

Organised Crime Research









Accountability Principles for Al

Session overview

10' Introduction round

20 'Introduction to AP4AI

30' Interactive session 1
10' Coffee break
30' Interactive session 2

15' Coffee break

20' Review of discussions and next steps





Resilience, Intelligence and

Organised Crime Research









Introduction to AP4AI

Coordinators



Supporting and advising partners









AP4AI Objectives

- Robust set of agreed and validated accountability principles which integrate practitioners as well as citizens' positions on Al
- Concrete, practical, actionable compliance
- Software based assessment tool for security practitioners

Create



- Security-relevant AI innovation in Europe (significant proportion developed outside Europe)
- EU-R&D (e.g., facilitate social acceptability of future AI tools and capabilities)
- Proposed EU AI Act

Support



AP4AI Framework – Why an Accountability Framework?

Accountability is bound to enforceable obligations and thus actionable.

A practical mechanism to ensure that legitimate interests (as well as concerns, fears and hopes) of all stakeholders are engaged with and factored in throughout the full decision-making process about LEAs' Al capabilities.

Organisational accountability in general (e.g. LED, FR or GDPR) is a well-established concept, at present there is no firm definition of LEA accountability in the context of Al.

(Akhgar/Bayerl, 2021)

Accountability as core requirement

justification monitoring enforcement

Methodology: Expert driven, Citizen focus, bottom up approach

Law enforcement agencies

Citizens

Judiciary

Human rights experts

Ethical AI experts

Civil society organisations

Al developers / industry

Academia / Research









Cycle 3 - Expert validation



Cycle 2 - Citizen consultation (30 countries, n = 6,674)



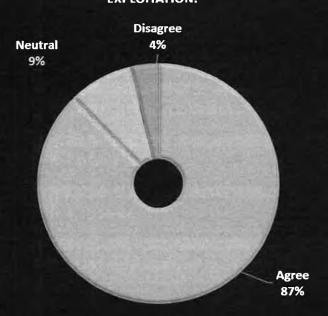
Cycle 1 – Expert consultation and state-of-the-art review

CITIZEN CONSULTATION across 30 countries

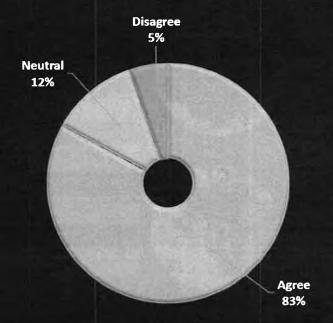
Please note: Results are presented as summaries across all 30 countries (n = 6,591, weighted data, merged categories)

BENEFITS OF AI

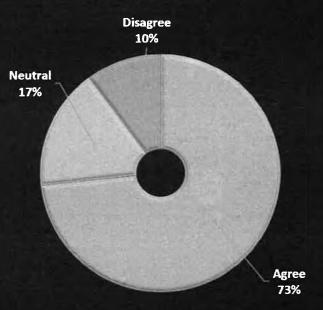
POLICE SHOULD USE AI TO SAFEGUARD CHILDREN AND VULNERABLE GROUPS FROM EXPLOITATION.



POLICE SHOULD USE AI TO DETECT CRIMINALS AND CRIMINAL ORGANISATIONS.



POLICE SHOULD USE AI-BASED PREDICTION TOOLS TO PREVENT CRIMES BEFORE THEY CAN HAPPEN.

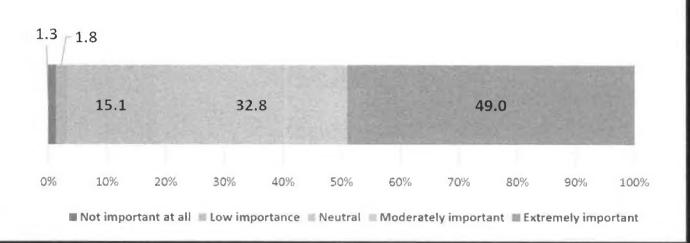


CITIZEN CONSULTATION across 30 countries

Please note: Results are presented as summaries across all 30 countries (n = 6,591, weighted data, merged categories)

HOLDING POLICE ACCOUNTABLE

HOW IMPORTANT IS IT THAT A UNIVERSAL FRAMEWORK IS CREATED THAT ENSURES THE ACCOUNTABILITY OF AI USE BY POLICE?





