

DMPC Decision – PCD 1595

Title: Law Enforcement Data Service (LEDS) Grant Funding Regularisation

Executive Summary:

This paper seeks approval to accept LEDS grant allocation of £739,000 from the Home Office (HO) to fund the adoption of a National Identification Access Management (NIAM) system as well as implementing business change activities within the Metropolitan Police Service (MPS).

Recommendation:

The Deputy Mayor for Policing and Crime is recommended to:

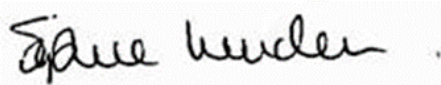
1. Approve the request to accept the LEDS grant of £739,000 from the HO to fund the LEDS adoption and implementation activity.
2. Approve the request to accept future HO grant funding to fund the NIAM systems project and LEDS implementation project until Police National Computer (PNC) is decommissioned.

Deputy Mayor for Policing and Crime.

I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct. Any such interests are recorded below.

The above request has my approval.

Signature



Date 19/01/2024

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC.

1. Introduction and background.

- 1.1. Information is the lifeblood of policing. Protecting the public from threat, harm and risk depends on making the most of the data available to enable intelligence-led preventative policing and investigation, while continuing to meet public expectations regarding data management.
- 1.2. The HO is leading a wider programme that includes the implementation of Law Enforcement Data Service (LEDS) in the MPS to replace the Police National Computer (PNC), which has been in use by police services since the 1970s.
- 1.3. The PNC is over 40 years old, the skills and knowledge required to manage it are becoming increasingly limited. Due to the scale and complexity of adopting such a critical piece of policing IT infrastructure, along with the associated business transformation requirements, the HO is offering grant funding to partially offset the associated expenses for each force.
- 1.4. The Grant scheme will provide £9m in 2023/24 to England and Wales Police Forces under Section 57(1) of Policing Act 1996 and non-HO forces with jurisdiction in England, Scotland and Wales under Section 169 Criminal Justice and Public Order Act 1994, for expenditure incurred from the changes made to support the National Law Enforcement Data Programme (NLEDP) roadmap.
- 1.5. The NLEDP roadmap aims to deliver LEDS and remove the dependency on PNC by 2025. Police Forces will have to undertake substantial business changes to adopt LEDS and remove their dependency on PNC.

2. Issues for consideration.

- 2.1. The current tools at the disposal of PNC users are outdated and unable to adapt to new and changing priorities. Therefore, there is a significant risk of data loss, disruptions, and security vulnerabilities.
- 2.2. The wider programme will deliver an enhanced law enforcement data service that will be at the heart of protecting Londoners for years to come. The funding is to be used for the National Identity Access Management (NIAM), discovery work and project management.
- 2.3. The MPS state that "the HO may decide not to award the MPS any additional funding, instead directing the funding to other forces that will make better use of the funding allocated to them" if the grant funding allocated is not used effectively throughout the financial year. As a result, this will impact the ability to deliver LEDS at pace, due to the requirement to identify and allocate appropriate budget.
- 2.4. Therefore, the MPS will be forced to depend on a fragile PNC. This will affect how the national programme is delivered, increase maintenance costs for the PNC, increase the

risks of an outage, and ultimately affect performance if the MPS fails to make use of the new functionality.

- 2.5. The HO expects all police forces to have completed transition on to LEDS by the end of December 2024, with the decommissioning of PNC in 2026. There are substantial business change activities required in force, changing from an outdated system to a much more modern interface. This will result in a training requirement for the MPS but will also present opportunities to provide much wider access to Law Enforcement data due to the intuitive nature of the products delivered
- 2.6. The MPS assure that officers will be trained to ensure they comply with current legislation. Current testing in forces demonstrates existing PNC users have found the transition much easier than expected, although some users in call handling environments may find it more challenging.

3. Financial Comments.

- 3.1. The proposal is to accept a grant of £739,000 for 2023–2024 as well as accepting future grant funding in principle to support the LEDS implementation project and the NIAM systems project until the PNC is decommissioned.
- 3.2. The LEDS grant will be claimed against the NIAM systems project, LEDS discovery project and LEDS implementation project.
- 3.3. Improving the systems, the MPS uses, and the data provided by such systems will assist the MPS in their duty to support the aims of the London Anchor Institutions' Charter.

4. Legal Comments.

- 4.1. MOPAC acceptance of this Grant is permitted under Schedule 3 Paragraph 7 of the Police Reform and Social Responsibility Act 2011, whereby MOPAC may do anything which is calculated to facilitate, or is conducive or incidental to, the exercise of the functions of the Office which includes entering into contracts and other agreements (whether legally binding or not).
- 4.2. Paragraph 4.8 of the MOPAC Scheme of Delegation and Consent provides that the Deputy Mayor for Policing and Crime (DMPC) has delegated authority to approve all bids for grant funding made and all offers made of grant funding.
- 4.3. MPS assures that the grant funding can be accepted after consulting with the Directorate of Legal Services.

5. GDPR and Data Privacy.

- 5.1. The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.
- 5.2. Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.
- 5.3. The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.
- 5.4. Data Protection Impact Assessment (DPIA) has been completed by the HO programme team. Whilst it is recognised that the MPS project will require a separate DPIA in the future, this has not yet been completed. Consultation is ongoing between colleagues within Data, Digital and Technology (DDaT) and colleagues from the Home Office. The project will ensure privacy by design approach, which will allow the MPS to find and fix problems at the early stages of any project, ensuring compliance with GDPR.

6. Equality Comments

- 6.1. This business case has undergone an initial equality screening. Due regard has been taken to the Equality Act's Public Sector Equality Duty. Real consideration has been taken to assess the equality impact caused by the proposed business changes. As a result, no positive or negative impact has been identified to any individual and/or group safeguarded by a protected characteristic and those who are not

7. Background/supporting papers.

7.1.MPS Report Law Enforcement Data Service (LEDS) Grant Funding Regularisation.

Public access to information:

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOIA) and will be made available on the MOPAC MPS website following approval.

If immediate publication risks compromising the implementation of the decision, it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If yes, for what reason:

Until what date:

Part 2 Confidentiality: Only the facts or advice considered as likely to be exempt from disclosure under the FOIA should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a **Part 2** form –No.

ORIGINATING OFFICER DECLARATION		<i>Tick to confirm statement (✓)</i>
Financial Advice: The Strategic Finance and Resource Management Team has been consulted on this proposal.		✓
Legal Advice: The MPS legal team has been consulted on the proposal.		✓
Equalities Advice: Equality and diversity issues are covered in the body of the report.		✓
Commercial Issues: The proposal is in keeping with the GLA Group Responsible Procurement Policy.		✓
GDPR/Data Privacy <ul style="list-style-type: none">GDPR compliance issues are covered in the body of the report.		✓
Drafting Officer Stephen Kalyango has drafted this report in accordance with MOPAC procedures.		✓
Director/Head of Service: The Interim Chief Finance Officer and the Director of Corporate Services has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.		✓

Chief Executive Officer

I have been consulted about the proposal and confirm that financial, legal and equalities advice have been taken into account in the preparation of this report. I am satisfied that this is an appropriate request to be submitted to the Deputy Mayor for Policing and Crime.

Signature



Date. 15/01/2024

