



Law Enforcement Data Service Equality Impact Assessment 2025

Section 1: Title and Outline of issue under consideration.

- *The LEDS is primarily for policing and law enforcement use, focusing on public safety. By its nature, the LEDS contains a large amount of personal data, including sensitive personal data. Additionally, it allows authorised law enforcement organisations to access personal data held by other organisations. While LEDS itself does not create inequalities, it may reflect existing disparities within the criminal justice system.*
- *The National Police Chiefs' Council (NPCC) consists of Chief Officers of Police in England and Wales, which co-ordinates the work of the police service. The police service, through an NPCC lead, is driving the development of the system. They work collaboratively with their counterparts from Police Scotland and Police Service of Northern Ireland, establishing a Joint Controller Agreement for the sharing of data in LEDS.*
- *The Law Enforcement Data Service Programme was established to replace the PNC and sits within the Home Office Police and Public Protection Technology (PPPT) portfolio as a joint initiative between Policing and the Home Office. In data protection terms, policing are the Controllers, and the Home Office acts as Processor on their behalf. The Home Office is responsible for developing, supporting, and maintaining the technical LEDS service on behalf of and as directed by policing.*
- *All Users of the service are required to undertake a comprehensive training programme prior to accessing LEDS. This is tailored to the level of access a user has been granted and includes training on the Police National Computer/ LEDS Code of Practice.*

The LEDS data records mainly relate to criminal offences, however there are records which are maintained for safeguarding and wider policing purposes.¹ The LEDS is a mechanism by which information can be accessed and provides law enforcement with access to DVLA vehicle and driver databases and motor insurance and MOT data.²

- *There are also other wider law enforcement and non-law enforcement organisations who are authorised to access the data in LEDS who share a similar objective.³*

¹ A safeguarding purpose may include vetting activities.

² The use of Application Programming Interfaces (API) across much of LEDS means that far less data needs to be stored in the Service.

³ This includes the Crown Dependencies of Jersey, Guernsey and

- *The LEDS has 4 core datasets or services:*
 - *Person Service*
 - *Driver Service*
 - *Property Service*
 - *Vehicle Service*
- *The processing of personal identifiable data on LEDS will occur within the Person Service. This is where individual records are created, including arrests details and court outcomes.⁴*
- *At the time of writing, the Property Service is fully deployed to all police forces. The other services continue to be developed and tested to an agreed delivery schedule.*

Section 2: Consideration of aim 1 of the duty: eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the Equality Act 2010.

a. Direct discrimination

Step 1:

You should consider first whether the proposed action subjects any person to less favourable treatment than another person. If there is no less favourable treatment you can simply state: *The proposed action does not subject any person to less favourable treatment than any other person and therefore no direct discrimination arises.* You can then move on to section 2b and do not need to consider direct discrimination further.

- *The LEDS will process personal data, primarily, for the purpose of law enforcement which does not require the consent of the individual before it is processed in LEDS. The purposes for processing of data will usually be found in an organisation published Privacy Notice, via their website. Some records are required to be retained until a person is deemed to have reached 100 years of age, based on the seriousness of the offence or offender.⁵ This may be considered as unfair or less favourable when compared to individuals who do not have their information processed in LEDS. There is no evidence that this is done based on an individual's protected characteristics and therefore no direct discrimination occurs.*

⁴ Court outcomes are populated by the Bichard 7 System.

⁵ There are on-going consultations with stakeholders about the possibility of increasing beyond the 100-year rule.