Review of existing approaches, frameworks (including laws, regulations)

Expert consultations (international, cross-disciplinary)



Expert validation



£ AP4AI

AP4AI Principles

- 1. Legality
- 2. Universality
- 3. Pluralism
- 4. Transparency
- 5. Independence
- 6. Commitment to Robust evidence
- 7. Enforceability and Redress
- 8. Compellability
- 9. Explainability
- 10. Constructiveness
- 11. Conduct
- 12. Learning Organisation

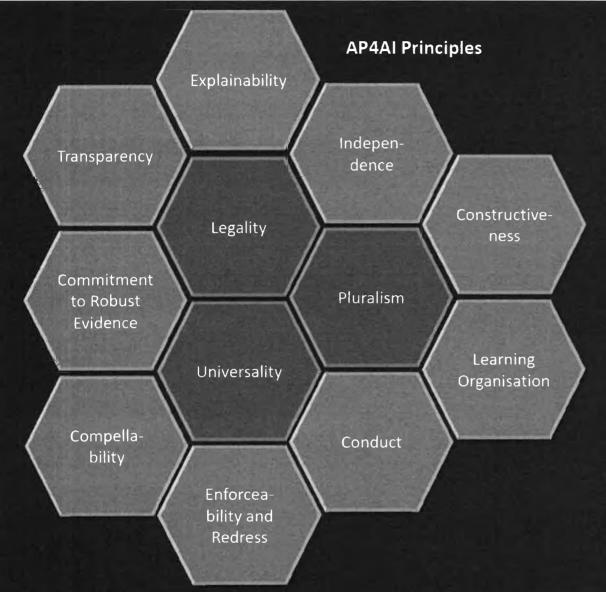


Citizen consultation

AP4AI Framework Blueprint -> AAA, Implementation mechanism

AP4AI Online Tool

AP4AI Training package
Kite Marking



- Legality Al use is entirely in line with the law
- Universality every aspect of Al use (algorithms, data, methods, impacts, etc.) without exception can be monitored and assessed
- Pluralism every group involved in and affected by Al use, without exception, has a voice in monitoring and assessing police use of Al
- Transparency all information to assess Al use and to enforce consequences is easily and fully accessible to groups that judge police use of Al
- Independence the people and groups that monitor police and enforce consequences are totally independent from police and organisations that design Al systems for police
- Commitment to Robust Evidence police are committed to providing evidence that is so robust that their Al use can be judged with confidence
- Enforceability and Redress it is possible to compel police to comply with all requests to improve their Al practices
- Compellability it is possible to compel police to provide access to all necessary information, systems or individuals to judge their use of Al
- Explainability all Al practices, systems and decisions can be fully explained to the public and oversight bodies
- Constructiveness police and groups that assess police use of Al always have a constructive attitude in their negotiations with each other
- Conduct all police uses of Al strictly follow professional standards
- Learning Organisation police are continually willing to change their current AI practices based on new knowledge and insights

Accountability Principle: Implementation Guidance

Name - Principle name, validated in expert consultations

Meaning – provides the Principle definition contextualised for Al and the internal security domain

Materiality threshold – offers an assessment of the relative impact that something may have an accountability within Al development or utilisation

Examples of applicable law – lists examples of applicable law pertinent to Al Accountability in the internal security domain

Note on Human Right Impact Assessment – provides an initial direction for HRIAs and alerts the reader about the pivotal role of HRIAs in the context of Al Accountability Principles

Note on Data Protection Impact Assessment (DPIA, where applicable) – alerts the reader to legal and ethical requirements of conducting a DPIA and, where applicable, a Privacy Impact Assessment (PIA)

Implementation guide—identifies the processes, activities, tasks, documentations, assessments, actions and communication needed for the realisation of the Principle

Operational considerations — provides clarification and further consideration about implementation of the principles for the operational environmen

UNIVERSALITY

Meaning

Universality provides that *ali* relevant aspects of Al deployments within the internal security community are covered through the accountability process. Effectively extending the 'jurisdiction' of the Principles to all who are subject to the Legality principle (above), this principle recognises the reality that Al applications are necessarily multi-partner input programmes in a frequently complex process and the need for public trust and confidence must extend to the whole ecosystem. This is not only in respect of the deployment of Al in a criminal justice context, but in all the related processes, including design, development and supply, to which accountability applies equally (including all domains, aspects of police mission, Al systems, stages in the Al lifecycle or usage purposes), and prevents contracting out or offshoring by the relevant accountable organisation.

Materiality threshold

While all organisations and individuals having a significant impact on/involvement with the AI programme must be subject to the Principles, there will be those whose role is too remote from the inputs/outcomes to be included. Examples might include some people who are purely involved in the technical installation of agreed equipment or provide generic project management support (they can be identified in the project's documentation). Universality applies a holistic, catchall provision to ensure there are no significant accountability gaps, but there will be many potential impacts and outcomes of the project not all of which will be of sufficient relevance/importance to be included. Similarly, some technical processes may not be of sufficient relevance to accountability to be included.

