

INTiLE Interview with Interviewee 5

Q2

Interviewer

And there we go. It looks like it's now um recording, so we can start with the questions. So this first question looks around your previous experience. So would you tell me about your experience of introducing new technologies into UK law enforcement?

Interviewee 5

Errm yeah, so I probably got a few different experiences of introducing new technology just because of different roles that I've done in the 14 years I've worked in UK law enforcement.

And so probably the first thing to kind of highlight is that I've been on the kind of receiving end of new technology. So being a kind of subject matter expert in my business area and being the first organisation to receive a particular new system that has been rolled out nationally. So I can tell you a bit about that if you're interested in hearing about that so.

Interviewer

Yep.

Interviewee 5

And so yeah, that was quite interesting. So that was in 2014. It was a new national system getting rolled out across the whole of the UK but coming to *[redacted – force name identified]* first just because of timing because we had *[redacted – event would identify the police force]* coming up. So between 2014 and 2018, I was part of a group of business users, but working as that kind of subject matter expert representing the organisation and our engagement with a national programme. So feeding back on issues around about the technology itself and its performance, but also the associated processes that that went with the new tool so I can reflect on some of the lessons learned on that later on.

More recently I've worked in an assurance role working on data protection impact assessments, so had spent three or four years in that role, so that brought me close to implementation of technology within the organisation and without wanting to speak about any specific technologies, but things like new tools in our digital forensic suite. Tools used by our demand and productivity unit and some robotics process automation tools and new digital evidence sharing capability. So lots and lots of basic, any new tool that's been introduced in their organisation, that process

personal data obviously had to do a data protect impact assessment. So was quite close to that. And then laterally in my role as [redacted – would help identify interviewee], I've been doing that since a year passed in January and working with change projects and other business areas who are implementing new technology. So for any project that involves data-driven technology, there's a requirement now for data ethics to be done so and then data ethics and potential further oversight and things like that. So I'm working on that type of project.

Interviewer – FQ2

So is there anything that came from that experience that you would use with any sort of future similar requirement?

Interviewee 5

Errm yeah, so I think I probably learnt lots of things from the different roles and I was kind of reflecting as well going back to my experience of having new technology implemented to me and the kind of feedback as a user as well. So I think the two things that leap out at me and that will probably speak about is as we go through today kind of common themes for me.

And the first was that new technology has to run in tandem with new processes as well. So if you have introduced a new technology, users have to know how to use it and why so.

And that was really learning from that the the project that mentioned 2014 to 2018, a brand-new tool that changed the way that we would work. But the maybe the associated policy and processes weren't completely up to date.

Errm, another key piece of learning for me that has been apparent throughout my more recent roles is that absolute requirement to have clear governance arrangements for implementing new technology, having a defined path that projects have to go down.

Based on risk but that identify what scrutiny is required. What consultation is required, what approvals are required and just having these really defined governance routes.

Q3 Interviewer

Okay and that actually leads me on to my next question, so maybe a bit of duplication, but there's no problem with that at all. So it is about governance. So what governance considerations do you feel are necessary to introduce new technologies to law enforcement?

Interviewee 5

Hmm.

So I think as I kind of said, I think you need to have a kind of defined path that things fall down. So if you're looking at something like a formal change process, you may already have that through this stage gate process and through the internal organisational requirements for stakeholder engagement and so on.

Errm, but yeah, considerations around about the degree of external scrutiny and approval that required. So if for example, it will refer back to [redacted – police force named] for so for us, the [redacted – police force oversight body named], how much involvement they need to have.

Errm, absolutely key that you have engagement with the right stakeholders and follow their approval routes. So that's things like linking in the chief data office to do data protection impact assessments or linking with the digital division, if they have design authorities and all that kind of thing to go through.

And I think probably another thing, it just key to me even think about governance as well. I think what in law enforcement were maybe quite good at having governance roots and defined pathways for project implementation, but we're maybe less good in business as usual. So really important that any any governance considerations don't just look at the implementation of a piece of technology but look at its ongoing and evolving use especially in scenarios where you'll see use cases will change you, you're bringing a piece of technology to do one thing. If that technology can later down the line be used to do something else, you need to have the proper governance round about that as well.

