Review of Welsh language Impact assmessment guidelines
Review of several bodies work on bias (see policy for full list)

?

Other Information and context that will be considered

Impact and agreed actions related to the Welsh Language Standards Relating to Policy Creation / Review

?

1. What are the aims of the policy, and how do these relate to the Force Welsh language Strategy and the Welsh Language Standards?

?

The aim of the policy is to prevent inherent or added biases in the use, creation, and purchase of PAMLAI technologies

2. Does the policy further promote, encourage and support the use of Welsh and language choice by the Force? Could it do more to enhance this?

?

The policy supports the use of Welsh and will require a Welsh Language impact assessment for each proposal that uses the policy

3. What aspects of the policy are particularly relevant to the Force Welsh Language Strategy?

?

The need to check data, and algorithms to ensure that no bias is inherent in he data or created by the model or processing

4. Which of the Welsh Language Standards apply?

?

Welsh Language standard 85, 86, 87, 95. The policy deals with the data and machine behaviour and that of people implementing or purchasing the PAMLAI technology this might be seen as 102

5. Could the policy affect Welsh Language groups? Which Welsh Language groups are relevant to this policy?

?

No, the forms used in the policy will be avaiable through English or Welsh as will guidance. Specific pieces proposals for pieces of work might have an effect, but each will need to complete a separate WLIA

6. Is it a policy that could affect service users or how services or functions are performed? Could it improve the provision of language choice?

?

As a result of this impact assemessment, additional forms have been create in both languages and a guaranteed offer of guidance in Welsh has been added to the policy body

7. Will it have an impact on how other bodies operate with regard to the Welsh Language (for example, language choice provision to the public and staff)?

?

Other bodies wishing to collaborate with NWP on a PAMLAI project will be able to do so through the medium of Welsh

8. Does it relate to functions that previous engagement exercises have identified as important to Welsh speakers?

?

No, although there is research underway to ascertain rural attitudes toward police use of PAMLAI and there has been a higher proportion of Welsh speakers in rural areas

9. Will the proposed action(s) affect any or all of the following? If so, to what extent?

Traditional Welsh speaking communities in north Wales
Promoting and facilitating opportunities for service users (public and staff) to be able to use Welsh when receiving services or information from NWP
Promoting bilingual workplaces and encouraging and supporting more use of Welsh at work
Fluency and confidence of Welsh speakers and learners to use Welsh
The provision of language choice in Welsh and English by other organisations or agencies
Use of Welsh by the public when contacting NWP
Numbers and / or percentages of Welsh speaking staff or applicants for posts in NWP
Fluency and confidence of Welsh speakers and learners to use Welsh
Use of Welsh in media / social media

?

The policy will only apply in a few cases but it should have a positive roll, albeit to a to a minimal extent.
For those using the policy, it should :
Promote and facilitate opportunities for service users (public and staff) to be able to use Welsh when receiving services or information from NWP about PAMLAI
Promote bilingual workplaces and encouraging and supporting more use of Welsh at work when discussing PAMLAI
Fluency and confidence of Welsh speakers and learners to use Welsh
The provision of language choice in Welsh and English by other organisations or agencies
The roles required for the policy already require level 3 Welsh or above, any new posts will have a similar or more stringent requirement

10. Could the policy / action result in non-compliance with the Welsh Language Standards?

?

No

11. Now that you have listed all the possible effects, who is likely to be affected, when and where?

Effects that are positive for some groups could be detrimental to others - even among Welsh language groups.

Consider the effects on different groups. For example, a proposal may be beneficial to Welsh learners, but not to Welsh speakers.

- Welsh speakers
- Welsh Learners
- Pupils and students in Welsh medium schools or colleges
- Welsh language service users

?

Welsh speakers and learners will have an additional outlets to speak Welsh when dealing with PAMLAI technology

Welsh Language Standard 102 – If you publish a policy relating to behaviour in the workplace, you must publish it in Welsh.

?

The policy will be published in Welsh

Welsh Language Standard 103 – If you publish a policy relating to health and well-being at work, you must publish it in Welsh.

?

n/a

Welsh Language Standard 104 – If you publish a policy relating to salaries or workplace benefits, you must publish it in Welsh.

?

n/a

Welsh Language Standard 105 – If you publish a policy relating to performance management, you must publish it in Welsh.

?

n/a

Welsh Language Standard 106 – If you publish a policy about absence from work, you must publish it in Welsh.

?

n/a

Welsh Language Standard 107 – If you publish a policy relating to working conditions, you must publish it in Welsh.

?

n/a

Welsh Language Standard 108 – If you publish a policy regarding work patterns, you must publish it in Welsh

?

n/a

Key dates when the Welsh Language Standards were considered and actions reviewed or evaluated

Consideration - 1

The need for additional forms in the welsh language

Review Dates

Owner(s)

Related Action

The forms will be added in Welsh

Action Review and Evaluation Outcome. What's next?

Check with Welsh language services that the welsh used is standards compliant or at least grammatically accurate

Consideration - 2

The need for guidance to be made available through the medium of Welsh

Review Dates

Owner(s)

Related Action

Add guarantee to policy that guidance may be sought in either English and Welsh

Action Review and Evaluation Outcome. What's next?

Consideration - 3

the need for the PAMLAI officer to be able to communicate through the medium of Wels

Review Dates

Owner(s)

Related Action

Add requirement to the policy

Action Review and Evaluation Outcome. What's next?

Consideration - 4

Review Dates

Owner(s)

Related Action

Action Review and Evaluation Outcome. What's next?