Examples of applicable laws

- National, European and International legal instruments, conventions, declarations and agreements specifically pertaining to Eurodamental Rights and freedoms, and secondary provisions relating to identified groups in the same respect.
- National and European legal instruments, conventions and agreements relating to the processing of personal data for criminal justice purposes.
- National laws protecting or creating individual rights in respect of the exercise of powers by police and law enforcement agencies.
- National criminal justice procedural laws, rules and directions, particularly in respect of fairness, presumption of innocence and the prevention of arbitrary decision-making.
- industry or sector-specific legal standards relating to public safety.
- National and sector-specific tribunals and formal procedures providing means of effective redress in applicable contexts.

Notes on Human Right Impact Assessment and Data Protection Impact Assessment

ALLIFECYCLE OUTCOMES AND MANAGEMENT Apply to all components and the complete Al system lifecycle. impacts of Al deployment been considered? (19) Vinestray of any to leave not at bettle religions by make, appropriate investigation investigation investigation in a selection in the selection in Respect privacy and date Mitto distancement the teaming EAL-JOHN MANUEL I BROWN OF G MEASURING COMPLIANCE feedback loops & communication Hew is compliance with this UP / DOWNSTREAM principle measured? Who is PROCESSES responsible for this? Have all processes affected by Ai been accounted for 00 Õ→□ OVERSIGHT Process documentation access and DELIGATIONS What quality assurance and bias HESPONS BILTIES initiaation processes do you have in place for the data lifecycle - for both acquired and collected Does everyone understand their data? responsibilities in respect of compliance with accountability? How is this ensured? Who is responsible for system desica Define and map the sends of role Who is responsible for system users responsibilities for impact Wild will be come to discount of a factor and it is discounted by the big of the company of the from design to deployment

STAKEHOLDERS

Have all relevant stakeholders

been considered including

national regulators and oversight bodies?

technik ol system?

SOCIETY AND

What efforts have been made to

understand and address

concerns and legitimate

characteristics requining

additional consideration

REASONABLE RISK

What are the remaining security

and privacy risks and why are

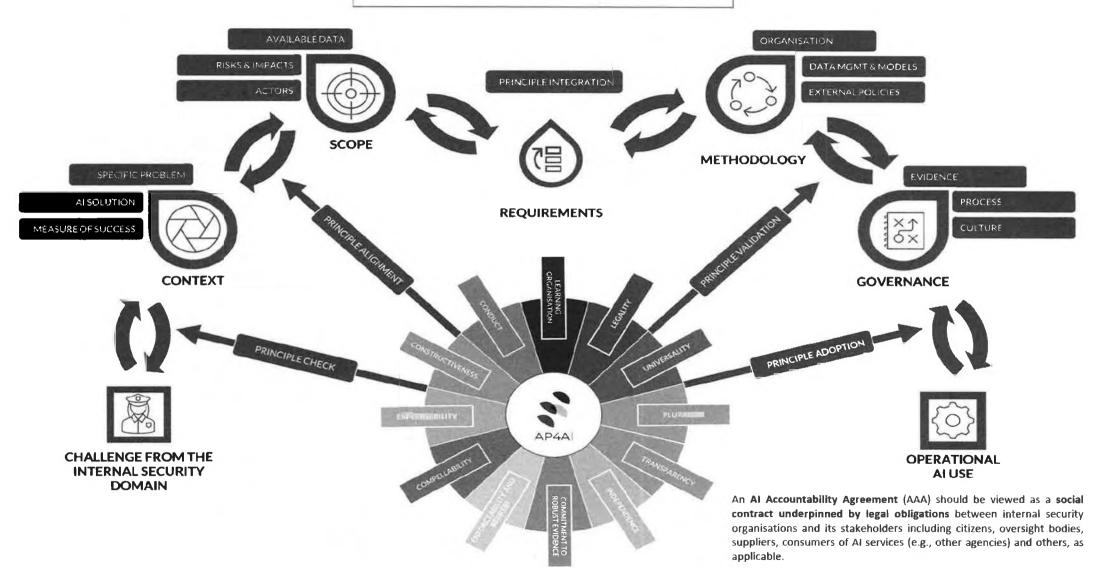
they reasonable?