Interviewer – FQ3

Yeah. And do you think those considerations that you're talking about are all readily available at the moment and are they achievable within law enforcement?

Interviewee 5

I think, I can I can only really speak about my experience and I think as I say, we're very good in a change process, having these governance roots and there will be people that say that there's too much governance to get a project approved, you know to go through right from pre-project assessment all the way through the different change boards and all these different things. So in my experience we are good at doing that in change and we are good at communicating what the internal governance arrangements are. But what we're less good at or what we have been less good at in the past is thinking out what these kind of trigger points are for things that are not mandatory, so things like public consultation or public engagement and or or even data ethics. So one of the ways we've addressed that in [redacted – police force name] is we've recently introduced what we're calling our [redacted – capability

name which would identify police force], which will basically take a business area if they want to bring in a new piece of technology. It just helps them follow those steps in logical order to ask the right people.

Let's do data ethics, does this project require further scrutiny? But also asking someone who works in an engagement team, for example, do I need public engagement, do I need public consultation? Do I need to go to their reference group? All that kind of thing, and how having the process really, really defined? So I think we're very good at that and the kind of implementation phase. And I think we're getting better at the business as usual. We've just recently started up moving towards a kind of data governance model with our chief data office and have recently established data owner groups. So could moving away from that information asset owner group or information asset owner model to a data owner model and then having these data owners having responsibility for business as usual as well. So making sure that they understand how their technique, how their data is being used for what purpose and just kind of avoiding that from creeping so.

So the short answer to question is I would see where fairly good at implementation for bigger projects. We're getting better at business as usual for bigger projects, but with the best will in the world, sometimes you don't know what you don't know and I'm a little bit unsighted, you know, we may be less sighted on what's happening and in business areas maybe have a tool and they've discovered they can use it for something else or they don't have to go through a change process because they don't have to procure anything because they're getting it for free from another agency or a supplier's offering offering them a shot of it that that kind of thing. So we hope the right space path, we will kind of plug that gap a little bit cause it can set the picture, the change process. So seeing improvements, but not quite there yet.

Q4 Interviewer

So next question is around the requirements for introducing new technologies. So thinking about these requirements, what do you think are the main building blocks to successfully introduce such new technologies?

Interviewer 5

Errm, so I think the first thing I've probably is that can take it right back to basics and have that kind of pipeline of new technologies. And I think what we're sometimes not very good at and learn enforcement is actually solving problems, defining problems and then looking for technological solutions. What we're very good at sometimes is here, here's a solution. Now, what's the problem type thing? So I think that kind of the first building block I guess, has got to be a defined pipeline driven by business need.

Errm, and within certainly within [*redacted – force name identified*], as we like

everyone have to respond to the financial pressures for under.

I think our intention is probably to move towards a more kind of product centric model. So we will have products. So you can if you start with the problem, the first thing you do is engage to find out, do we already have a technical solution that would work for that?

Errm so yes, I'd say that's probably the two main building blocks are I can a pipeline and that kind of business intelligence driven approach of trying to fix certain problems and and then kind of moving into that clear user engagement about what they actually, what they need. And then as we've touched on ready these kind of proper mechanisms for scrutiny. So including data ethics, public consultation, engagement with internal stakeholder and errm all that kind of thing.

Interviewer – FQ4

OK. So is there anything which may prevent the successful implementation of new technologies for law enforcement?

Interviewee 5

Errm, always, always. I think probably. And the biggest challenge I suppose when we talk about UK law enforcement, cause I think that that's the the kind of scope of the work that you're doing? I think that's gonna be very challenging for a number of reasons. I am not least against speaking for [*redacted – police force identified*] perspective because policing is [*redacted – identifies police force regions*]. I think that national cohesive picture is going to be really, really difficult to paint because, as I'm sure you, you're aware um, but you know, I think different forces will have different risk appetites roundabout technology will have different relationships with the populations that that they serve. Errm.

