


LEDS OPEN SPACE ACTION LOG – 11/07/2019 v2.2.16  
Ongoing Actions 11/07/2019


Audit and Inspection		
Code of Practice and training		
Data Sharing		
Data Quality		
Governance		
Open Space Process		
Design		
Papers and Information Updates		
HOB		
Custody Images		
National Register of Missing Persons		

#	Actions	Deadline	Status	When from?	Owner?
16	HO committed to providing provocation paper on data sharing in LEDS, including but not limited to the types of data shared and sharing of data with 3rd parties.	Oct'19	<p>Ongoing. Substantive discussion on data sharing and Example of Data Sharing Agreement and Paper will be produced for May'19. Update by 09 April</p> <p>Paper not yet started – recruitment of team member to take forward this paper has been completed and paper to be provided in Jun.</p> <p><b>Update – team members recruited and tasked with writing paper to be shared in June.</b></p> <p><b>First draft has been completed and a final version will be circulated ahead of the July Open Space. A further paper towards the end of this year will include further details on what data organisations share and onward sharing of that data.</b></p>	Jul'18	

17	Further conversations needed on data sharing and data input to LEDS from external sources.	Oct'19	<p>Ongoing. Substantive discussion on data sharing and Example of Data Sharing Agreement and Paper will be produced for May'19. Update by 09 April</p> <p>Paper not yet started – recruitment of team member to take forward this paper has been completed and paper to be provided in Jun.</p> <p>Update – team members recruited and tasked with establishing a session in July.</p> <p><b>First draft has been completed and a final version will be circulated ahead of the July Open Space. A further paper towards the end of this year will include further details on what data organisations provide.</b></p> <p><b>Pick up Action 40</b></p>	Oct'18	████████
18	Discussion needed in data sharing conversation on how data is shared, if standards for data quality can be enforced on data from external sources & how this data could get on LEDS.	Sep'19	<p>Ongoing. Substantive discussion on data sharing and Example of Data Sharing Agreement and Paper will be produced for May'19. Update by 09 April</p> <p>Paper not yet started – recruitment of team member to take forward this paper has been completed and paper to be provided in Jun.</p> <p>Update – team members recruited and tasked with establishing a session in July and talking to ██████████ ██████████ on Data Quality in relation to external data systems.</p>	Oct'18	████████

			<b>First draft has been completed and a final version will be circulated ahead of the July Open Space. The data quality aspects of external systems will be picked up in the Code of Practice under the direction of [REDACTED] [REDACTED].</b>		
20	Review missing commitment re. inputting data.	Oct'19	<p>Ongoing.</p> <p>Following the Data Quality update in WS2. HO to provide substantive update on data quality failures by omission of data</p> <p>Update -</p> <ul style="list-style-type: none"> <li>• The Data Quality Dashboard is live in 23 forces with the remaining forces scheduled over the coming 3 months.</li> <li>• The dashboard will be run quarterly.</li> <li>• We are working with the HMICFRS to use the results of the dashboard within the existing PEEL inspection regime. Specifics are currently being working through. This will support accountability for data at a force level.</li> <li>• As we can provide each force with the URNs of the data that has failed, they are able to target any data improvements based on the information we provide. This is forming the basis of comms plans internally to promote the value of data and individual responsibilities for the quality of what is input.</li> <li>• Forces are also able to identify patterns of behaviour and support has been given to understand the root causes of DQ issues. Forces are considering technical and cultural options to improve the quality of data at the point of creation. For example – using a gazetteer to enhance the accuracy and completeness of address data.</li> <li>• The HO has also developed a Data Quality Maturity Model which allows a force to understand how mature they are – this has been used by forces to form the</li> </ul>	Oct'18	[REDACTED]

			<p>basis of their Information Management Strategy and supports a more proportionate approach to the management and use of police data.</p> <p>Update</p> <p><b>The HO has also developed a Data Quality Maturity Model which allows a force to understand how mature they are – this has been used by forces to form the basis of their Information Management Strategy and supports a more proportionate approach to the management and use of police data</b></p> <p><b>Following the Data Quality update in WS2. HO to provide substantive update on data quality failures by omission of data</b></p>		
21	HO to share prioritised list of operational impact assessments for new LEDS data sets and capabilities.	Jul'19	<p>Ongoing. Re-planning nearly complete however this will not be signed off until March 2019.</p> <p>Following the completion of the re planning exercise in Jan 2019. The HO will share prioritised operational impact assessments for new capabilities.</p> <p>LEDS business services being defined and prioritised. New Data sets are significantly more limited than previously identified. New data sets will be communicated to this group in advance of take on. Links to action 24 and 40.</p> <p><b>Update - planned new data sets General Register Office Death Registration Data and National Register of Missing Persons.</b></p> <p>██████████ preparing paper on new capabilities to which will be added the operational case for it.</p>	Jul'18	██████████

26	HO to provide explanation of how decision is made as to what data is kept/isn't and what the process is.	Oct'19	<p>Ongoing. Subject to Retention project and custody image review.</p> <p>Within the operational environment decisions are taken to save and delete data. HO to provide an update paper for information.</p> <p>Update – a draft Principle for LEDS will be that Data <u>will</u> be deleted <u>unless</u> there is a reason to retain rather than data being retained unless there is a reason to retain. Better alignment to 5<sup>th</sup> DP principle. Once approved new guidelines will be based upon this principle.</p> <ul style="list-style-type: none"> <li>• The PNC retention project aims to examine whether the current retention regime for information held on the Police National Computer is appropriate. It is concentrating on a) criminal conviction information (which includes cautions) and b) other arrest related information (which did not result in a caution of a conviction)</li> <li>• The review is being led by the ACRO Criminal Records Office on behalf of National Police Chiefs' Council. The review team also includes staff from the Home Office LEDS Policy Team, from the Home Office Disclosure Policy Team and from those dealing directly with the Police National Computer.</li> <li>• The Review leader is funded until the end of December this year</li> <li>• We have agreed among ourselves a significantly revised deletion regime for non conviction-related information which will be put to the NPCC for</li> </ul>	Oct'18	
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