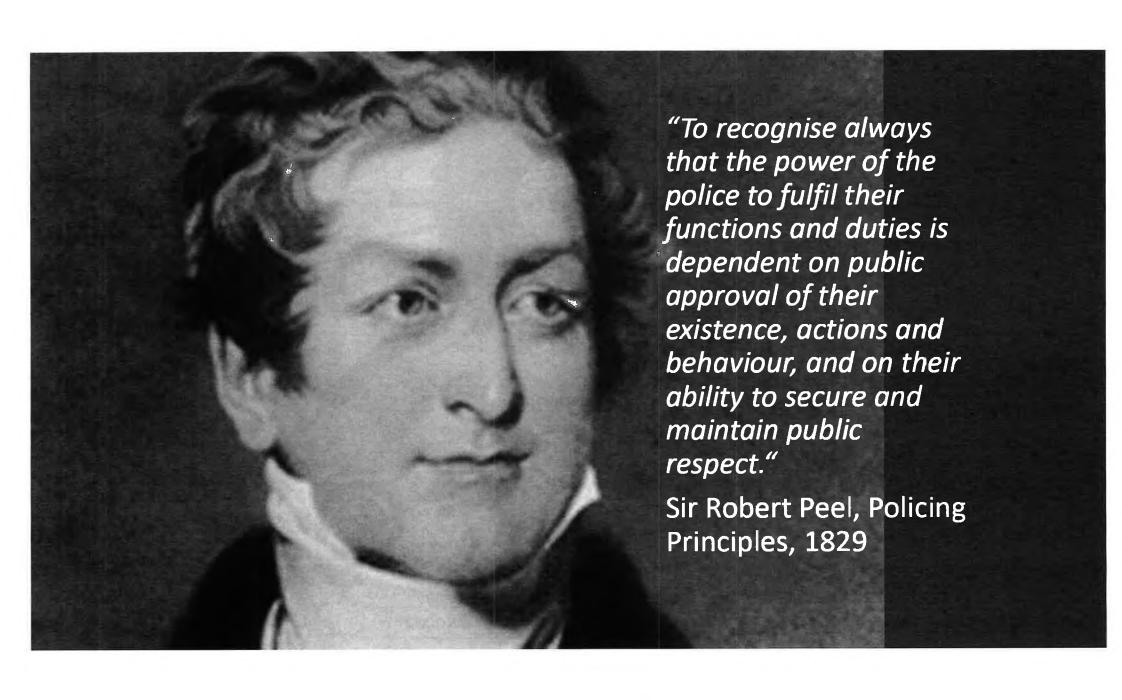
Internation pages and solution of

What is the parties and baser of a party.

expectations of specific sections of society and individuals having

AI ACCOUNTABILITY AGREEMENT (AAA) PROCESSS















Interactive session 1

Implementation for core application areas ("scenarios")

- Investigation of CSE and categorisation of CSEM (Child Sexual Exploitation Materials) Investigation of cyber-dependent crime
- Identification and prediction of serious and organised crime activities including cross-border issues
- Detection of harmful internet content such as terrorist generated internet content
- Protection of public spaces and communities
- Investigation of terrorism (including CVE) related offences
- Investigation and prosecution of financial crime (e.g., money laundry)
- Procurement of Al solutions by internal security practitioners
- Research and development for AI either by the LEA or a 3rd party intended to create the solution to be deployed for the internal security domain

Implementation support



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Exit

1 Application of law 0 is completed	Step 1 / Application of law How do the applicable laws apply in this context?		
2 Necessity and proportionality 0% completed	Check the list of applicable laws Tooltip explaining what this field is for		
3 Legislative gaps 0% completed	National, European and internaltional legal instruments, conventions,		
Demonstration of compliance 0% completed	declarations and agreements specifically pertaining to Fundamental Rights and freedoms, and secondary provisions relating to identified groups in the same respect		
5 Quality assurance 0% completed	National and European legal instruments, conventions and agreements relating to the processing of personal data for criminal justice purposes.		
6 Data provider and purpose 0% completed	National laws protecting or creating individual rights in respect of the		
7 Residual risks 0% completed	exercise of powers by police and law enforcement agencies.		
8 Exemptions and safeguards 0% completed	National and criminal justice procedural laws, rules and directions, particularly in respect of fairness, presumption of innocence arbitrary decision-making		
9 Privacy harms	National industry or sector-specific legal standards relating to public safety.		
10 Objective oversight 0% completed			
11 Equality 0% completed	National and sector-specific tribunals and formal procedures providing means of effective redress in applicable contexts.		
12 Public concerns 0% completed	Check for infrigements against rights and freedoms Tooltip explaining what this field is for		
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	Involve data protection and human rights experts		
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1	>	Application of law	Step 1 / Application of law How do the applicable laws apply to this context?
2 3 4 5 6		Necessity and proportionality 0% completed. Legislative gaps 0% completed Demonstration of compliance 0% completed Quality assurance 0% completed Data provider and purpose 0% completed Residual risks 0% completed	Check the list of applicable laws Tooltip explaining what this field is for National, European and internaltional legal instruments, conventions, declarations and agreements specifically pertaining to Fundamental Rights and freedoms, and secondary provisions relating to identified groups in the same respect National and European legal instruments, conventions and agreements relating to the processing of personal data for criminal justice purposes. National laws protecting or creating individual rights in respect of the exercise of powers by police and law enforcement agencies.
8 9 10 11		Exemptions and safeguards 0% completed Privacy harms 0% completed Objective oversight 0% completed Equality 0% completed Public concerns 0% completed	National and criminal justice procedural laws, rules and directions, particularly in respect of fairness, presumption of innocence arbitrary decision-making National industry or sector-specific legal standards relating to public safety. National and sector-specific tribunals and formal procedures providing means of effective redress in applicable contexts. Check for infrigements against rights and freedoms Toottip explaining what this field is for
			Regularly done by the supervision through their inspections, but also via Europol's consultations and notifications as well as processes established by Europol itself. Involve data protection and human rights experts Tooltip explaining what this field is for- The DPO is constantly involved where necessary due to applicable laws, but also pre-emptively where possible and advice is needed within Europol



