

Accounting Officer Assessment: Law Enforcement Data Service Programme, October 2024

It is normal practice for Accounting Officers to scrutinise significant policy proposals or plans to start or vary major projects, and then assess whether they measure up to the standards set out in Managing Public Money (MPM) guidance. From April 2017, the Government has committed to make a summary of the key points from these assessments available to Parliament when an Accounting Officer has agreed an assessment of projects within the Government's Major Projects Portfolio (GMPP).

Background and Context

The Police National Computer (PNC) is a mission critical policing system and is one of the main sources of information used in everyday policing, such as traffic stops, arrests, domestic abuse, and criminal investigations, as well as by other law enforcement and non-law enforcement organisations across the United Kingdom.

Since 1974 PNC has been the main database of criminal records and is used by front-line officers from all police forces in the UK to understand who they are interacting with. PNC is also accessed by, or provides data to, another 127 organisations with a range of restrictions on what they can access. As a legacy system it faces a real risk of near obsolescence with an increased pressure to retain diminishing crucial expert and skilled resources to manage, maintain and decommission this fundamental element of the national critical policing infrastructure.

The National Law Enforcement Data Programme (NLEDP) was established in 2016 to replace the Police National Computer (PNC) and Police National Database (PND) with the Law Enforcement Data Service (LEDS), enhancing the ability of Law Enforcement to protect the public. Between 2016 and 2020 NLEDP faced significant challenges that impacted on progress and delivery, and the programme was subject to reviews by the Infrastructure and Projects Authority (IPA) and the National Audit Office (NAO).

Following a re-set in 2021, replacement of the PND was decoupled from NLEDP and the sole objective became the replacement of PNC. Since 2021 the LEDS programme has gone from strength to strength by adopting a product centric approach to the development and deployment of complex and critical IT services to achieve parity with PNC and to ensure business continuity whilst eliminating the reliance on PNC.

The LEDS programme is focused on the development and adoption of LEDS products to replace existing PNC capability across all police forces and other non-policing PNC consumers, enabling the retirement of by March 2026 (the point at which PNC support will expire).

The future vision is to fully exploit the LEDS investment to act as a platform for innovation to transform the management and supply of data services to Law Enforcement Communities and other authorised Agencies.

Assessment against the Accounting Officer Standards

Regularity

The investment receives business case approval from HM Treasury and adheres to compliance with Managing Public Money. The Home Office Investment Committee provides control to programme expenditure by the approval of a programme business case for each stage of development. These business cases are developed at least annually.

One of the Home Office's priority outcomes is to reduce crime. This relies upon the programme implementing LEDS products to provide a new joined-up information system to prevent crime and better safeguard the public. LEDS will replace the current functionality in PNC incrementally through the delivery of a series of LEDS products. Each product will be assured for regularity during its development. This will include identifying the legal basis and the provision of guidance for how each product should be used by UK police forces and law enforcement organisations in addition to police forces in Crown Dependencies such as Jersey, Guernsey, and Isle of Man.

The Secretary of State has broad powers under the Police Act (1996) to provide, maintain or contribute to organisations, facilities and services considered necessary or expedient for promoting the efficiency or effectiveness of the police. The term Common Services can include organisations that are not England and Wales police forces if the Home Secretary considers it necessary or expedient for the efficiency or effectiveness of policing. Both PNC and LEDS are included within the definition of Common Services.

Operational control of the data in PNC is maintained through the Police Information Access Panel (PIAP). Consistent processes are applied across PNC and LEDS both during the dual running periods and continued when PNC is retired.

Regularity Conclusion

The use of information within both PNC and LEDS is supported either by explicit legislation, or by common law duties and powers. The police also have common law powers to share information with other public bodies where it is in the public interest to do so in pursuit of the police's functions and functions of the body with whom the information is being shared. LEDS will maintain a robust audit capability to enable compliance checks with operational and legislative requirements. Where additional benefit can be gained through new legislation there is a process to identify this and to develop options, however, the project does not require new or amended legislation to progress and therefore the programme conforms to the Regularity Accounting Officer standard.

Propriety

LEDS supports the priority outcome of reducing crime critical to the Home Office's public safety mission. PNC currently provides police and law enforcement agencies with access to a centralised source of information concerning individuals, property and vehicles, gathered and used for law enforcement, policing and safeguarding purposes. This information is used for the prevention, investigation, detection and prosecution of criminal offences, the execution of criminal penalties, and for wider policing purposes, such as the safeguarding of children and vulnerable adults and the protection of property. PNC is the single most important national policing system in the UK.

LEDS is relocating the multiple existing data sets currently maintained within PNC into a new technology platform. This will better ensure that officers are able to use information to detect and prevent crime and safeguard the public while continuing to adhere to the requirements of the data protection legislation. The development work on LEDS will, in due course, result in the decommissioning of PNC, with an expected net saving in operational costs. It is therefore in the public interest for this programme to be successfully delivered. Resources to deliver the capability are in place or are being recruited. These plans and the regularly updated business case are scrutinised through the Home Office Investment Committee process, through the LEDS Programme Board, and by HM Treasury and through stakeholder governance. This is a complex programme assessed as of September 2024 by the Infrastructure and Projects Authority (IPA) as being a sound delivery which is reflective of the significant scale and complexity of LEDS Programme.

