



Data ethics case study - Police Scotland

Summary

Police Scotland recognises that data ethics is an area of growing importance across UK policing and is committing resources to maximise the use of data for public good and ensure the legitimacy of the police service. To achieve this, it is:

- Committed to publishing a Data Ethics Strategy with and underpinning data ethics framework
- Integrating data ethics as part of the role of its senior leaders
- Establishing an independent Data Ethics Scrutiny Group
- Embedding data ethics into project management processes
- Learning from other police forces and from data ethics experts in government and elsewhere

Origins

[Police Scotland](#) was established in 2013 and is responsible for policing across the whole of Scotland. It is the second largest police force in the UK with over 23,000 staff. Denis Hamill is the Chief Data Officer and Chief Inspector Jackie Dunbar leads on information assurance and data ethics with one post dedicated to data ethics in her team.

In February 2020, Denis Hamill gave a presentation on [Data, Policing and the Public Interest](#) where he set out the various factors driving data management in Police Scotland and there he highlighted data ethics as an emerging focus area. This came shortly after the roll-out of a digital device triage system commonly known as [cyber kiosks](#), desktop computers containing specialist software, enabling trained police officers to view information stored on a mobile phone or tablet, which may be relevant to a police investigation or incident. There were considerable concerns by politicians, media and campaign groups about the cyber kiosks and the ethical use of data and as a result, Police Scotland sought to learn more about the subject.

Denis and his team have been working with the [Centre for Data Ethics and Innovation](#) to develop Police Scotland's approach to data ethics.

Description of the approach

Police Scotland reviewed the CDEI publication [Review into bias in algorithmic decision-making](#) in the early stages of thinking about data ethics and was keen to learn from the experience of West Midlands Police [Ethics Committee](#). Police Scotland has now developed its own data ethics strategy, with leadership from the Chief Constable who recognises the importance of the topic and has given the Data Office



ambitious targets to deliver the strategy and implement the change he wishes to see. It is currently going through an internal review process.

Oversight and governance of Police Scotland comes from the Scottish Police Authority (SPA), it is a public body of the Scottish Government and holds Police Scotland to account. Police Scotland is currently working with the SPA to ensure the proposed framework provides the required oversight and provides the Scottish public with absolute reassurance that ethics are at the center of decisions in respect of new and emerging technology and that data collected is used responsibly.

The creation of a scrutiny function is a key part of the strategy. Police Scotland is keen to have independent assurance of data ethics for its projects going forward. This group would be independent from Police Scotland and include people drawn from civil society groups, industry experts and people with technical knowledge.

Separately, Police Scotland is starting to introduce data ethics assessment into its project management processes. CDEI has helped Police Scotland to develop a triage process to think through the risks of using data to deliver projects. They need use cases to test the triage process and have looked at five existing projects to retrospectively review data ethics and see what they can learn from them.

To do this, the Data Office worked with project managers to complete the data ethics triage grid and determine the level of risk in the project and what mitigation could be used to reduce or manage that data ethics risk level. The triage process would ideally take place at the start of a project and be revisited later at suitable 'gateway' points to check if anything has changed. This will provide the Project Board with assurance that data ethics is kept both under review and is actively managed.

All project managers working for Police Scotland will receive training about data ethics and how to use the triage grid. The intention is to normalise data ethics as part of the project management process alongside data privacy and equalities impact assessment processes.

Next steps

The Data Office is working through the governance processes to sign off the data ethics strategy in Spring 2022 allowing the data ethics governance framework to be put in place. A recently appointed data ethics lead will drive this forward within Police Scotland.