New report - 21/09/2022 0% completed

Exit

Legality

All aspects and activities of Al accountability must be exercised in accordance with the law

Enforceability and redress

Ensures mechanisms are in place to enforce releobligations (legal, ethical, AP4AI) and recommen accountability oversight bodies as well as to qua implementation of remedies in case of negative i consequences or grievances.



Compellability

Requires that obligations are in place that ensure oversight bodies with access to required informasystems or individuals.



Universality

remit of accountability.

Ensures participation by all key public and private stakeholders promoting their democratic and collaborative engagement.



(5)

Explainability

Ensures that Al practices, systems and decisions explained.



Ensures availability and ready accessibility of information pertinent for assessing and enforcing accountability to all relevant stakeholders.



Constructiveness

Ensure a dialogical process between law enforce and judicial actors, and those performing accounfunctions, that is enabling and responsive.



Guarantees that monitoring and enforcement are independent from the people and/or organisations that design implement and/or use the Al system.



Conduct

Requires Al practices of LEAs follow professional ethical standard.

Commitment to robust evidence

Ensures that mechanisms are in place that lead to robust evidence which forms the basis for the assessment and enforcement of Al systems and their usage.



Learning Organisation

Ensure the wilingness and ability of organisations change current AI practices based on new knowl insights.







Legality

All aspects and activities of Al accountability must be exercised in accordance with the

Application of law

How do the applicable laws apply in this context?



Residual risks

Despite legal compliance, any residual risks particular to Al should be addressed.

Necessity and proportionality

Are the overring principles of necessity and proportionality complied with?



Exemptions and safeguards

Do any legal exemptions apply? If so, are appropriate safequards in place?

Legislative gaps

Some aspects of Al usage, including new developments and capabilities, may not be regulated in existing laws and standards.



Privacy harm

Does the use of Al deal with special categories of personal data, as defined by applicable legal norms?

Demonstration of compliance

How can compliance be demonstrated?



Objective oversight

is the appropriate oversight body engaged, in respect of the

Quality assurance

What quality assurance and bias mitigation processes do you have in place for the data lifecycle - for both acquired and collected data?



Equality An equality impact assessment (EIA) should be conducted considering impacts on affected individuals

Data provider and purpose

Will any data being used in the production of the Al system be acquired from a vendor or repurposed from existing datasets?



Public concerns

Legal compliance alone may not address wider public concerns.





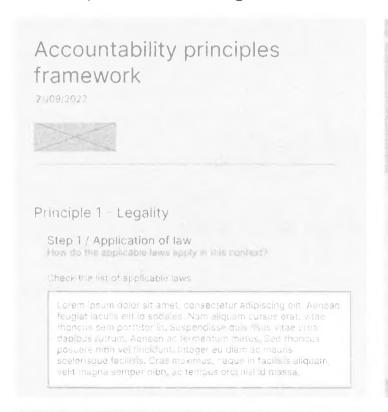
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Report	Completion	Actions
Report #01 - 21/09/2022	100%	Edit Download
Report #02 - 21/09/2022	30%	Edit Download