The senior stakeholders needed for successful outcomes are intimately involved in the delivery. A broad spectrum of organisations are involved in the scrutiny of the LEDS delivery outcomes. Key documentation will also be published on gov.uk to aid transparency and accountability.

LEDS will incrementally replace PNC with a series of products. Each product is assessed during its development phase against ethical themes under the Data Ethics Framework which assesses the proportionality of the use of data through each product. The assessment will take a risk-based approach, with a broad spectrum of internal (Home Office) and policing scrutiny during the development of each product. The Police along with Home Office Teams (including the Data Protection Officer) will assure data protection risks and the Police Information Access Panel will ultimately approve the product designs from a data protection perspective. This assessment will also ensure the legality of each product being developed by the programme. A Parliamentary Code of Practice for LEDS is in place and a supporting training package was developed with the College of Policing to guide the behaviours whilst using, managing, and governing LEDS.

A key element of the propriety standard is whether any proposal is sustainable including whether sufficient public resources are available and are likely to continue to be available. The programme's continued funding will be secured through the continued successful demonstration of delivery. Detailed discussions are ongoing to ensure that activities and costs of decommissioning PNC are fully planned and achieved.

Propriety Conclusion

In summary, the proposal supports a significant proportion of the Department's Priority outcomes, the affordability considerations are known, clear and well managed. The legal risks are surfaced through an extensive process and signed off at an appropriate level. The stakeholder involvement is significant, ensuring the capabilities are delivered to standard. The Information Commissioner's Office is kept informed about the development of LEDS and about significant issues as they arise. I therefore consider the programme to align with the principles documented in Managing Public Money and to conform to the Propriety Accounting Officer standard.

Value for Money (VfM)

The business case is prepared in line with Green Book best practice, considering costs, benefits, risk, and uncertainty. The Economic Case has a positive Net Present Social Value and concluded that the preferred way forward represents value for money and is recommended as the preferred option.

Benefits

Benefits from efficiency savings, cost savings and outcome improvements for public and private sector stakeholders have been identified and appraised over a 12-year appraisal period from FY2021/22 to FY2035/36. A benefits-tracking framework and realisation plan has been established to monitor all programme benefits. Key benefits that will be delivered by LEDS include:

- Improved safeguarding of missing persons.
- Efficiency of missing persons investigations.
- Reduced inefficiency from PNC outages.
- Reduced time to train new users.

Net Present Social Value (NPSV)

PNC is a critical national infrastructure that is reaching the end of its life and needs replacing. A Do-minimum investment is used as the baseline. This is modelled as the lowest reasonable cost to keep PNC running until 2036. It meets the minimum requirements of the service from an operational, but not from a security, perspective. However, the Do-minimum option offers no benefits whereas there are significant benefits to the preferred option. The key measures of Value for Money are those that are relative to the baseline (RTB).

The central estimate for the preferred option of benefits is **£329.3 million (PV)**. This gives a NPSV RTB for the preferred option of **£101.1 million (PV)** over 12 years.

Alongside this positive NPSV, consideration should be given to non-monetised factors. Unlike the baseline option, the preferred option aims to deliver system functions that minimise or remove legal compliance risks. Additional non-monetised benefits include opportunities to improve societal outcomes through broader use of driver images and broader access to PNC.

Risk

Costed risk has been included, where relevant, to provide a more informative assessment of the risk to value for money and affordability. Optimism Bias has also been applied as per HM Treasury Green Book (2022).

Impairment

After successfully exiting the reset in July 2021, a review was undertaken of capital expenditure incurred to the end of FY2020/21 to identify elements that can be reused and those that cannot, resulting in an impairment of approximately £75m being recognised in FY2021/22. The NPSV analysis assumes all LEDS capital is fully impaired by the end of the appraisal period (2035/36), therefore this £75m financial impairment has no additional impact on the value for money assessment.

Value for money conclusion

Taking into account the above information, I consider that the programme direction and programme business case do conform to the Value for Money Accounting Officer standard.

Feasibility

The current key support contracts for PNC service expire 31st March 2026. Delivery confidence to retire PNC by March 2026 at this point, based on development and adoption progress to date remains high. This is supported by two recent IPA reviews which highlighted a high level of confidence in LEDS delivery, but noted continued complexity and risk associated with the development and adoption of this critical national infrastructure. Despite our high delivery confidence, it is imperative that LEDS has an adequate contingency plan in place to support continuity of critical national infrastructure. Commercials are exploring contingency options for extending PNC support contracts. Critical success factors are in place and will feed into a programme decision point and taken through formal governance. The programme works closely with policing colleagues who are embedded into key programme leadership roles, which is helping to drive effective decision making and ensure products are developed with a user focus, delivering on policing requirements. This also helps to ensure that the views of policing are represented at all levels and supports adoption of the new products.

