

**POLICE AND CRIME COMMISSIONER (PCC) FOR LINCOLNSHIRE
REQUEST FOR DECISION**

REF: 014 / 2018

DATE: 28 March 2018

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| SUBJECT | REGIONAL REVIEW, RETENTION AND DISPOSAL (RRD) TEAM |
| REPORT BY | Richard Burge, Information Manager |
| CONTACT OFFICER | 01522 947100 |
| EXECUTIVE SUMMARY AND PURPOSE OF REPORT | |
| <p>This report outlines the addition of the City of London to the regional RRD team collaboration originally agreed at the Regional Chiefs and OPCC meeting on the 21st March 2017.</p> <p>The Review, Retention and Disposal (RRD) of information has been an issue for our collaborative force partners, primarily due to the diverse nature of the systems in which they hold information, along with the fact many of these systems are stand-alone and not easily connected to other information held, to provide the full picture about any Person, Object, Location or Event (P.O.L.E.). Lincolnshire however is seen as something of a national lead in this area having a fully functional and legislatively compliant RRD process using our GENIE system.</p> <p>This original paper outlining the five East Midland Force collaboration identified a solution to not only improve the data contained in the regional version of NICHE, but also that contained in other policing purpose systems from across the regional forces, this will now include the City of London. It outlined financial savings for all participating forces on the cost of completing the process in isolation, including Lincolnshire. Ensuring that all policing purpose information held within the East Midlands and the City of London is compliant to both the Management of Police Information (MoPI) and the Data Protection Act.</p> <p>The implementation of regional NICHE brings together information from six forces with the potential for this information to provide a fuller picture about any P.O.L.E. This proposal delivers a collaborative approach to RRD that not only includes the information within the regional NICHE system but also, as it progresses that contained in the participating forces other current and legacy policing purpose systems. This will be progressed via the use of Lincolnshire's GENIE system to not only complete RRD but also provide a search facility that includes ALL policing purpose information contained about an individual from across the East Midlands and City of London Forces. Not only will this provide the complete picture of ALL information, but also simplify the search process, aiding both operational policing and the sharing of information for the protection of the public to a variety of partner's agencies.</p> <p>The proposal aims to create a dedicated collaborative RRD team to identify and assess all East Midland and City of London policing purpose information to ensure it is appropriately reviewed and either retained or disposed according to legislation.</p> | |

RECOMMENDATION

That the addition of City of London Police to the Regional RRD collaboration be supported.

POLICE AND CRIME COMMISSIONER FOR LINCOLNSHIRE

I hereby approve the recommendation above, having considered the content of this report.

Signature:



Date: 28/3/18

A. NON-CONFIDENTIAL FACTS AND ADVICE TO THE PCC**A1. INTRODUCTION AND BACKGROUND**

The Soham enquiry (2003/04), highlighted weaknesses in the way forces managed police information, instigating legislation that resulted in the national guidance on the Management of Police Information (MoPI). The most important element and certainly the most challenging for forces, being the need to Review, Retain or Dispose of information (RRD).

The RRD process is necessary to ensure that information is processed fairly and lawfully, is adequate and relevant, is accurate and not kept for longer than is necessary¹. Before the introduction of the regional NICHE system, forces' compliance with regard to RRD was varied, ranging from none at all, to the nationally recognised and fully compliant Lincolnshire system and processes.

Post the publication of the MoPI guidance, there followed a series of reviews, inspections and stated cases into how the Police Service managed its information. These included the review into the criminal conduct of the late Jimmy Saville and the HMIC "Building the Picture" inspection (2015). The latter outlining various recommendations, including that:

"Chief Constables should immediately make sure that their force information records are reviewed at the end of the review period set for each information grouping, and records created when decisions are made to retain information beyond the applicable period of retention."

This along with the growing number of national directives around the need to implement a legislatively compliant RRD process means a failure to have such a process is no longer a defensible option.

The introduction of NICHE provides both opportunities and challenges; particularly as it develops to hold further policing purpose information via the General Incident Module. As a collaborative system the responsibility for the data within it is shared, each Chief Constable is a joint Data Controller for the information contained within the system and therefore its MoPI compliance, including appropriate retention or deletion.