New report - 21/09/2022 100% completed

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Coffee Break 10 min



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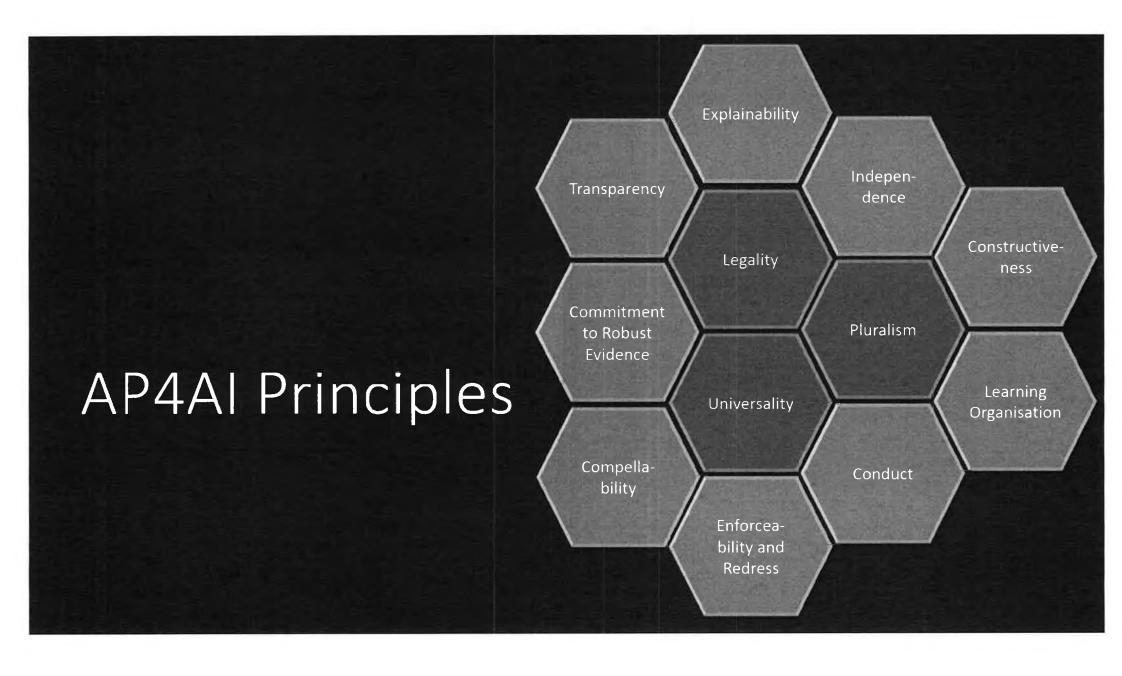








Interactive session 2



Conduct

all police uses of Al strictly follow professional standards

- **Personnel obligations:** Are all the people involved in making Al and putting it into place aware of their responsibilities and those of their teams?
- Oversight bodies: How are the rights and mechanisms of oversight bodies linked to existing LEA-internal processes with respect to Al principles?
- Existing frameworks: Are existing Al frameworks relevant for conduct?
- Process documentation: The processes facilitating accountability in respect of Conduct should form part of the information made available in respect of specific deployments of Al under the transparency principle.
- Available remedies: What remedies are available to and readily accessible by the complainant?
- Complaints procedure: How are complaints documented?

Pluralism

every group involved in and affected by AI use has a voice in monitoring and assessing police use of AI Al lifecycle management: Are all components and the complete Al system lifecycle, from design to decommissioning, considered?

Stakeholder evolution: Should stakeholders remain the same at all stages of accountability procedures and engagements?

Procedural information: Has all the information about procedures been given in a way that is clear and makes sense? Does this also manage expectations?

Stakeholder roles: Do participants understand their role within the process and the purpose of it?

Engagement strategies: In the true spirit of being open to everyone, have a variety of ways to get involved been used?

Citizen engagement: What form should citizen engagement take?

LEAs engagement: In which form should law enforcement agencies be included?

Universality

every aspect of Al use without exception can be monitored and assessed

- Al lifecycle management: Are all components and the complete Al system lifecycle, from design to decommissioning, considered?
- Up/Downstream processes: Have all processes affected by AI been accounted for?
- Responsibilities: Does everyone understand their responsibilities in respect of compliance with accountability? How is this ensured?
- Outcomes and impacts: Have all the outcomes and possible impacts of Al's deployment been considered?
- **Measuring compliance:** How is compliance with this principle measured? Who is responsible for this?
- Oversight obligations: What quality assurance and bias mitigation processes do you have in place for the data lifecycle for both acquired and collected data?
- Stakeholders: Have all relevant stakeholders been considered, including national regulators and oversight bodies?
- Society and inclusivity: What efforts have been made to understand and address the concerns and legitimate expectations of specific sections of society and individuals having characteristics requiring additional consideration?
- Reasonable risk: What are the remaining security and privacy risks and why are they
 reasonable?

