



Law Enforcement Data Service (LEDS) Grant Funding Regularisation

MOPAC Investment Advisory & Monitoring meeting 10th January 2024

Report by Richard Cullen on behalf of the Chief People and Resources Officer

Part 1 – This section of the report will be published by MOPAC. It is classified as OFFICIAL – PUBLIC

EXECUTIVE SUMMARY

This paper seeks to secure approval to accept the Home Office LEDS grant allocation for the LEDS adoption and implementation activity. This will involve the implementation of a National Identification Access Management (NIAM) system as well as implementing associated business change activities across the MPS.

The Law Enforcement Data Service (LEDS) is to replace the Police National Computer (PNC), which has been in use by police services since the 1970s. PNC is over 40 years old, the skills and knowledge required to manage it are becoming increasingly limited. Security vulnerability, outages and data losses resulting from this are a significant risk. The current tools at the disposal of PNC users are outdated and unable to adapt to new and changing priorities.

LEDS is being delivered in the MPS as part of a wider programme led by the Home Office. In recognition of the scale and complexity of the adoption of such a critical piece of policing IT infrastructure, and the associated business change requirements, grant funding is available through the Home Office to offset some of the associated costs for each force.

Due to the nature of the grant funding offered, ExCo and MOPAC authority must be sought in order to accept such funding.

Recommendations

The Deputy Mayor for Policing and Crime, via the Investment Advisory and Monitoring meeting (IAM), is asked to:

1. Grant approval for the MPS to accept the LEDS grant of £0.739m from the Home Office. The grant will be claimed against the NIAM systems project, LEDS discovery project and LEDS implementation project.
2. Grant approval to accept future Home Office grant funding provision to support the NIAM systems project and LEDS Implementation project until PNC is decommissioned.

Time sensitivity

A decision is required from the Deputy Mayor by 26th January 2024. This is because there are national programme deadlines stipulating that grant funding must be applied for retrospectively in accordance with their schedule. Should funding not be applied for in a timely manner, it will be reallocated to other Home Office priorities, and future grant funding may be affected.

Non-confidential facts and advice to the Deputy Mayor for Policing and Crime

1. Introduction and background

- a) 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. The wider programme is delivering an enhanced law enforcement data service that will be at the heart of protecting Londoners for years to come.
- b) Adoption of LEDS requires the MPS to undertake substantial technical changes to internal systems, which are not part of our planned change schedule putting pressure on our already stretched budgets and resource. The Home Office 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. Officers will require training 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.

2. Issues for consideration

- a) Should the MPS not utilise the allocated grant funding effectively over the course of this fiscal year, it is likely that the Home Office/HM Treasury could take the decision to not award the MPS any additional funding, instead directing this funding to other forces who have made better use of the monies allocated to them.
- b) As a result, this will impact on the ability to deliver LEDS at pace, due to the requirement to identify and allocate appropriate budget.
- c) This, in turn, will leave the MPS no option but to continue to rely on an increasingly fragile PNC. This will impact on the delivery of the national programme, increase costs to the MPS to sustain PNC, risks of outage and

ultimately an impact on performance as the MPS doesn't utilise the new functionality.

- d) The impact of Drop 2 of CONNECT on the organisation will be significant and widely felt. The LEDS Implementation project recognises that it would be unwise to attempt to deliver LEDS at pace during this period, due to organisational/user capacity to take change on board. This will therefore lengthen the period in which LEDS will be delivered more widely across the organisation and therefore closer to the Home Office deadline.
- e) During LEDS associated discovery work, Digital, Data & Technology have invested heavily in a critical enabling work that is vital to the success of LEDS adoption and implementation. This enabling work is the implementation of the National Identification Access Management (NIAM/IAM).
- f) Under the National Enabling Program (NEP), the Home Office has set a new IAM strategy for all police forces to adhere to. IAM will play a vital role in how officers gain access to future national policing applications, i.e. LEDS.
- g) IAM enables user access and assigns the correct permissions (based on officer profiles), and these details are automatically fed into the national solutions, resulting in officers/staff being able to access systems at a level commensurate with their role/requirements.
- h) The SailPoint product was mandated by the NPCC for use across all forces to achieve effective governance for identity management with automation to control accounts when people join, move, and leave the organisation.
- i) The NIAM project was subject to its own approved business case and DDaT (Digital Data and Technology) allocated funding. Whilst any monies retrieved through Home Office grant funding will offset this expenditure, it will also be reinvested in critical LEDS related functions, namely project management and business change resourcing.