This solution outlines a regional, cost effective and legislatively compliant solution to the RRD of information held across the East Midland and City of London forces that not only reduces risk, but also provides operational benefits. In doing so it seeks to not only complete RRD on ALL forces' policing purpose information held within the regional NICHE solution, but to progress

¹ Data Protection Act 1998 Principles 1,3,4 and 5

to include other such information still held in individual force systems, either legacy or current.

As such it will provide the following benefits:

- The RRD of information back record converted² into NICHE which has previously either not been reviewed, or which was held by individual forces about an individual that has been brought together by the regional system, altering the level of offending for which individual forces were aware. This includes historic reviews and those created on a daily basis under MoPI.
- Introduces a collaborative approach to RRD that not only determines the complete risk posed by individuals, but also ensures information is retained appropriately.
- Via the inclusion of a system developer in the BC, allows the process to be extended to other policing purpose systems, either current or legacy, that are retained by the participating forces.
- As other systems are added, makes the Lincolnshire GENIE available to all forces as a one stop search tool for all regional policing purpose information. This provides huge operational benefits and greatly assists in research time when sharing information with partner agencies and other forces.

Lincolnshire is recognised as a national lead in this area of business, having an extremely mature RRD process that meets all the requirements of MoPI and includes ALL their policing purpose systems as well as regional NICHE. It is managed by their GENIE system alongside a data matching tool, Clearcore, with both having the ability to be expanded to include other policing purpose systems held within the individual participating forces.

As the regional NICHE system is already connected to Lincolnshire's RRD process it has by default the ability to complete RRD for other forces' information held within that system, providing a much clearer picture of offending and therefore risk. Certainly it has become clear that numerous nominals were known across one or more regional forces, meaning any force completing RRD in isolation will do so potentially unaware of the information held by another force, or be duplicating the review process that will already have been completed by another regional force.

Whilst Lincolnshire's process has the ability to immediately complete RRD in regional NICHE for all forces, the large number of outstanding historic reviews³ and those generated on a daily basis mean they are unable to complete these with their current staffing levels.

To provide some context there is approx. 2.5 million nominals within regional NICHE of which 150k are MoPI grade 1 and 300k MoPI grade 2, both of which require a full review going forward. Of these totals approx. 100k have reviews

² A large amount of information (custody, occurrences, persons, addresses and vehicles) was back recorded converted from the various regional forces legacy systems into the regional NICHE system as follows: Derbyshire 2.88 Million, Nottinghamshire 2.96 million, Northamptonshire 3.00 million and Leicestershire 0.62 million.

³ The historic reviews relate to information either not previously reviewed by a force or now requiring a review as a result of information held about an individual from a variety of forces being joined together in the regional system changing their level of risk.

currently outstanding as a result of BRC and the joining of forces' information together, with a further approx. 1,100 reviews being created on a weekly basis.

This proposal resolves these issues by allowing the immediate RRD of all participating force information within the NICHE system on a daily basis, initially utilising PND to identify other relevant information not contained in NICHE. At the same time progressing with the historic reviews in a cost effective and risk assessed manner. It will also expand, via the suggested systems developer, to include all other current and legacy Policing Purpose information held by forces in their respective systems.

We therefore believe the proposed solution is the most cost effective and efficient option for the region, not only meeting the legislative and national requirements, but also providing value for money.

The proposed model greatly reduces management and supervisory costs as it will utilise the current regional Data Quality Supervisor/Team, to provide a unit that benefits from economies of scale and added resilience. The Data Quality and RRD unit will flex across both roles, which will not only reduce the number of staff initially required for the RRD role, but also creates resilience as the unit develops to become multi skilled.

A2. LINKS TO POLICE AND CRIME PLAN AND PCC'S STRATEGIES/PRIORITIES

The Lincolnshire Police and Crime Commissioner (PCC) has clearly outlined his requirement for officers to be visible and available. This business case will support this by providing an accurate and effective system that will provide the right information via one accurate and conclusive search.

It will allow informed operational decisions and timely risk assessments that ensure that the public are protected. This improved research capability and saving in time will provide East Midland and City of London officers and staff with the ability to be more aware of the potential risk a nominal may represent and will augment visibility on the streets of each participating force, offering increased reassurance to the communities.