			<p>agreement. No agreement has been reached, even informally on court convictions. This is in part because we are still digesting the results of the P judgement re disclosure rules and because we are awaiting the Gaughran case in the ECtHR which challenges the retention of biometrics following conviction. The former requires secondary legislation, the latter has potential to require primary legislation.</p> <ul style="list-style-type: none"> <li>This Action will now include Action 71. HO to clarify Goughran policy re. how convictions held and how deletion works &amp; update Open Space</li> </ul>		
28	Governance: group want to see which powers have reviewed system.	Sep '19	<p><b>Complete for Audit and System Demo Artefact 9. Ongoing for Architecture.</b></p> <p>Ongoing: Compiling lists of groups that have reviewed Audit, System Demo and Architecture</p>	Oct'18	
30	HO to add headline issues to the timelines that are being discussed with law enforcement organisations and any other organisations and circulate to CSOs.	Aug'19	<p>Ongoing. Pending the outcome of the March Programme Board.</p> <p>NLEDP re-planning will be complete by Jan 2019 and the timeline will be constructed then. It will be circulated prior to workshop 4.</p> <p>Update – to be updated for May '19</p>	Jul'18	
31	Discussion to be had at future workshop on HO decision-making for what's included on system.	Sep'19	<p>Ongoing. Pending the outcome of the March Programme Board.</p> <p>Proposal for how this engagement might occur to be tabled. This sits with action 30.</p> <p><b>Update - Suggested date for discussion will be Sep 2019 Links to Action 43, 44, 86, 87 and 88. These actions will be included in this action</b></p>	Oct'18	

			<p>43. Discussion to be had at future workshop on what data should appear on screen for users.</p> <p>44. HO to bring new system prototypes to future workshops to review again.</p> <p>86. HO to share design principles for protected views with open space members.</p> <p>87. HO to arrange access controls demonstration when ready.</p> <p>88. HO to table two system integration demonstrations for internal and user interface processes.</p> <p>These actions to be added to the September Agenda.</p>		
35.	HO to provide summary of all industry consultation that has happened and is planned around LEDS to provide more clarity to existing Action 35.	Aug'19	<p>Created in July 18 and updated in May 19 asking for more detail.</p> <p><b>Update - Information is being compiled by the commercial team</b></p>	In progress	
45	HO come back to how fingerprint match will be highlighted on LEDS.	Sep 19	<p>Ongoing. HO commits to providing this information.</p> <p><b>Update - The information has been collated and will be presented with the system demo in September</b></p>	Oct'18	
47	HO to look into how new system will impact officer decision-making and therefore training.	Dec'19	<p>Ongoing. The Home Office will table a training paper by Dec'19 meeting.31</p> <p>the delay to LEDS has also delayed the training paper</p> <p><b>Update – internal timetabling of this output has started</b></p>	Jul'18	
50	HO to share with group when/how person record created.	Jul '19	<p>Ongoing. PNC and PND to be agreed in Feb 2019. This paper to be circulated to Open Space.</p>	Oct'18	

			<b>Update – update paper to be written up and provided end of July</b>		
51	HO to share number of records on PNC & PND now.	Jul '19	Partially Complete PNC records Artefact 6. The number of PNC records (see notes below). PND records needs further work to agree a useful definition of a record  Update – still working on the useful definition of PND records  <b>Update – update paper to be written up and provided end of July</b>	Oct'18	██████
52	HO to share outputs with CSOs from other impact assessment discussions.	Jul '19	Ongoing. Information being compiled. <b>Update Links to Action 21 and 24</b>  <b>Update – update paper to be written up and provided end of July</b>	Jul'18	██████
53	HO to share law enforcement mission statements with CSOs.	Jul '19	Ongoing. Information being compiled.  <b>Update – update paper to be written up and provided end of July</b>	Jul'18	██████
54	Involve to take helicopter view of process to see how decision is made for new areas to be brought into scope of the Open Space.	Jul'19	Ongoing. This will be arranged following the discussion of the future of Open Space in Feb'19.	Dec'18	██████
55	Home Office (HO)/Involve to arrange further conversation with the Minister to discuss the more strategic element of this work and how this Open Space can be developed in future.	Jul'19	Ongoing. This will be arranged following the discussion of the future of Open Space in Feb'19.	Dec'18	██████
56	HO/Involve to table a future Open Space discussion on further areas of scope that have been parked previously. HO invited CSOs to share ideas/suggestions of areas	Jul'19	Ongoing. This will be arranged following the discussion of the future of Open Space in Feb'19.	Dec'18	██████