The programme has successfully delivered five of the new LEDS products to a significant number of users across all police forces. This successful delivery of LEDS products and growing adoption rate has built a high level of confidence (and expectation) in the programme. However, the remaining phase of the programme is acknowledged to be the most complex and challenging in that the Person product accounts for circa. 44% of current PNC transactions and the scale of external integrations is a significant workload; all against a fixed end date to avoid an extension to PNC support contracts.

The adoption of LEDS products by police forces and other organisations is being carried out by a dedicated team backed by specific funds to enable those organisations to conduct the necessary business change in preparation for adopting LEDS products.

The delivery strategy is sound and evidenced by the delivery of the new LEDS products to a significant number of users across all police forces. With ¹51 Organisations are now connected to LEDS via the National Identity Access Management (NIAM) service, including all 43 geographical police forces of England and Wales, Police Scotland, National Crime Agency (NCA), ACRO, British Transport Police (BTP), Civil Nuclear Constabulary (CNC) and Jersey Police. 50 of those are consuming at least 1 LEDS product, with 45 consuming all relevant LEDS products.

Over recent months, LEDS has achieved key critical milestones, including, firstly Property Cutover, this is a hugely significant milestone for LEDS as it is the first step in decoupling and reducing our reliance on PNC system. This deployment also showcases significant maturity of test, assurance and service readiness for operating and supporting critical national infrastructure (support also incorporating the wider NLEDP ecosystem and DVLA). The second, was the complex deployment of LEDS Person Release 1, which is the first stage of deployment of the programme's last, but largest and most complex product. This release enables users to search through most of the Person data via LEDS, that is also available on PNC. Thirdly, LEDS has now enabled Two Way Replication capability, enabling Pioneer users with the functionality to create, amend and delete records in LEDS and prove that this is fully synchronised with the PNC.

The Metropolitan Police Service (MPS) and NCA have both onboarded their first LEDS users in May and July 2024 respectively, with Police Service of Northern Ireland (PSNI) advancing their adoption journey well in August 2024. The first non-police force organisations (NPOs) onboarding LEDS are anticipated to be Border Force Intelligence and Gangmasters & Labour Abuse Authority. LEDS has achieved its first step in decoupling and reducing our reliance on the legacy system, with the deployment of the Property product showcasing a significant maturity of test, assurance and service readiness. This successful delivery of LEDS products and

¹ Data is accurate at the time of writing November 2024.

growing adoption rate has built a high level of confidence and expectation in the programme.

Resourcing the programme with the right quality and quantity of skilled individuals via both civil service and contingent labour routes has been a challenge for the programme. The programme has undertaken a forensic review into the lengthy resourcing process (from identification and confirmation of resource requirements) to identify and address issues. The programme has also reprofiled resourcing based on the maturing roadmap for delivery and its approach is to proactively plan for when critical resources are needed, and the time taken to onboard.

The programme continues to follow best practice and has been through a number of reviews including IPA Gate Reviews, and continue to work closely with IPA, who also attend the LEDS Programme Boards. Since the IPA review in February 2023 all recommendations have been implemented and closed. The recent IPA reviews held (April 2024 IPA Gate 0 review and September 2024 IPA Gate 3 review) were both positive and were confident in the delivery given the programme's scale and complexity. The recommendations from the September 2024 review (around resourcing, governance, long-term funding, and assurance of IT transformation delivery) are being addressed. The IPA Review Team noted, since the Gate 0 Review in April 2024, the Law Enforcement Data Services (LEDS) programme has continued to go from strength to strength. Feedback from police stakeholders (from the front line to the Chair of the Police Chiefs Council) is very positive and there is a tangible desire for the new LEDS services from the users.

Feasibility Conclusion

Delivery confidence has significantly improved since the 2021 reset, with the move to a product centric, agile development approach, the strengthening of the leadership team, and the successful product deployments and adoption. However, this programme remains large, complex and high risk. As the programme progresses through further phases of design and development the complexity and risk continue to pose a risk to plan and budget, this is fully recognised and being managed.

With this in mind, and based on the latest IPA review, and Investment Committee scrutiny for the business cases, I consider the programme to meet the Feasibility Accounting Officer standard but will continue to monitor this closely.

Conclusion

As the Accounting Officer for the Home Office, I have considered and approved this assessment of Law Enforcement Data Service Programme which conforms to the four Accounting Officer standards of Regularity, Propriety, Value for Money, and Feasibility.

I have prepared this document to set out the key points which informed my decision. If any of these factors change materially during the lifetime of this project, I undertake to prepare a revised version, setting out my assessment of them.

This document will be published on the government's website (GOV.UK). Copies will be deposited in the Library of the House of Commons, and sent to the Comptroller and Auditor General, Treasury Officer of Accounts and Chair of the Public Accounts Committee.

Sir Matthew Rycroft KCMG CBE
Home Office, Permanent Secretary

5 December 2024