- *The NPCC has commissioned a review in respect of data retention and disposal of these records in LEDS which is ongoing at the time of assessment of EIA. This review will consider the views of the judiciary, other stakeholders, and recent legislation and case law regarding the retention of data.*
- *There is a different data review retention and disposal protocol operating for criminal justice information collected in Scotland and Northern Ireland who issue separate guidance for those jurisdictions.⁶*
- *Though LEDS is primarily a law enforcement database, it also processes information additionally for general policing purposes that are not directly related to law enforcement reasons. Examples of this include LEDS processing information for those who hold a driving licence, those who legitimately hold a gun (licence), security vetting or have been reported as 'missing'. These instances may lead to individuals feeling stigmatised when compared to other individuals who have their data processed on databases for non-criminal matters. However, these instances contribute to the Police's wider public protection duties. In addition, LEDS has been designed to separate data relating to people who are not suspected of criminal activity. The outcome of the retention review will also feed into this. Subject Matter Experts are working with the LEDS Person service team to ensure data categories are defined to meet regulatory requirements. There is no evidence that this is done based on an individual's protected characteristics and therefore no direct discrimination occurs.*
- *The LEDS will process data belonging to many people, from all walks of life for example:*
 - *A person who has been arrested, charged, or reported for summons for the commission of, or involvement in, a recordable offence.*
 - *A person who is wanted for committing a specific offence.*
 - *A person who has been reported missing or has been found.*
 - *A person who is subject of a particular type of Court Order or conviction.*
 - *A person who has reported the loss of an item of property.*
 - *A person who has an entry on the National Firearms Licensing Management System.*
- *By its nature, the processing will result in some individuals being treated less favourably as a consequence of being suspected or arrested or prosecuted as an offender. Some information related to criminal activity is not disclosed in many circumstances. For example, the law enables some criminal convictions to be ignored after a*

⁶ Whilst Police Scotland Northern Ireland (PSNI) have their own retention regime of PSNI records the records on LEDS will be managed under the policy for England and Wales, while separate provision will be made for Police Scotland.

rehabilitation period determined by the sentence. After this period, if there has been no further conviction the conviction is “spent” and, with certain exceptions, does not need to be disclosed by the ex-offender in any context such as when applying for a job. LEDS will be available to the Disclosure and Barring Service (DBS), Disclosure Scotland and AccessNI (in Northern Ireland). These organisations disclose records in relation to requests by prospective employers. The time periods after which a spent conviction will no longer be disclosed are 11 years after conviction, and for those under 18 years old it is 5 and a half years. This will include some children who may not recognise or understand the long-term consequences of having their information stored in a criminal database.

- There are also positive impacts of the inclusion of children’s data in LEDS. In the future, policing could potentially share information with schools to let them know about children who have faced domestic abuse or other difficult experiences. The sharing of a Missing Person service is viewed by agencies as a positive development for children who are missing, increasing the sharing of information between policing and agencies who support families where their loved ones are missing. This may be especially the case in situations where children may be trafficked, or where they may be exploited under what are known as ‘county lines,’ where drugs are transported from one area to another, often by children who are coerced into it by gangs.*
- There is no evidence that the LEDS system subjects anyone to less favourable treatment.*

Step 2: If the proposed action does or may subject a person to less favourable treatment than another person, you must consider whether this is because of one of the protected characteristics. In other words, the test you need to consider is whether the proposed action does or may subject a person to less favourable treatment because of one of the protected characteristics, when compared to a person who does not share that protected characteristic.

It is possible that LEDS could be perceived by the public as treating people whose information is held in LEDS less favourably than a person that is not. The Child’s Rights Impact Assessment (CRIA) has recently been published on gov.uk alongside the previous version of the EIA and DPIA for LEDS. This gives the public a chance to review the service and provides a degree of public scrutiny. The Home Office and Policing are committed to ensuring that the design and use of LEDS are undertaken with equality in mind. For example, the Programme is undertaking a review of the terminology used within PNC to ensure it aligns to current industry data categorisation standards. LEDS design includes features such as dropdown boxes which reduce the use of wide use of free text functionality. This constrains the range of answers, reduces human error and makes the collation of data easier.

Users undergo a mandatory training to ensure they are aware of their roles and responsibilities when interacting with the public.

There are also wider training initiatives being developed by forces. For example, a detailed training package is available for all LEDS users. The 'Policing Together Programme' set-up by Police Scotland aims to build relations with underrepresented communities and includes a mental health taskforce and Distress Brief Intervention training. Such initiatives serve to improve the treatment of the wider community as a whole not just those with their data held on a police database.

The below will consider each of the protected characteristics, in turn, and assess any potential impacts from LEDS.