	they would like to see brought to the space.				
62	Involve/HO to add section on access requirements and when topics will come back to the space.	Feb'19	Ongoing. This will be arranged following the discussion of the future of Open Space in Feb'19.	Dec'18	██████
64	HO/Involve to pull notes from discussion on list of users with access to system and add them to Access paper from previous workshop as documented changes.	Feb'19	Ongoing. This will be arranged following the discussion of the future of Open Space in Feb'19.	Dec'18	██████
66	HO to table a discussion at future workshop on whether there should be a LEADS Info Access Panel.	Sep'19	Ongoing. This will be arranged following the discussion of the future of Open Space in Feb'19.	Dec'18	██████ ██████
68	HO/Involve to table specific session on transparency at future workshop. Suggested stages of conversation: 1) Accessibility 2) Consultation 3) Mass understanding.	Sep'19	Ongoing. To be discussed alongside the Code of Practice, public guide and public consultations. This will be aided by the future publication timeframe shared in the governance and future of Open Space papers.  <b>Update – to be discussed in Sep alongside Draft Code of Practice</b>	Dec'18	██████
69	Results of the metrics from the data dashboard measures of accuracy pilot to be brought back to space post-March 2019.	Sep'19	Ongoing. Waiting for pilot to be concluded.  <b>Update – still awaiting pilot end</b>  We now have 23 forces either running the dashboard or about to onboard. From the data we have collected we estimate 25% of data assessed has an error. The data we have focussed on is that which has the biggest impact on the ability to link and connect data about people. It is important to note that these errors do not relate to the reliability of criminal justice outcomes or quality of investigations – it is an	Dec'18	██████


			<p>assessment of data linked to POLE entities (Person, Object, Location, Event). Examples include:</p> <ul style="list-style-type: none"> <li>• Missing or invalid postcodes</li> <li>• Duplicate persons with more than 4 matching identifiers</li> <li>• Duplicate CROs or PNCids</li> <li>• Invalid telephone numbers – usually because no dialling code has been recorded</li> <li>• Non alpha characters in forename or surname fields</li> </ul> <p>The initial dashboard focussed on the Police National Database, the intention is to provide similar performance data for the Police National Computer. It is anticipated that this will be circulated to forces September/October 2019. Whilst the questions asked of the data will be slightly different it will still focus on data relating to POLE (people, object, location, event).</p>		
77	HO/Involve to table a conversation on thresholds for deletion and Open Space members asked by HO to create statement informing HO what outcomes they want from HO custody image policy and HO to then see how can deliver this – this links to implications for wider records too.	Sep'19	<b>Ongoing. Substantive discussion on deletion is proposed for September</b>	Dec'18	
78	HO/Involve to table discussion on business rules for system.	Sep'19	Ongoing. This should be available for May Open Space, subject to agenda	Dec'18	

			<b>Update – roll this discussion to September</b>		
83	Involve to map stakeholders needed for an extended space incorporating biometrics work.  a. Biometrics Commissioner might be interested in being part of Open Space – Involve/HO to follow up.	July'19	Update - Initial conversations with CSOs to gauge interest and see if they could recommend any further groups. Further desk research will also be conducted to see if there are any more groups we've overlooked.	Dec'18	█
89	Involve to send out a matrix with organisations and issue areas so space members can identify the issue areas they want to engage on.	Feb'19	Ongoing - Reviewed action: sending out proposed agenda for feedback from CSOs instead. May re-visit this action if required for process design.	Dec'18	█
94.	A schedule of future HOB sessions to be developed and presented back to the group bearing in mind these focus areas for discussion.	Jul '19	<b>A paper providing more granular detail of the HOB Programme has been issued to Open Space participants alongside the agenda for the next workshop. The paper aims to:</b>  <ul style="list-style-type: none"> <li>• Provide Open Space with more granularity of the HOB Programme and systems</li> <li>• Invite the views from Open Space participants on the areas of most interest to them upon which future sessions can be designed.</li> </ul>	Feb'19	█ and █
95.	A combined map of HOB & other biometrics programmes & how they fit together to be brought back to a future meeting.	Jul '19	<b>This activity is currently being developed</b>	Feb'19	█
100	Follow up with Domestic Abuse/Victim Support charities to get feed in on this area and walk them through proposed changes	Jul '19	Ongoing. Update – Involve have had initial follow up with groups who couldn't make the February workshop & exploring how to bring in more feedback from these groups at future meetings.	Feb'19	█ &

	and other discussion areas from this workshop as none were in the room on the day.				
104	Map existing inspection and audit functions to identify gaps before annual review process	Sep '19	In Progress	Feb. 19	██████
105	Proposed governance structures to be reviewed and recommendations from this Open Space discussion to be incorporated.	Sep '19	In Progress	Feb. 19	██████
106	A proposal scoping the Open Space annual report to be developed and shared with Open Space members to review and feedback on before making final decision whether this type of report should be produced.	May '19	Update – paper to be discussed 14 May workshop	Feb. 19	██████
107	Unanswered questions from the Governance discussions to be appended to the next iteration of the Governance paper and covered during the next Governance discussion.	Sep '19	Ongoing. <b>Update - Looking at September as the candidate session to update on this</b>	Feb. 19	██████
108	Design future sessions to include more technical/concrete examples of what will happen in practice when LEDS (or variation of) is implemented.	Sep '19	Ongoing. <b>Update - Looking at September as the candidate session</b>	Feb. 19	██████ and ██████
112.	Involve check with other CSOs not in the room that they are happy for the Annual Report to happen and	June 19	<b>In progress</b>	May 19	██████