Different profiles, you know, different, different policing priorities, different budgets and different influence from their police and crime commissioners, which are obviously political posts as well.

Errm, so I think all these things will make it quite challenging. To be honest, I think, and even within an individual force it's it's trying to do anything in the current economic climate, I suppose it's always gonna be challenging as well.

Q5

Interviewer

Yeah, okay. Thank you. The next area's around lessons learned. So thinking about either your own experiences or your knowledge around new technologies describe what lessons you feel can be learned for those to help introduction of other new technologies.

Interviewee 5

Errm, so I think about just things that that I have personal experience of and then I guess there are maybe some kind of bigger cases that we can look at as well. But so I think absolutely as we can touched on and I mean lesson learned from project in [redacted – police force identified] that didn't go so well is having these proper mechanisms in place to do, take you through the governance at the right time and in the right order.

Errm, engage in your oversight bodies as soon as possible, so your new technology doesn't come as a surprise to anyone and have these conversations with your strategy and engagement people to see is public engagement appropriate, and if so, how do I do it? Because certainly in our experience, because we didn't do any public engagement for the project I'm thinking of and I would absolutely actually defend that position because it wasn't necessary.

But you we can have lost control of the narrative around about the technology, and the conversation went beyond the scope of what that particular piece of kit was being brought in to do and got right into the kind of fundamental underlying legal basis for the wider piece of processing. And I think there's lessons learned there from the live face recognition trials as well. So you need to be 100% nailed on that what you're doing is lawful and you can define and justify your lawful basis.

I obviously am also believe very strongly that you need to have a robust data ethics process and to provide reassurance to public and also to your force executive and to your oversight bodies as well, because they'll be looking for not just the compliance side, which is data protection impact assessment says yes, equality and human rights impact assessment says yes, but actually to demonstrate that we've gone beyond that and fundamentally, this is the right thing to do and we are doing it in the right way.

Errm, I think also a key lesson that we've learned from another project that implementing just now is be really, really robust in you're procurement process. So make sure your suppliers can deliver on the promises.

Errm and also be really really robust in your evaluation stage within the procurement process as well. So we're having challenges since now with the project where what was in our initial requirements hasn't been met and now it's kind of trying to resolve that situation is really, really challenging. So very robust engagement with suppliers I think is essential.

Errm, where possible as well do a small scale proof of concept to learn lessons from that.

But I think we need to be really careful as well because I think sometimes law enforcement we're guilty of doing a proof of concept or a kind of smaller scale ruler of technology, capturing lessons learned, but then not demonstrating that we've

learned those lessons.

Just in the same thing again anyway. Um, so yeah, where possible, I think a small scale proof of concept as long as you actually learn from it.

But all these things take time and we need to kind of strike that balance as well that we don't end up stifling innovation because what we need to do is, you know.

With the best will in the world, the people that we are investigating and all that kind of stuff, you know, they're not going through these processes. So we can't have the scenario where the bad guys are at three or four years ahead of us because they don't have to go through what we go through, so really, really difficult balance to be struck I think between providing that public view assurance, but keeping up, you know, moving it at pace as well.

Interviewer – FQ5

OK, lovely. Thank you. There were a number there. So which of these do you feel will be the most impactful to help ensure the successful introduction of new technologies?

Interviewee 5

I think if I could only pick one.

It would be the early engagement with stakeholders. Early meaningful engagement with stakeholders, I think.

Q6

Interviewer

Yeah, okay. That sounds good. Thank you. The next area is around erm, key to success. So tell me what you think the most important keys to successfully introducing new technologies in law enforcement are.