Age

- *Children's ability to be found culpable for a crime is defined in law. England, Wales, and Northern Ireland have one of the lowest age of criminal responsibility in Europe. This means that a child under the age of 10 cannot be arrested or charged with a crime and will not be entered as such in LEDS.*
- *The government statistics on youth justice stated that there were 58,899 arrests of children in the year leading up to 2024,⁷ whilst only 17,859 proceeded to court or 4,317 cautioned.*
- *LEDS will include children's information. This will not always be for reasons of offending, where in England, Wales, and Northern Ireland, the age of criminal responsibility is age of 10,⁸ e.g. If a young person has an encounter with the Police, it may be necessary to record this. In other circumstances, children's information may be recorded because of their link with an adult. For non-criminal matters policing to continue to hold information about a person that **could** be at risk of harm. It is possible that this may be perceived as being unfair or less favourable when compared to children (or adults) who have not encountered Policing. However, the rationale behind holding their data tends to be for their added protection due to the vulnerability of their age. For example, a child's data will be recorded on court orders made against adults, in relation to them e.g. for a Female Genital Mutilation Protection Order or Forced Marriage Protection Order. Police can create an entry in LEDS for a child who is or linked to a perpetrator or suspected perpetrator where those children are deemed to be at risk and in accordance with the law. The deletion of the data, by local policing in England and Wales is subject to a risk-based review process that will continue to apply to the data in LEDS until the new RRD policy is in place. There is a different data review retention and disposal protocol operating for criminal justice information collected in Scotland and Northern Ireland. The recently published CRIA states that*

⁷ [Youth Justice Statistics: 2023 to 2024 - GOV.UK](https://www.gov.uk/government/statistics/youth-justice-statistics-2023-to-2024)

⁸ In Scotland, it is 12 years old and in Guernsey, Jersey and the Isle of Man, as Crown Dependencies are not part of the UK and have their own legal systems and criminal laws

the ongoing LEDS retention, review and deletion process should include considerations of the specific concerns regarding children's data that is held in LEDS. The different jurisdictions within the UK means that there is a variance in ages for the age of criminal responsibility across the UK means that young people, who may live just a few miles apart, could have separate experiences regarding their experiences with police powers as well as differing retention rules for their data in LEDS.

- *The Programme has commissioned a Child's Right Impact Assessment (CRIA) for LEDS. The aim was to help identify which children's rights could be impacted by LEDS and to establish what might be required to ensure the protection of children's rights within LEDS at the end of its development. This has involved stakeholders from the Children's Commissioner, ICO, as well as a quantitative focus group session with young people. Overall, LEDS should have a positive impact on children's rights. The CRIA has been published on gov.uk and will be reviewed at appropriate intervals.⁹*
- *The College of Policing have published a range of guidance under the Authorised Professional Practice (APP).¹⁰ This guidance provides officers with strategies and policies to better understand communities and to identify and respond to risks when working with vulnerable individuals.*
- *There is no evidence the data in LEDS treats anyone less favourably due to their age – It is likely that LEDS reflects the inequalities which exist in the wider criminal justice system. The LEDS has inbuilt mitigations to protect the data, including full audit capabilities for both users and systems.*

Disability

- *The LEDS is an offender led system, which means individual details are not solely created for disabled victims or witnesses.¹¹ For the*

⁹ <https://www.gov.uk/government/publications/law-enforcement-data-service-leds-child-rights-impact-assessment>

¹⁰ [Policing guidance | College of Policing](#)

¹¹ LEDS would capture the personal details of the owner of a missing item in the Property Service.

purposes of the Equality Act 2010, disability is defined as: A physical or mental impairment that has a 'substantial' and 'long-term' negative effect on an individual's ability to conduct normal daily activities. Some conditions, like cancer, HIV infection, and multiple sclerosis, are automatically treated as disabilities under the Equality Act.