	check what involvement they would want. Involve will follow-up with participants individually to confirm their position.				
114.	HO to confirm if all information included in papers is publicly available and where it is publicly available. This will determine whether an Annual Report can be produced or not. Involve to share these identified places for this information with CSOs.	Sep 19	Started will be complete by 4 <sup>th</sup> July.  <b>Papers are being reviewed to redact on the basis of operational/commercial sensitivities and names of civil society organisations that wish to remain confidential and the names of officials below the senior civil service.</b>	May 19	██████████ /
116.	Involve to lead on the drafting process for the first Annual Report if all dependency factors raised in the Write Up are met.	Sep 19	<b>In Progress</b>	May 19	██████████
117.	██████████ to speak to ██████████ from ██████████ re. ESMCP.	July 19	In progress - Meeting arranged for July <b>Meeting to be re arranged</b>	May 19	██████████
118.	Involve to schedule yearly review, during the May workshop, of what is in/out of scope of the Open Space.	May 20	<b>Not started</b>	May 19	██████████
120.	HO to consider including what bad practice is in the Code of Practice.	Sep 19	<b>Started and under consideration</b>	May 19	██████████ /
121.	HO to confirm when Open Space can next see Code and public section of the document specifically. HO to confirm if it's possible to see it before it goes out to public consultation.	Aug 19	<b>Open Space will see document prior to consultation. This should happen in August</b>	May 19	██████████ /

122.	HO to produce and share "language of LEDS" document.	Aug 19	<b>Open Space will see document prior to consultation. This should happen in August</b>	May 19	██████
123.	HO to carry out further consultation with judicial services on the Code and explore how judges would interpret the Code.	July 19	<b>Ongoing</b>	May 19	██████ /
127.	HO to clarify answer to the question of whether a private facial image company could get a data sharing agreement with a local force, therefore by-passing the HO and their data sharing agreements?	Sep 19	<b>In progress</b>	May 19	██████ / ██████
130.	HO to confirm number of images that could be deleted through proposed process.	July 19	<b>In progress</b> - The number of images that could be deleted through this proposed process will be determined through the profiling work. It is not possible to determine the number of images until this profiling is complete. It is now not likely that this information will be available before the start of September. This is to allow for other profiling work already started to conclude. However, in the meantime, NLEDP will look at delivering outcomes around: developing governance, reducing legacy and optimising technology.	May 19	██████
134.	Set up a discussion on policy frameworks of future biometric and facial recognition work at a future Open Space session.	Sep 19	<b>In progress</b>	May 19	██████
135.	HOB to review idea of making information sharing agreements public as a rule.	July 19	<b>In progress</b>	May 19	██████

136.	HOB to build in review points for the Open Space going forward in the development of future DPIAs.	July 19	<b>In progress</b>	May 19	
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<b>Audit and Inspection</b>
<b>Code of Practice and training</b>
<b>Data Sharing</b>
<b>Data Quality</b>
<b>Governance</b>
<b>Open Space Process</b>
<b>Design</b>
<b>Papers and Information Updates</b>
<b>HOB</b>
<b>Custody Images</b>

LEDS OPEN SPACE ACTION LOG – 20/06/2019 v2.2.15  
Proposed Completed Action 20/06/2019

#	Proposed Complete Actions	Deadline	Status	When from?
10	HO to produce report on what defines an entity on system & session to be held on this at future workshop.	Jul'19	<p>Ongoing. This will be defined in a separate note.</p> <p>Bring back updated Code of Practice paper and paper on progress on Code of Practice together with what is an entity for Feb'19. Action 10,11,12,14, 15 will be included in combined paper.</p> <p>1 page paper to be written</p> <p><b>Update – paper written</b></p>	Oct'18
24	HO to explain governance around data onboarding.	Jul'19	<p>Ongoing. For information paper being drafted following Dec'18 discussion on governance.</p> <p>Update – LEDS business services being defined and prioritised. New Data sets are significantly more limited than previously identified. New data sets will be communicated to this group in advance of take on. Links to action 21 and 40.</p>	Oct'18



			<b>Update – Paper covering this governance is being drafted.</b>	
37	HO to share with CSOs a list of business services accessible through LEDS before next workshop.	Jul 19	<p>Ongoing. Pending the outcome of the March Programme Board.</p> <p>This will be shared as a for information paper following completion of the re-planning exercise in Mar 2019.</p> <p>Update – LEDS business services being defined and prioritised. New Data sets are significantly more limited than previously identified. Links to action 24</p> <p><b>Update – ██████ is drafting to share with CSOs by 14<sup>th</sup> May.</b></p>	Jul'18
39	HO confirmed that they will provide progress document to detail timeframes on the whole programme.	Jul'19	<p>Ongoing. Pending the outcome of the March Programme Board.</p> <p>Update provided to the effect that programme is being re-planned and therefore timeframes will only be possible after Mar 2019. March 2019 update. Updates provided monthly</p>	Jul'18
40	HO need to check how they can share data types but will review and follow up.	Sep'19	<p>Ongoing. This update paper will be shared following drafting and internal validation of the data types paper.</p> <p>Update – LEDS business services being defined and prioritised. New Data sets are significantly more limited than previously identified. New data sets will be communicated to this group in advance of take on. Links to action 21 and 24</p> <p>Paper should be ready by September</p> <p><b>Proposed closed and pick up in Action 17</b></p>	Jul'18

48	HO to provide clarity on what from LEDS is/isn't evidence.	Jul '19	Ongoing. Evidential paper to be agreed in Mar 2019. This paper to be circulated to Open Space.  Update – update paper to be written up and provided in May	Oct'18
49	HO to provide explanation of what “intelligence” covers.	Jul '19	Ongoing. Intelligence paper to be agreed in Mar 2019. This paper to be circulated to Open Space.  Update – update paper to be written up and provided in May	Oct'18
71	HO to clarify Goughran policy re. how convictions held and how deletion works & update space.	May'19	Ongoing. Awaiting the outcome	Dec'18
85	HO/Involve to table a discussion on what audit transparency would look like in the transparency discussion at a future workshop.	Jul'19	Ongoing. This should be available for May Open Space, subject to agenda.  Update - Discussions are ongoing with the Audit team about what specifically happens now within both PND and PNC and what will happen in LEDS. A simple measure such as number of audit checks and referrals to Line manager/PSD etc are fine but as soon as you branch out of that into convictions, misconduct findings etc there are so many other variables that affect it of which audit is just one.  The National Systems Auditor has just taken up post and the LEDS Audit product is still being defined as well as the accompanying audit regime.	Dec'18