Interviewee 5

Erm, I probably don't have much new to say on that, that kind of covered maybe covered off in question four a little bit, but I think probably the key to success, it's making sure the technology is it's the right technology if the problem you're trying to solve cause I think fundamentally if you can make that case that I'm trying to solve a policing problem, you're going to get that buy-in from the state because it will be easy or you'll be able to make the case to your stakeholders to justify what you want to do because you're quite clearly define, you know, we have X as a policing priority. This tool will help us with that because of Y and that helps get the stakeholders on board. So yeah, I'd say that's quite important erm, and then as I keep coming back to just making sure that you have these robust governance arrangements in place to follow, erm, in a logical way.

[FQ6 NOT ASKED AS NOT MORE THAN ONE ASPECT RAISED IN Q6]

Q7

Interviewer

Okay.

That sounds good. Thank you. We've touched on the operational parts now. So the next question, um, sort of extends on that around the urgent operational requirements. So can you explain the impact which urgent operational requirements might have on introducing new technologies to law enforcement?

Interviewee 5

Errm, yeah, so I think, when we look at something like, look at what we went, what the country went through during COVID. And I think it's quite clear that for all the I would absolutely start off by saying that we have to follow robust governance process and introducing new technology. But I think when we look at the response to COVID at a national level and we saw things like that that *[redacted- regional unit identified]* relax their position, information sharing and all that kind of thing. So I think if you have a genuine urgent operational requirement, there needs to be that kind of scalability.

Errm, and be able to be have that kind of adaptive governance approach to allow a certain degree of scalability, and I think that urgent operational requirement needs to be really clear and defined. You know, it can't just be, I think this tool might help with this particular enquiry and then all of a sudden it becomes an urgent operational requirement. I think you need to be really, really clear about why you're existing suite of tools aren't going to help you in a particular scenario.

And really have done, you know, started with the problem and gone looking for a solution and not just like kind of I've got this tool it might help this inquiry so be really, really clear on what that urgent operational requirement actually isn't and how the technology will help.

And I think we need to organisationally wide, just make sure that you have the resources to support that as well. Cause with the best will in the world, you simply, it would be unlawful to introduce a new piece of technology without a data protection impact assessment for example. So you want to make sure that you have the resources that can be scaled up to do that adaptively and quickly.

Errm, from a data ethics perspective as well, it could be the most, errm urgent operational requirement in the world, but we would that, the risk of not doing the data ethics assessment probably was still outweigh that as well, so I think it just making sure you have the right people to support that as well, errm, and ultimately I suppose it's for your risk owners to accept those.

Errm, that balance of risk in exceptional circumstances.

Errm, so yeah, it's not impossible and you know, we wouldn't want to stand in the

way of an urgent operational deployment, if used technology, could be justified, but I would start with the problem. If the technology could solve it, you need to be adaptive in your governance approach to take it through a bit quicker.

Interviewer - FQ7

Okay and it's possible that there could be some negative impacts as a result of urgent operational requirement. So how might any of these negative impacts be best overcome?

Interviewee 5

Errm yes, I absolutely agree that there could be negative impacts on thinking about um, especially in scenarios whereas the organisation, if you have committed publicly to doing, to managing the introduction of new technology in a certain way, or even gone a step further and said that you won't introduce a particular piece of technology. So I think that really comes down to making sure that you're the people who own the risk so that your SIROs are fully briefed on the benefits and the disbenefits and how to weigh that up and you've got really clear decision making documented.

Q8 Interviewer

Okay so the the next area, um, we've talked quite a bit now around sort of the technology aspects and this is now looking at any non-technology factors. So do you consider there are any non-technical or technology factors which may also be important to show ensure successful implementation of new technologies and if so, what might they be?

Interviewee 5

Um, yeah. So I think there will be other factors need to be considered, you know, right down to the kind of organisational culture within a particular force. And it's it's appetite about towards new technology and its relationship with the public in that particular area. It's relationship with the Police and Crime Commissioner.

Errm, it's it's risk, it's it's, it's funding, it's it's risk appetite, it's organisational culture, all these kind of things, I think feed into.

Errm and help explain why some forces have.

I mean more at the forefront of introducing new technology, while others maybe tend to lag behind a little bit.