Transparency

all information to assess AI use + to enforce consequences is easily + fully accessible to groups that judge police use of AI

- Recipients: Who needs to offer Transparency? And to whom?
- Public concerns: Are public concerns being addressed when making decisions about Transparency?
- **Dataset scope:** Consider the importance of the size, nature, and source of the datasets being used and the criteria for algorithmic processes.
- Maximisation: Maximising Transparency should be considered at all stages, from system development to results.
- Delivery: Make sure that Transparency is done in a timely, meaningful, and appropriate way.
- Measurement: What methods and standards are used to decide if the principle of Transparency Where has been followed enough?
- Restrictions: Are public concerns being addressed when making decisions about Transparency?

Independence

people/groups that monitor police + enforce consequences are totally independent from police + organisations that design AI systems for police

- Operational definition: Determine the nature and extent of Independence in a practical sense.
- Limitations: Determine potential practical or legal limitations to the overall aim of Independence
- Regulatory relationships: How are relationships of the accountability oversight body regulated with pre-existing oversight bodies?
- Scope: If total Independence is not possible, which form, and level of Independence is (in)appropriate?
- Knowledge acquisition: How will oversight bodies acquire the necessary specialist knowledge to be able to carry out informed, effective decision-making?
- Completeness: Information being provided to the oversight body must be adequate for the purpose of accountability.
- LEA positioning: Does independence exclude LEAs from accountability bodies?
- Communication: Have effective lines of interaction and communication with the oversight body been established?
- **Process relationships:** How are relationships between accountability processes regulated if (non-Al specific) accountability processes are already in place?
- **Component procurement:** If an institution is procuring parts or elements of the system from third parties, how are they instituting appropriate governance controls?
- Data procurement: If third-party data is being used in the production of the Al system, how are they instituting appropriate governance controls across the data lifecycle?

Commitment to Robust Evidence

police are committed to providing evidence that is so robust that their AI use can be judged with confidence

- Operational definition: How to define and assess "robustness", and who is responsible to determine "robustness"?
- **Process management:** Are these processes and procedures documented and understood by those who need to know?
- Resilience: Is the evidence sufficiently robust for these purposes?
- Intention: For what purposes might the evidence be used?
- Evidence capture: Are processes and procedures in place to allow the capture of the evidence in the required way?
- Storage and access: Is the evidence stored in a meaningful and accessible way?
- **Evidential constraints:** Is the evidence in its original form subject to legal or sector-specific constraints?
- Interpretation: How should non-Al experts learn to interpret Al outputs in the evidential context?

Enforceability and Redress

it is possible to compel police to comply with all requests to improve their Al practices

- Obligations: Which obligations are capable of enforcement?
- Fulfilment: Who determines whether obligations have been fulfilled?
- Selection: Which forms of redress will be chosen and how are they related to existing (national, international) redress possibilities?
- Responsibility and independence: Who determines the appropriate level of redress?
- **Comprehension:** Have steps been taken to ensure that the enforceability mechanisms are clearly understood?
- Conflict resolution: Has a conflict resolution and escalation process been identified?
- Intervention: When and for what reasons can regulators intervene?
- **Harm management:** Are there internal responsibility procedures in place to address any unintended harm caused by the design, development, or deployment of AI?
- External oversight: Are there any internal or external monitoring, auditing, or oversight
 procedures for evaluating the use of Al and assessing their impact on users or other
 individuals or groups?
- Human oversight: Is there continuous and effective human oversight over decisions made based on Al findings?
- Accessibility: Is information relating to obtaining an effective remedy clear, easily understood, and accessible?
- Contestability: Are there options for people affected by a decision to learn about the output of the automated system and to challenge predictions, recommendations, or decisions influenced by the system?
- Recourse: Is there any recourse available for any harm caused by Al during the decisionmaking process, such as complaints or appeal procedures?
- Reversibility: Is the harm of a wrong decision by the Al system fully reversible?

Constructiveness

police/groups that assess police use of Al always have a constructive attitude in their negotiations with each other

- **Mechanisms and safeguards:** What are the mechanisms to safeguard Constructiveness in discussions and negotiations?
- Risk management: Has this principle's specific risk(s) been added to the risk register?
- **Communication:** How is communication managed internally and externally to ensure this principle does not dilute accountability and transparency?
- Disconnect: How to handle actors that fail to adhere to a basic foundation of Constructiveness?
- Engagement: Has an independent spokesperson been chosen who can talk about the most important questions of accountability that come up at each stage of the project?

