



Data ethics case study - the Metropolitan Police Service

Summary

The Metropolitan Police Service's ambition is to develop a data ethics framework that is embedded in the organisational culture, and supports its work to build public trust and confidence through transparency in its decision making.

To make this work, the MPS is:

- Establishing a governance model to align with existing reporting arrangements
- Creating a data ethics impact assessment that fits with existing privacy and equalities models
- Looking at how it can contribute to and support data literacy across all work groups
- Mirroring existing MPS models of community involvement to ensure citizen input

Origins

The Metropolitan Police Service (MPS) is the largest force in the UK with more than 43,000 serving police officers. The MPS established a Data Office in early 2020, led by Aimee Reed who is the Director of Data. As part of the Data Office, the MPS set up a Data Academy which is made up of three areas: learning and development, workforce planning and data ethics. There is one post focused on data ethics with the MPS seeking to recruit a suitable candidate.

During its consideration and application of facial recognition technology, the MPS sought dedicated external support and advice on the ethics of this new capability, including from the MOPAC/MPS Ethics Group. The learning from this is influencing the MPS's approach to embedding data ethics.

Description of the approach

It is early days for the MPS, as it seeks to embed data ethics into all aspects of its operations. Taking an open, transparent approach is fundamental to data ethics and the Data Office is looking at the ODI's Data Ethics Canvas for inspiration. They are acutely aware of the responsibility that comes with the large amount of data they hold, how it is used for decision making and the impact that has on public trust and confidence in the MPS.

The MPS knows that it needs to be transparent to build trust; two elements of the data ethics process which they see as key to achieving this goal are having an independent scrutiny group and a system of peer review to advise how the MPS can



use data for public benefit. The Data Office will need resources to develop its governance structures and create a data ethics board

There is much to be learned from work going on in the West Midlands where they have already set up a data ethics committee to provide advice on the work of its team of data scientists who are working on 'wicked problems' faced by the force.

The Data Office has reviewed existing data ethics frameworks from different sectors. They are looking at how they can enshrine ethical considerations into an integrated impact assessment (encompassing DPIA and EIA). The MPS is keen for operational staff to spend more time thinking through and articulating to the public the 'what and why' of decisions made through the use of data, rather than spending vast amounts of time form filling. It's a balance that the MPS is committed to achieving.

When it comes to data literacy, the MPS is committed to improving it for all staff. The MPS expects its staff to have a base level of data literacy and they provide training through a mandatory e-learning package called *Information and You*. This includes bite-sized videos on various topics relating to data literacy and the Data Office intends to add in a new video on data ethics to enhance this first level of data literacy. The MPS also offers data literacy training at levels two and three aimed at data professionals and those with data leadership roles.

With the [additional financial investment](#) in the MPS's Data Office during 2021/22, part of the focus is on maturing critical data capabilities like data quality, and data sharing.

The Data Office is already thinking about how to create an end-to-end process for data ethics in all products that involve the use of data. Part of that is learning from the role of independent strategic advisory groups (IAG) that already exist in other parts of the organisation. The IAG provides advice from a public perspective, this can be helpful in setting the agenda and guiding discussion that can influence decision making. The advisory group includes members of the public and where the MPS establishes a similar arrangement for data ethics, it can then ensure citizen participation in its work.

Next steps

The Data Office is focused on recruiting a data ethics lead to help it embed data ethics in the MPS. The data ethics lead will seek advice from other organisations, build networks and understanding to help it develop the data ethics framework. While the MPS expects all of its staff to have some understanding of data ethics through the training described above, there are benefits of also having a dedicated role where the post holder can create a framework, socialise that among staff,



co-ordinate delivery and develop governance processes to embed data ethics as part of how the MPS operates.

At a national level, the College of Policing is revising the Police Code of Ethics to include data ethics. Richard Lewis from Cleveland Police is the National Police Chiefs Council lead on data ethics and he discusses this in a [Tech UK session on embedding data ethics in policing](#).

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