Interviewer – FQ8

Yeah. And what level of importance do you think that these non-technological aspects have compared to the actual technology side?

Interviewee 5

I would say there certainly as important, because I think that you know you have you have decision makers there who won't necessarily be involved in the technology itself. They'll be part of a kind of, wider conversation.

So I would say any sort of framework that that's put in place to consider the introduction of new technology can't just focus on the technology. It's got to focus on that kind of wider context, for law enforcement as a whole.

Q9

Interviewer

OK. Thank you. The next question is around visions for technology. How do you think developing a vision about implementing a new technology within law enforcement can be best achieved?

Interviewee 5

I think it'll be challenging, errm, I think.

It's it's, it's difficult, I suppose, for me to comment in too much detail because [redacted – force/agency name identified] have luxury of sitting a little bit outside of a national framework. But yes, I think.

Again, it will be a bit, bit of balance, so you would want to document what a defined governance and should should look like.

But also make that scalable as well.

Errm, and I guess to prevent duplication of effort you make, it might be beneficial to make as much use of national forms as possible. So for example, if a governance framework recommended, errm, a data ethics oversight group or an independent data ethics group separate sitting outside policing, it would make sense to only have a small number of those rather than, you know, replicated across every single force in the organisation in the country. I think as well you would want to take. You also wouldn't want.

Lots of duplication of effort in terms of.

If different forces were introducing similar technologies.

So I guess I'm sort of at the very least kind of peer review or something, but you know, we'll see that just now when a new technology we introduced, you may see 43 different data protection impact assessments.

So I think a degree of central coordination is probably the word rather than the control.

Interviewer – FQ9

OK. And who do you think really in the overall implementation process, do you think should create this vision, what what sort of level should that be?

Interviewee 5

Errm, in terms of existing organisations within law enforcement, NPCC or Home Office, like that kind of thing.

Interviewer

Yeah.

Well, either internally or within the field of law enforcement.

Interviewee 5

Hmm.

I I think that's another challenge as well. It's something that.

It's if a challenge is to create a framework within UK law enforcement. I think that's very difficult for the reasons I can touch on in terms of *[redacted – regional location identified]*.

Errm.

It feels like it's got to be done.

At the centre, using existing mechanisms, so it feels like that should be somebody like the NPCC.

Errm, or whether a new body could be created potentially, but I don't know how much appetite there would be for that.

Q10

Interviewer

Okay no problem at all. Next one which may be something you're either aware of or not been exposed to is around preventing resistance. So would you describe any resistance which you feel may arise from the introduction of new technologies for law enforcement?

Interviewee 5

Errm, so we've certainly seen some some resistance and aware of resistance from the public about new technologies being introduced and obviously the kind of the main one that we see across the UK is around live facial recognition and the kind of controversy around.

Errm, yeah. And I think it's interesting to see all the discussions about ChatGPT just now and all that, all that big international dialogue about errm, AI and and its impacts

as well. So it'll be interesting to see the kind of public perceptions towards that kind of technology as we start to look towards introducing them in policing, so absolutely yeah, I do expect there will be resistance to introducing technology.

Interviewer – FQ10

And how do you think that might be best overcome?

Interviewee 5

I think through through education and clear messaging and clear public engagement because certainly, but when we had the bad experience of alluded to about a piece of technology we wanted to bring, we kind of lost control of the narrative and the debate because it turned into a much wider debate about something that this technology wasn't designed for. So I think it's about getting in front of it and speaking clearly to the public about what we're doing.

Errm, but it's it's easy to say that because.

I don't know if the public would.

Sometimes they maybe don't understand enough about the technology and when you look at something like the algorithmic transparency recording standards that the CDEI are trying to develop, that's got.

Kind of the the basis of what we're trying to achieve here. So being really transparent with the public about the use of algorithmic processing. But actually I find that really really problematic because.

I think it's really difficult to strike the balance between informing the public.

Telling them so much that becomes harmful, or not telling them enough and finding that actually, as law enforcement, we're controlling the narrative and in a way that's almost worse than not being transparent. So I think it's very, very difficult to to overcome the resistance. I think all we can really do is make sure that.