Compellability

it is possible to compel police to provide access to all necessary information, systems or individuals to judge their use of Al

- Oversight capacity: The oversight body's role and authority, functions and powers should be determined
- Oversight powers: On what grounds can oversight bodies interrupt, interrogate, or compel LEAs or programme partners, either directly or via national bodies such as regulators?
- Requirements: What process is in place to clarify and explain what is required in respect of information and access?
- Information security: Have legal and industry-specific obligations for information security been met?
- **Security and safeguards:** What security measures and other safeguards are in place in respect of the provision of information?
- **Notification:** What methods are used to tell LEAs about compellability and carry out actions related to it?
- **Non-compliance:** Have the sanctions or consequences of noncompliance been clearly communicated?

Explainability

all AI practices, systems and decisions can be fully explained to the public and oversight bodies

- Scope of application: Explainability is relevant for which aspects of Al or Al usage?
- Fulfilment: How to determine whether Explainability has been satisfied? Who judges whether Explainability has been satisfied?
- Communication strategies: Are clear communication strategies in place that account for the different needs of individuals and groups?
- Risks and consequences: Is there a clear understanding of the significant risks and consequences of not complying with this principle?
- Effectiveness: How is the effectiveness of this principle measured?
- Review mechanism: Have mechanisms to facilitate reviews, challenges, and complaints been established?

Learning Organisation

police are continually willing to change their current Al practices based on new knowledge and insights

- Understanding: How do security practitioners learn about or are informed about aspects that need to be adapted?
- Stakeholders: Is learning only needed for security practitioners, or are other groups equally required to make adjustments?
- Knowledge management: How is learning codified to ensure it remains available, replicable, and can spread within the organisation and/or sector?
- **Resource availability:** Are there sufficient resources in place to enable and sustain the learning?
- Evaluation: Are there sufficient resources in place to enable and sustain the Learning?



- Application of law: How do the applicable laws apply in this context?
- Necessity and proportionality: Are the overriding principles of necessity and proportionality complied with?
- Legislative gaps: Are there aspects of Al usage, including new developments and capabilities, that
 are not regulated by existing standards?
- Demonstration of compliance: How can compliance be demonstrated?
- Quality assurance: What quality assurance and bias mitigation processes do you have in place for the data lifecycle - for both acquired and collected data?
- The data provider and purpose: Will any data being used in the production of the Al system be acquired from a vendor or re-purposed from existing datasets?
- Residual risks: Despite legal compliance, are any residual risks particular to Al addressed?
- Exemptions and safeguards: Do any legal exemptions apply? If so, are appropriate safeguards in place?
- Privacy harm: Does the use of AI deal with special categories of personal data as defined by applicable legal norms?
- Objective oversight: Is the appropriate oversight body engaged in the activity?
- Equality: Should an equality impact assessment (EIA) be conducted, considering impacts on affected individuals?
- Public concerns: Apart from legal compliance, are there wider public concerns that need to be addressed?

Coffee Break 15 min





INNOVATION LAB





Review of discussions +

Outlook for AP4AI

Outlook for AP4AI and next steps

- Extension of use cases and application scenarios (AI deployment) <u>including additional</u> <u>use cases identified in this session</u> in collaboration with Starlight project (H2020, #101021797)
- Further validation and instantiation of the Al Accountability Agreement using examples and challenges from internal security practitioners
- Further development of the software application as a supporting mechanism for the implementation of AP4AI



Accountability Principles for Al ap4ai.eu

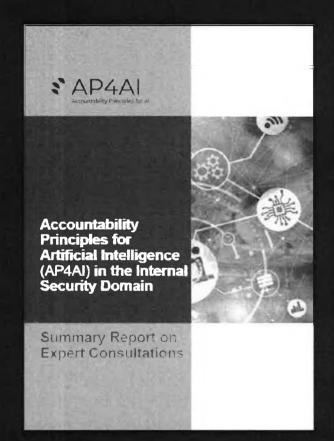


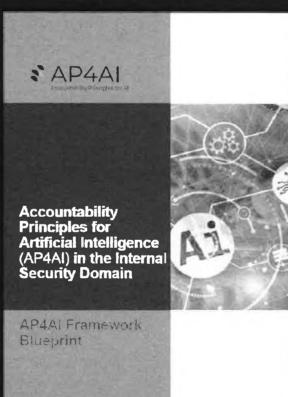
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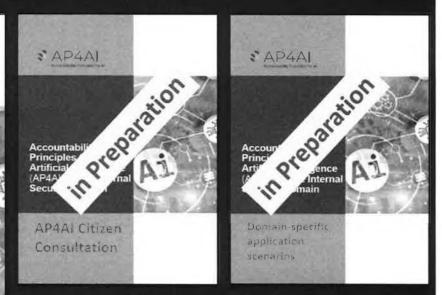


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