			However, audit team would be keen to have a discussion on what data Open Space Members might like to see published. Hold in July.	
97	HO to lead separate conversation about the National Register of Missing Persons including data to be used and retained for this – Open Space members will be invited to these discussions if of interest and additional relevant HO colleagues will be invited to join too. HO and Involve to build these into beginning or end of a future workshop.	June '19	<p>Start w/c 25<sup>th</sup> speak to [REDACTED]</p> <p>Update- started and will conclude this month on best approach.</p> <p><b>Update – HO looking to hold a separate workshop in June focussed on NRMP to discuss NRMP and links with Immigration if these questions can't be answered ahead of time. The workshop will be a chance to input into the design of the NRMP.</b></p>	Feb'19

109.	Involve & HO to update and circulate to Open Space members a document explaining the scope of the Open Space process and where process has got to now and include a "Terms of Reference" for the space with this.	May '19	Update paper to be discussed 14 May workshop	Feb. 19
110	Unanswered questions from the Future of the Open Space discussions to be followed up on by the HO.	May '19	Compete	Feb. 19
113.	HO to share definition of official and sensitive information with CSOs to determine what materials from the Open	July 19	<b>Complete</b>	May 19

	Space can be shared in the Annual Report.			
115.	HO to produce public summary of programme to go in Annual Report.	July 19	<b>Complete</b>	May 19
119.	Explore pulling in ICO & other statutory organisations to give them responsibilities in the Code of Practice – check these are part of statutory responsibilities.	July 19	<b>A list of statutory bodies will be included in the Guide to the Code of Practice</b>	May 19
124.	HO to send a link to the current system Technical Document that is available online.	June 19	<b>Complete</b>	May 19
125	HO to explore role of how the Open Space will be involved in the data	June 19	<b>Closed - This will be added to Actions 116, 117, 118</b>	May 19

	sharing process and confirm this before the next Open Space. Artefact 1 covers some of this.			
126	HO to confirm if Open Space can involve local data controllers to help understand different paths being taken?	Sep 19	<b>Proposed Complete. Local force data controller has agreed to attend in September.</b> [REDACTED] from [REDACTED] Police will attend the Open Space in September 2019.	May 19
133	HOB to demonstrate Strategic Mobile equipment used at future workshop and hold a discussion on when these capabilities might be used.	July 19	<b>Proposed Complete Session will be in July</b>	May 19
128.	HO to share information on buckets of data and criteria using for	July 19	The rationalised list of buckets of data is attached as Artefact 11 and graded 1-5 (1 being the least risk). This assessment is based on the operational risk of deleting the data. So, for example, information and images relating to an offence should be deleted in accordance with the PACE 1984 Code D (2017) retention periods.	May 19

	deletion of custody images.		It is acknowledged this is different from the privacy risk. The current estimate of when deletion will start is in February 2020 after the proposed conclusion of the Custody Image Review. The outlined process involves discussion with strategic leads within law enforcement and privacy groups (including Open Space). Some manual intervention would be needed for instance when considering the difference between being arrested but not charged as opposed to being convicted, especially in the context of weighing up the privacy risk against the operational risk. Code D talks about the retention in the event of not being charged of a recordable offence for images and then is more specific for retention of DNA and fingerprints. This is essentially the Protection of Freedoms Act process. It has been previously discussed within Open Space how images are used in operationally different ways to DNA and fingerprints. At the July workshop there will be the opportunity to discuss this in further detail.	
129.	HO to update on progress of custody image review process and legislation and governance around this.	June 19	Custody Image Review (CIR2) will formally begin in August. Home Office has identified dedicated resource from within the Data and Identity Directorate. The review will be supported by policing and relevant external bodies (such as ICO). Terms of reference of this group will be agreed at the initial meeting in August and will be shared with the Open Space after that time. Early scoping work conducted to date by NLEDP will be used to support the development of the approach and TORs.	May 19
131.	HO to update on process for how slightly higher risk images will be deleted when HO get closer to migration.	July 19	Based on the attached list in Artefact 11 – those images linked to high risk criteria will be retained and migrated to LEDS. Law Enforcement needs to take a pragmatic approach to retention and the retention of images linked to people identified as high risk is warranted. It is proposed, based on the attached list below (also attached in Artefact 11), those images linked to high risk criteria will be retained and migrated to LEDS.	May 19

132.	HO to provide update on why deletion will be based on risk and not on custody status in interim update on custody image review.	June 19	The management of risk is based on what we know about those at risk and those who present a risk. Forces must have the ability to retain data (including images) that relates to those that present a risk – risk is determined by the severity of the offence, any non-PNC data (such as intelligence) about the individual and how old the information is. To only delete data based on the criminal justice outcome will mean that non-convictions for serious offences will be lost – this has particular implications for persons linked to organised crime groups and offences of modern slavery, stalking and harassment and domestic related offences.	May 19
137.	Involve to reach out to wider CSOs to invite them to join the NRMP conversation at the July 2019 workshop.	June 19	<b>Proposed Complete</b>	May 19
138.	HO to look into GMCNgin system and include in discussions in July if appropriate.	July 19	<b>Will include in July discussions.</b>	May 19