The public are fully briefed about what we're actually trying to do, engage with the representatives as well, so you know.

In *[redacted – regional area identified]* we have the *[redacted- oversight body identified]* who will look at policing and give us advice on on new technology and things like that. So that's as engaging directly with elected representatives. And then obviously there's opportunity to have engagement with things like victims rights groups or the Biometrics Commissioner, Information Commission, all these people who are there to protect the rights of individuals.

So engagement and education as opposed are the short answers to that question, but it's.

A lot more complex than it sounds.

Q11

Interviewer

Okay, thank you. And the next question then is about towards the end of the introduction of them and how we start looking at them being successful. So thinking about a successful implementation of new technologies for law enforcement. What do you feel needs to be achieved to attain this level of success?

Interviewee 5

Errm, I think we need to move beyond the implementation phase into a business as usual. Errm, the technology has to be working and delivering what it was set out to do.

Errm, it has to be understood by all its users, errm.

Where appropriate, with maybe have had a degree of public engagement and the public know we're using a particular tool and why we're using it and it's and it's performing effectively, errm, they would need to be ongoing business as usual governance arrangements as well. So that if the scope of the technology changes or if issues come up or legislation changes, anything like that, that could impact.

You know, we could be in a good place a year after implementation, but we want to make sure we're a good place 5 and 10 and 15 years after, so making sure that we have governance arrangements to manage business as usual as well.

Interviewer – FQ11

Yeah. OK. And you sort of touch on the next part really, which is do you feel there's a time frame within which this needs to be achieved for it to be accepted as being successful?

Interviewee 5

I don't know if we could define, a time frame as such because, it would it be difficult to commit to time frame because public perceptions of technologies change.

Errm, and the reality is and law enforcement things do do move slowly so.

I suppose when something becomes so accepted you don't even think about it. So it's something like CCTV processing. I think it's quite interesting when we have conversations about things like the introduction of text analytics or kind of facial recognition, all these things that we bolt on top of CCTV, it's almost a given that CCTV is widely accepted.

Errm, and we've probably had CCTV in the UK for, I don't know how many years, 20 years, 30 years errm, and it's just accepted but.

I don't know, you know, would there have been resistance to law enforcement use of CCTV when it was first introduced that has kind of just in time become normalised.

So I I wouldn't like to say an exact time frame. I think we'll just know when there's that kind of unwritten societal acceptance of a particular technology and kind of

acceptance within law enforcement agency that this tool does support what we need it to do and it does it well and we manage it properly.

Q12

Interviewer

Okay, thank you. And we're on to the final question now, which is a kind of um catch all for anything we may have not covered. So are there any other factors or issues we haven't yet discussed which you feel are important for successful implementation of new technologies?

Interviewee 5

Errm.

I don't think so. One thing we haven't really touched on.

Legislation and how legislation doesn't really keep up the implementation of technologies. Um, we'll have data protection legislation, we'll have equalities legislation we'll have different pieces of legislation will exist but we are missing something that tells us how to introduce new technologies.

I'm actually okay with that because of the pace of technological change.

Errm.

And I suppose it's just about kind of making sure that we are keeping up to date with what's happening. I think if you know we're talking two years ago, we probably wouldn't have, we wouldn't have known what ChatGPT was, we wouldn't have known about the explosion of generative AI, which seems to have just gone absolutely exponentially grown in the last six months. And to the point that.

I think we'll see the same again in the next six months as well, so.

Errm, I suppose yeah, just about that could need to keep abreast of technology, but also what's happening across the rest of the world as well.

Interviewer

Yeah.

Interviewee 5

Errm.

[FQ12 NOT ASKED AS RESPONSE IN MAIN QUESTION DID NOT FACILITATE THIS]

Interviewer

Okay.

Thank you very much. I'm going to, that's the end of the questions. So I'm going to stop recording now.

Interviewee 5

Okay.