B. FINANCIAL CONSIDERATIONS

The previous five Forces, East Midland collaboration identified a Lincolnshire contribution 12.9% to the budget with the level of future contributions reviewed annually by the Regional NICHE Management Board. This equated as follows:

| Agreed Force Split | 12.9% | 23% | 27.6% | 14.7% | 21.8% |
|---------------------------|----------------|----------------|-----------------|----------------|----------------|
| Force | LINCS | LEICS | NOTTS | NHANTS | DERBY |
| Cost | £47,896 | £85,395 | £102,474 | £54,578 | £80,941 |

The addition of the City of London sees them contribute and initial £28,312 to cover the set up costs of two FTE and the licensing and development requirements for Clearcore, then an ongoing contribution of 12.6%. This reduces the percentage contribution of Lincolnshire, whilst leaving our actual contribution at the same level,

again this to be reviewed annually by the Regional NICHE Management Board. This equates as follows:-

| | | | | | | |
|---------------------------|----------------|----------------|-----------------|----------------|----------------|----------------|
| Agreed Force Split | 11.3% | 20.1% | 24.1% | 12.9% | 19.1% | 12.6% |
| Force | LINCS | LEICS | NOTTS | NHANTS | DERBY | CoLP |
| Cost | £47,896 | £85,395 | £102,474 | £54,578 | £80,941 | £53,578 |

C. LEGAL AND HUMAN RIGHTS CONSIDERATIONS

[This should include the legal powers the PCC has for making the decision]

Joining the collaboration will require the Commissioner and Chief Constable to enter into a Collaboration Agreement made pursuant to Section 22 of the Police Act 1996.

D. PERSONNEL AND EQUALITIES ISSUES

[This should include a copy of the Equality Impact Assessment, if required]

All members of the Regional RRD Team will be employed by Lincolnshire Police who will be responsible for the initial payment of all salary costs which will be proportionately reimbursed by the Parties in accordance with the apportionment ratios set out in the Funding Principles. The day to day line management will be undertaken by the Lincolnshire IMU Manager.

E. REVIEW ARRANGEMENTS

The Collaboration can be reviewed on an annual basis, or as determined by the Police and Crime Commissioners or Chief Constables.

F. RISK MANAGEMENT

Risk management is undertaken in accordance with the terms of the collaboration through the Regional NICHE Management Board.

G. PUBLIC ACCESS TO INFORMATION

Information in this form along with any supporting material is subject to the Freedom of Information Act 2000 and other legislation. Part 1 of this form will be made available on the PCC's website within one working day of approval. However, if release by that date would compromise the implementation of the decision being approved, publication may be deferred. An explanation for any deferment must be provided below, together with a date for publication.

Is the publication of this form to be deferred? No

If Yes, for what reason:

Until what date:





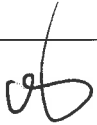
Any facts/advice/recommendations that should not be made automatically available on request should not be included in Part 1 but instead on the separate part 2 form.

Is there a part 2 form? Yes

If Yes, for what reason:

The establishment of a Regional Data Quality Team is subject to a Collaboration Agreement pursuant to Section 22A of the Police Act 1996 as amended by the Police Reform and Social Responsibility Act 2011 (PRSRA).

DECLARATIONS

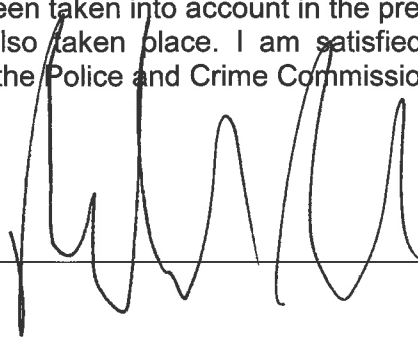
| | Initial to confirm |
|---|---|
| Originating Officer: [Richard Burge] recommends this proposal for the reasons outlined above |  |
| The CC's Chief Finance Officer has been consulted on this proposal |  |
| The Chief Constable has been consulted on this proposal |  |
| The PCC's Chief Finance Officer has been consulted on this proposal |  |
| The PCC's Monitoring Officer has been consulted on this proposal |  |

OFFICER APPROVAL

Chief Executive

I have been consulted about the proposal and confirm that financial, legal and equalities advice has been taken into account in the preparation of this report. Consultation outlined above has also taken place. I am satisfied that this is an appropriate request to be submitted to the Police and Crime Commissioner for Lincolnshire.

Signature:

A handwritten signature in black ink, consisting of several loops and a long vertical stroke at the end.

Date:

27/3/18