Audit and Inspection
Code of Practice and training
Data Sharing
Data Quality
Governance
Open Space Process
Design
Papers and Information Updates
Custody Images

LEDS OPEN SPACE ACTION LOG – 20/06/2019 v2.2.15

Completed Actions 20/06/2019

#	Completed Actions	Deadline	Status	When from?
1	HO to share list of LEDS users with group.	Dec'18	<b>Complete. Artefact 1</b>	Oct'18
2	Next stage of inspection regime to be shared with the group.	Feb'19	<b>Complete.</b> Inspection is included in the Governance update paper. Previous comments. Bring updated inspection discussion paper back into Feb'19 together with paper on progress on the inspection regime. Action 2,3,6,7,9	Oct'18
3	HO to map out different regulatory bodies that will cover LEDS and how this will work with different regulatory processes.	Apr'19	Ongoing this needs to be written after the programme board. This to be included within the updated inspection discussion paper back into Feb'19 together with paper on progress on the inspection regime.  Update – list of regulatory bodies has been compiled with text explaining the extent of the regulatory function and extent of the interaction with LEDS users and LEDS itself.  <b>Complete see Artefact A10</b>	Oct'18

4	HO to clarify if user such as probation services would have access to LEDS.	Dec'18	<b>Complete: Artefact 2</b>	Oct'18
5	HO to confirm if there will be access controls for LEDS users in the police for searching family information for example.	Feb'19	<b>Complete: Artefact 5</b> The answer is contingent on the approval of the audit system. HO to provide an update in Workshop 4.	Oct'18
6	HO to think about right body to run inspection regime taking into consideration different bodies discussed at the workshop.	Feb'19	<b>Complete.</b> Inspection is included in the Governance update paper.  Bring updated inspection discussion paper back into Feb'19 together with paper on progress on the inspection regime.	Oct'18
7	HO to use existing Inspection examples to create LEDS Inspection process.	Feb'19	<b>Complete.</b> Inspection examples to be discussed with inspectorate as part of commissioning the inspection regime for LEDS. HO has created candidate template inspection processes based around current examples and will incorporate into inspection paper.	Oct'18
8	HO to ask group for recommendations on required record keeping for new data added to system.	Feb'19	<b>Complete. Artefact 8.</b>  As new data sets are added into scope the HO to ask the Open Space for recommendations on record keeping. Links to Actions 21 and 32	Oct'18
9	HO to consider and come back to the group on whether there should be an annual report on the stats of use of the system.	Feb'19	<b>Complete. Paper on governance describes proposed annual reports.</b> HO is committed to producing annual statistics and will bring back to the group suggested statistics as part of the Updated inspection process paper	Oct'18
11	Code of Practice must include a mechanism for how it will be updated, on what basis including responses to inspection regime.	Feb'19	<b>Complete. Paper on Code of Practice submitted with mechanism.</b>  Bring back updated Code of Practice paper and paper on progress on Code of Practice together with what is an entity for Feb'19	Oct'18
12	HO to review all recommendations for Purpose Statement & Commitments and	Feb'19	<b>Complete. Paper on Code of Practice submitted. Recommendations reviewed, and paper updated.</b>	Oct'18

	update Code of Practice paper accordingly.		Recommendations were worked into an updated paper and this paper is being circulated amongst operational groups. Bring back updated Code of Practice paper and paper on progress on Code of Practice together with what is an entity for Feb'19	
13	HO to bring conversation of Public Consultation on Code back to the group.	Feb'19	<b>Complete. Paper on Code of Practice submitted need for consultation accepted.</b>  HO is now planning to open the consultation up to the public in addition to the formal consultation. Nearer the time the Open Space will be able to input into the proposed format of consultation questions.	Oct'18
14	HO to look at accessibility of the Code and providing hard copy information to users.	Dec'18	<b>Complete.</b> Commitment contained within the paper on the Code of practice. A limited number of hard copies of the Code will be produced.	Oct'18
15	HO to review if Code will include governance outline e.g. who to go to with whistleblowing concerns.	Complete	<b>Complete.</b> Code of Practice will include a section on whistleblowing concerns. A request for this has been shared with the drafters of the Code and a commitment for this will be included in subsequent Updated Code papers brought back to Open Space.  The Code of Practice will contain details on the establishment of local whistleblowing arrangements. The existence of the local whistleblowing arrangements will be inspected against. There will be references to National arrangements for whistleblowing contained in the Code.	Oct'18
19	HO to clarify level of accuracy of Data through the new Data Quality Dashboard and to share the Data Quality definitions.	Oct '18 and Dec'18	<b>Complete.</b> Discussion of impact of data quality. Complete. Anonymised copy of dashboard has been shared and the six measures of data quality described.	Jul'18

