

National Law Enforcement Data Programme:

For Information Document: Data
Cleansing Activity

15 January 2019

This Document has been written with the aim of providing an update on the current status of the National Law Enforcement Data Programme. It is to be circulated to members of the LEDS Open Space for information.

NLEDP - Non Paper

1. This paper has been written to provide notification about the possibility of using a substantially new data type to cleanse data within LEADS.

Summary

2. The National Law Enforcement Data Programme (NLEDP) is seeking to use death registration to reduce the possibility of inappropriate law enforcement action from continuing against people who have died. NLEDP will not use the GRO death registration data for any other purpose and will delete the data once the cleansing activities have taken place.

Context

3. The National Law Enforcement Data Programme (NLEDP) is a Home Office Programme creating the Law Enforcement Data Service (LEADS) to replace the Police National Computer (PNC). LEADS will provide information on criminals, suspects, witnesses, and victims of crime in support of UK law enforcement.
4. The vision of the NLEDP is to work to provide Law Enforcement and other agencies, on-demand and at the point of need, with current and joined up information in order to prevent crime and better safeguard the public. As such, LEADS will be accessed by police forces and by a diverse range of law enforcement organisations including the National Crime Agency, Her Majesty's Revenue and Customs and the Gangmasters and Labour Abuse Authority. LEADS will also be accessed by a select number of private sector organisations that have aims that are in complementary to law enforcement.
5. Information in relation to ongoing investigations and convictions remains on the Police National Computer for several years. It is not uncommon for law enforcement action to be commenced against individuals who have died. This can be extremely distressing for the friends and family of the deceased, embarrassing for the officers involved and reduces confidence in law enforcement handling of information.
6. The fact of the intended use of GRO Death Registration Data to improve the data quality within PNC or LEADS will be made public. Although the Death Registration Data is not Personal Data equivalent protections will apply. It is intended that a summary of those protections will be compiled into the annual Data Protection Impact Assessment (DPIA). This DPIA will better enable the full context to be explained without reviling operational detail.

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Assessment

7. The information requested relates to the death registration record as retained by the General Register Office. Guidance from the Information Commissioner's Office informs us that information about a deceased person does not constitute personal data and therefore is not subject to the GDPR or the Data Protection Act 2018. The processing, retention and disclosure of death registration data might constitute an interference with the European Convention of Human Rights Article 8 rights of friends and family of the deceased and therefore this application has been advanced as if the data being sought was personal data. In this way we should apply appropriate levels of protection and any interferences with the privacy of the friends and relatives of the deceased from this activity will be minimised.
8. The PNC is the master version of certain information generated by local forces, law enforcement agencies, approved organisations and government departments. Private sector organisations that perform law enforcement type functions will have limited access to LEDS. These bodies can access the PNC system for specific lawful purposes and are responsible for the information that they place onto the system that is available for others to view. However, the PNC is managed and controlled by the Home Office.
9. The Home Office is seeking the death registration information to help determine whether records held on the existing PNC database (and in future on LEDS) relate to dead people. The Home Office is seeking continued access to death information so that PNC and LEDS records are kept up to date. The result of providing this information would be that a PNC or LEDS record matched to a civil registration of death would be highlighted to a Police Force for review.
10. This review would most likely result in the deletion of the record. In certain circumstances a Police Force review might result in the retention of the PNC or LEDS record even though the individual has been confirmed as dead. This might be the case, for instance, when enquiries are still ongoing for historic sexual abuse enquiries. The Home Office will monitor the deletion of the matched records and public statistics on this. This will enable the Home Office to provide a better service to law enforcement as a whole by removing details of individuals who are not relevant for law enforcement. It will also enable law enforcement to reduce law enforcement activity where an individual has already died.
11. The death registration data will be acquired from the General Register Office following an agreed Secure Data Transfer Plan. Handling of death registration

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data will be restricted to staff with appropriate security vetting. Storage, protection of and limited access to data will be described by the Security Operating Procedures (SyOps) documents defining the procedures for security, handling and disposal of data within the PNC/LEDS environment.

12. Users will **not** have access to **nor** be able to search the GRO Death Registration data in a standalone fashion. Users will only have access to PNC or LEDS in the usual way. If a PNC or LEDS record is not matched with death registration information no additional information will be displayed. If a PNC or LEDS record is matched with death registration that General Register Office record will be displayed in relation to an appropriate PNC or LEDS search. The matched record will be highlighted to the most appropriate local force to assess whether the PNC or LEDS record should be deleted.
13. Users will not have access to or be able to search the death Registration data in a standalone fashion.
14. The General Register Office records that are not matched will be deleted within 3 months.

The following data items are **not** required and will **not** be requested:

15. Name and surname or any details relating to the informant, including but not limited to the Qualification, address, or signature of the informant. The Cause of death of the deceased is not requested under this proposition. If law enforcement users require any of this data they might be able to request it on a case by case basis from the relevant register office.

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