3. Contributes to the MOPAC Police & Crime Plan 2022-25¹

- a) Access to data is of critical importance when conducting policing activity. Currently, the PNC is utilised by a significant number of officers and staff on an almost daily basis, if not multiple times during a shift.² This will only continue as LEDS is developed and we transition to the use of this system. The information contained within these databases aids the assessment of risk and allows for effective safeguarding and risk mitigation measures to be implemented. Without access to the data provided within these databases, the ability to protect people from exploitation and harm, and reduce and prevent violence would be severely hampered. In turn, this would rightly detrimentally affect public confidence.

¹ [Police and crime plan: a safer city for all Londoners | London City Hall](#)

² The MPS undertakes circa 30 million PNC transactions per year

4. Financial, Commercial and Procurement Comments

- a) The Grant scheme will provide £9m for FY 2023/24 to England and Wales Police Forces under Section 57(1) of Policing Act 1996 and non-Home Office 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. The NLEDP roadmap looks to deliver LEDS and remove the dependency on PNC by 2025. Police Forces will need to undertake substantial business changes to adopt LEDS and remove their dependency on PNC.
- b) The LEDS grant will be claimed against the NIAM systems project, LEDS discovery project and LEDS implementation project.
- c) The expected future cost of implementing LEDS will be greater than the costs stated here but will not be known until our Project Manager (expected to enter the organisation in January 2024) has fully scoped and set out the full cost of the entire project. This will be the subject of a future ExCo business case.

Project Revenue	2023/24 £m	2024/25 £m	2025/26 £m	2026/27 £m	2027/28 £m	Total £m
Budget	0.128		0.000	0.000	0.000	0.128
Planned spend						0.000
National Identity Access Management [NIAM] Sailpoint	0.474					0.474
LEDS Discovery	0.325					0.325
LEDS Implementation Project Management	0.068					0.068
Planned Spend	0.867	0.000	0.000	0.000	0.000	0.867
LEDS Home Office Grant	-0.739					-0.739
Net Spend	0.128	0.000	0.000	0.000	0.000	0.128
Variance to Budget	0.000	0.000	0.000	0.000	0.000	0.000

- d) The focus of the London Anchor Institutions' Network Charter focusses on the coming together of key partners to build a better London for everyone. Improving the systems we use, and the data provided by such systems will assist the MPS in their duty to support the aims of the Charter.

5. Legal Comments

- a) 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).
- b) 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.

- c) Through consultation with the MPS's Directorate of Legal Services, it has been established that the grant funding can be lawfully accepted. At this stage there have been no concerns expressed by the reviewing lawyer

6. Equality Comments

- a) 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 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. Privacy Comments

- a) 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.
- b) 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.
- c) The Information Assurance and Information Rights units within the MPS will be consulted at all stages to ensure the project meets its compliance requirements.
- d) A DPIA has been completed for this project by the Home Office 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 a 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. DPIAs support the accountability principle, as they will ensure the MPS complies with the requirements of GDPR and they demonstrate that appropriate measures have been taken to ensure compliance.

8. Real Estate Implications

- a) There are no real estate implications associated with the delivery of this project known at this stage.

9. Environmental Implications

- a) The MPS Environment and Sustainability team have been consulted and believe there to be no additional impacts for the organisation at this stage. This will

continually be reviewed throughout the life of the project, taking account of social value and carbon reduction plans.

10. Background/supporting papers.

- a). Law Enforcement Data Service (LEDS) Grant Funding Regularisation
- b). Report author: Rich Cullen.