	These will feed into the Data Protection Impact Assessment (DPIA).			
22	HO to share blank copy of dashboard.	Dec'18	<b>Complete. Artefact 3</b>	Oct'18
23	Paper on governance to be brought back to a future workshop.	Dec'18	<b>Complete.</b> Initial paper on governance and substantive discussion at workshop 3.	Oct'18
25	Ensure governance of LEDS is a key topic in workshop 4 covering future service/capability & future engagement on this area too and will be threaded throughout the other workshops	Dec'18	<b>Complete. Discussion planned for Feb'19.</b>  Initial Governance paper will be discussed in Dec'18 and kept updated	Jul'18
27	Home Office to share high level view of recommendations from the Delivery Review to Open Space participants.	Dec'18	<b>Complete. Artefact 7.</b>	Oct'18
28	Governance: group want to see which powers have reviewed system.	Mar '19	<b>Complete for Audit and System Demo Artefact 9. Ongoing for Architecture.</b>  Ongoing: Compiling lists of groups that have reviewed Audit, System Demo and Architecture	Oct'18
29	To avoid the possibility of discussions in the Open Space being derailed at a late stage the HO to engage with relevant non-CSO actors early to avoid those last-minute amendments.	Complete	<b>Complete.</b> Input to and Output from Open Space fed through governance. Governance paper includes measure for how to ensure this risk does not occur.  Home Office to maintain engagement with non-CSO actors over the outputs from the Open Space.	Jul'18
32	HO committed to giving early warning to this space if Automatic Facial Recognition (AFR) and other areas are due to become part of Law Enforcement Data System (LEDS).	Complete	<b>Complete. Artefact 8.</b> Potential new data sets will be communicated to the Open Space along with the rationale for their retention.	Jul'18
33	Involve to follow up with Defence Lawyers & Law Enforcement organisations.	Mar'19	<b>Proposed Closed.</b>  <b>Update - Law organisations invited and attended last Open Space</b>	Jul'18

34	Request from group for ongoing process where group knows they can raise and discuss set issues in the longer term.	Complete	<b>Complete.</b> Discussion at Feb 2019 workshop. Achieved through Involve reaching out to Membership.	Oct'18
36	HO to share with CSOs list of competent authorities they are discussing LEDS with before next workshop and explain levels of access for those on the list.	Dec'18	<b>Complete: Artefact 1</b>	Jul'18
38	HO confirmed they will provide visual representation of system to CSOs.	Oct '18	<b>Complete</b>	Jul'18
41	Share slides with attendees.	Oct '18	<b>Complete</b>	Jul'18
42	Share "who else needs to be in the room?" criteria for CSOs to review & feedback on.	Oct '18	<b>Complete</b>	Jul'18
43	Discussion to be had at future workshop on what data should appear on screen for users.	Apr'19	Ongoing. The timing for the next system demonstration to the Open Space and this discussion to be taken after planning is complete in Mar 2019.  <b>Update - Suggested date for discussion will be Sep 2019. This links into action 31 and 44 Proposed complete</b>	Oct'18
44	HO to bring new system prototypes to future workshops to review again.	Apr'19	Ongoing. HO commits to bringing prototypes back to future workshops. Following planning compete in Jan 2019 a timeline for these prototypes will be shared.  <b>Update - Suggested date for discussion will be Sep 2019. This links into action 31 and 43 Proposed Complete</b>	Oct'18
46	Home Office (HO) to arrange demonstration of the high-level architecture and prototype for new	Oct '18	<b>Complete</b>	Jul'18

system for civil society organisations (CSOs).			
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57	Involve to colour code action log based on a set criteria to make it easier to digest.	Feb'19	<b>Proposed Complete</b>	Dec'18
58	Involve to create appendix of completed actions to be circulated with action log.	Feb'19	<b>Proposed Complete</b>	Dec'18
59	HO to bring completed actions to meetings so CSOs can sign them off as completed to their satisfaction.	Feb'19	<b>Proposed Complete</b>	Dec'18
60	HO/Involve to share action log at least a week in advance of each workshop for CSOs to review.	Feb'19	<b>Proposed Complete</b>	Dec'18
61	Involve to change "WS2" column to the date of the workshop instead.	Feb'19	<b>Proposed Complete</b>	Dec'18
63	Status of Action 35 to be corrected as not "complete" yet – needs to be brought back to the space first.	Feb'19	<b>Proposed Complete.</b>	Dec'18
65	HO welcomed further comments and questions on from CSOs after the workshop the list of users with access to system circulated at the workshop.	Feb'19	<b>Proposed Complete.</b> although no comments received	Dec'18
67	HO welcomed further comments/feedback from CSOs on data dashboard area after the workshop too. HO explained they can travel to organisations to have these meetings.	Feb'19	<b>Proposed Complete.</b> although no comments received	Dec'18
70	Summary of any follow up conversations/meetings between CSOs and HO on around data dashboard (or other open space topics) are to be shared with the space.	Feb'19	<b>Proposed Complete.</b> although no comments received	Dec'18

72	HO to clarify/confirm if how convictions are deleted can be discussed at future workshops.	May'19	<b>Proposed Complete.</b> Discuss in May 19 workshop.	Dec'18
73	HO to check if can share with the space the quote for custody image deletion work from current systems.	Feb'19	<b>Proposed Complete.</b> Custody image work relating to supplier's systems is commercially sensitive. However, a broader approach included in Custody Paper. This will get to the same position without exposing sensitive costings.	Dec'18
74	Paper from the HO on policy implications and technological options to be provided for next discussion on custody images.	Feb'19	<b>Proposed Complete.</b> Included in Custody Paper.	Dec'18
75	HO to bring road map/timeline to Workshop 4 in February to explain progress on custody image work.	Feb'19	<b>Proposed Complete.</b> Included in Custody Paper.	Dec'18
76	HO/Involve to table a discussion on how the open space members can influence custody image discussion when only some of many stakeholders – next conversation on this needs other key stakeholders in the room.	Feb'19	<b>Proposed Complete.</b> Included in Custody Paper.	Dec'18
79	HO/Involve to take core areas raised as parameters to design governance discussion at a future workshop.	Feb'19	<b>Proposed Complete.</b> This should be available for May Open Space, subject to agenda	<b>Dec'18</b>
80	Home Office Biometrics (HOB) to confirm if auto-matching includes unidentified human remains	Feb'19	<b>Proposed Complete.</b> Response sent through to Josie following the meeting in December. ██████ has asked a follow up question about whether the searching will stay the same in the new system and seeking confirmation from the project	Dec'18
81	CSOs to share, as part of the future discussion, the outcomes of what they want to see from their work and HOB to focus on suppliers and technology – HOB confirmed they can share this information if needed though.	Feb'19	<b>Proposed Complete.</b> The HOB Briefing session aims to identify areas of the programme that CSOs would like covered in future Open Space events	Dec'18

82	HOB to confirm with space members in what situations biometrics data is recorded.	Feb'19	<b>Proposed Complete.</b> This will be covered by the HOB Briefing session and the persona slides	Dec'18
84	HO to clarify if audit is done on data coming in from other systems and update the members of the space.	May'19	<p><b>Proposed Complete.</b> This should be available for May Open Space, subject to agenda.</p> <p>Update paper being prepared for May Open Space</p> <p>Update - All use of the API is fully audited – the API is the only way through which data arrives and leaves LEDS.</p> <p>NLEDP has defined a set of requirements for interfacing systems, which at a minimum expects (and enforces through the Code of Connection) that there will be a reference ID stored in both LEDS and the interfacing system which will allow the end to end audit trail to be reviewed. The requirement is that LEDS will audit; the date, time, system name, reference ID and content of all interactions.</p> <p>See Artefact 11</p>	Dec'18
86	HO to share design principles for protected views with open space members.	Apr'19	<p><b>Proposed Complete.</b> This should be available for May Open Space, subject to agenda.</p> <p>Update paper being prepared for July Open Space</p>	Dec'18
87	HO to arrange access controls demonstration when ready.	Apr'19	<p><b>Complete.</b> This should be available for May Open Space, subject to agenda.</p> <p>Update – to coincide with system demo planed for July Open Space</p>	Dec'18



			<b>Complete</b>	
88	HO to table two system integration demonstrations for internal and user interface processes.	Apr'19	Ongoing. This should be available for May Open Space, subject to agenda.  Update – to coincide with system demo planed for July Open Space.  <b>Update – This will not be possible for another year at least. However, it should be noted that systems that provide user interfaces will be under the same obligations to manage the data in the same way as for the Web applications. All user interfaces will have a standard set of data that they will have to show.</b>  <b>Complete</b>	Dec'18
90	Updated actions log (along with the rest of the papers for a workshop) to be circulated with more time for participants to review them and prepare questions.	May '19	<b>Complete</b>	Feb'19
91	A monthly update on the actions will be circulated to participants.	Monthly	<b>Complete- one update between Open Space sessions</b>	Feb'19
92	Unanswered questions from the Progress, Outputs & Actions discussion to be appended to the Outputs & Progress document and followed up by the HO.	May '19	<b>Complete</b>	Feb'19
93	Outcome of Programme Board meeting in March 2019 to be shared with Open Space members.	March '19	<b>Complete</b>  When outcome is available summarise and share	<b>Feb'19</b>

96	HO to review if Open Space could/should review analysis of responses to public consultation on the Code & update Open Space whether this could happen during next Code discussion.	May '19	<b>Complete</b> – The Home Office has agreed to this. The analysis of the public responses will be performed by the Home Office, however the Home Office is content for a review of the analysis against the responses received. The Code of Practice consultation will make clear this is happening and who will be able to read the responses.  See Artefact 12	Feb'19
97	HO to review use of term “citizens” in the Code instead using the suggested term of “People”.	March '19	<b>Complete</b> – drafting instructions now include the term People rather than citizens	Feb'19
98	Involve to research academics writing on biometrics and security and above suggestions – draw up a list, run past HO then reach out including [REDACTED] who published [REDACTED] academic evaluation recently – [REDACTED] to get contact for us from [REDACTED], [REDACTED] to prompt.	July '19	<b>Complete</b>  Proposed complete – bring in academics when required.	Oct '18
99.	Unanswered questions from the Code of Practice discussions to be appended to the next iteration of the Code paper and covered during the next Code discussion.	May '19	Ongoing – data on missing persons covered in action 97 then appended to papers brought back  Update – internal sessions are occurring to resolve those questions  <b>Complete</b>	Feb'19
101	HO to update the Open Space on progress of the Custody Image Review in 3 months, as well as interim (monthly updates).	April '19	Draft from monthly update  <b>Update</b> – see paper – suggestion that the Update is added to the Programme Update and tracked until Members suggest that it is closed as an issue.	Feb'19

			<b>Complete</b>	
102	Unanswered questions from the discussions to be appended to the next iteration of the Custody Image paper and covered during the next Custody Image discussion if not followed up on beforehand.	May '19	Draft from monthly update but all questions should be answered monthly.  <b>Complete</b>  Update – see Custody Image paper	Feb. 19
103	Feedback to interested participants to be provided around how LEDS will interact around the super complaint process in response to a participant question on this area.	March '19	<b>Complete – see Artefact 13</b>	Feb. 19
111	Involve & HO to schedule next 6 workshops beyond May 2019 & circulate dates to Open Space members.	April '19	<b>Complete</b>	Feb. 19
112	Involve to research academics writing on biometrics and security and above suggestions – draw up a list, run past HO then reach out including [REDACTED] who published [REDACTED] academic evaluation recently – [REDACTED] to get contact for us from [REDACTED], [REDACTED] to prompt.	July '19	<b>Complete</b>  Proposed complete – bring in academics when required.	Oct '18