- *A person's disability status, whether as an offender or victim/witness, may be processed on LEDS as a safeguarding matter. There are several flags that can be used to inform an officer about a person's disability status. For example, the 'mental health', 'Ailment', 'Blind' or 'Hearing aid' tag as well as a for a person who suffers from a medical condition or disability and/or requires medication. These tags will be transferred from PNC into LEDS. Some health data relating to the driver is also shared by the DVLA with LEDS users via an Application Programming Interface (API).¹² This means that the data is accessed but not stored in LEDS. The Programme is undertaking a review of the terminology used within PNC to ensure it aligns to current data categorisation standards.*
- *The rate of disability hate crimes has fallen by 18% in the year leading up to April 2024. This was the lowest figure for 4 years, with stalking and harassment offences being the most recorded disability-targeted hate crimes.¹³ It is possible that more details of crime recording may be captured on local police systems. The NPCC have also produced guidance to ensure officers are aware cultural sensitivities and how to make use appropriate terminology when dealing with the public.¹⁴ The LEDS is being developed to ensure Users are only capturing information that is necessary and proportionate by specifying data fields, e.g. character value, format, length. This helps to maintain the data quality and integrity of the system.*
- *There is no evidence the data in LEDS treats anyone less favourably due to their disability.*

Gender Reassignment

- *The protected characteristic of gender reassignment relates to a person proposing to undergo, who is undergoing or has undergone a process (or part of a process) for the purpose of reassigning their sex, physiologically or other attributes of their sex.*
- *The term 'gender reassignment' is also understood to encompass members of the trans community. The Equality and Human Right Commission (EHRC) has determined that it is an outdated and*

¹² Driver information includes eyesight and or hearing restrictions.

¹³ [Hate crime, England and Wales, year ending March 2024 - GOV.UK](#)

¹⁴ [Police Race Action Plan: Improving policing for Black people](#)

misleading term and the use of 'trans' better reflects that community.¹⁵ LEDS has been designed to accommodate legislative changes. In 2025 the Supreme Court case: For Women Scotland-v-The Scottish Ministers, defined the interpretation of "sex," "man," and "woman". The court determined that these terms referred to a person's biological sex at birth. The NPCC subsequently published a draft interim guidance on searches of members of the transgender community, as well as searches carried out by transgender police officers and staff. It states that thorough police searches, such as those which expose intimate body parts, should only be carried out by police officers and staff of the same biological sex as the detained person. Their ongoing policy review aims to strike a balance that is both lawful and respectful of all individuals involved. As a modern system, LEDS is being built to configure new policies as they take effect.

More than 1 in 4 transgender people (28%) had experienced crime, compared with 14% of those whose gender identity is the same as the sex they were registered at birth. The LEDS is primarily a record of suspects and criminals and has several 'Information Markers' that can be used to attach to a person's record as 'Gender reassigned'. As before, this tag cannot be applied to a victim or witness though this information may be material to the scenario at hand.

- *Further guidance is being prepared by many public facing organisations including the NPCC on this area. There is a National Protected Characteristics Data Recording Standards group working to the Diversity, Equality and Inclusion Coordination Committee and NPCC Diversity Equality and Inclusion Lead. At the time of writing, a proposed new coding scheme have been drafted and submitted to the NPCC for review and approval in the coming months. Its approval is a critical enabler for the broader scope of work to embed the national protected characteristics data standards effectively across policing IT systems and equip policing with the correct knowledge and skills, ensuring a consistent and scalable implementation. This is likely to proceed in collaboration with the DDAT Committee and the College of Policing.*
- *There is no evidence the data in LEDS treats anyone less favourably due to their Gender reassignment status.*

Pregnancy and maternity

- *Pregnancy status is intrinsically linked to an individual's sex in that only biological females can become pregnant, whilst both men and women can be involved in maternity. This also accounts for pregnant trans-men. The LEDS will inevitably hold records on pregnant women as*

¹⁵ [Gender reassignment discrimination | EHRC](#)

both offenders and victims as well as members of the wider community. As a system created to primarily record a person's arrest and convictions, pregnant women are arrested and convicted of crimes. As a result, LEDS will record information on women who are, at that specific point in time, pregnant.

- *Similarly, maternity refers to the period before and after the birth and is linked to maternity leave in the employment context.*
- *There is no evidence the data in LEDS treats anyone less favourably due to their pregnancy and maternity status.*

Race (this encompasses, nationality, ethnicity, colour and national or ethnic origins)

- *A person's colour is regarded as a key factor used to positively identify an individual. The 2021 Census showed that from the population of England and Wales, White people made up 81.7% of the population, Asian people made up 9.3%, and Black people made up 4.0%.*
- *The Police began classifying arrests in racial groups in 1975 and this continues to form the basis of the present-day use of Identity Codes (IC). LEDS uses the term ethnicity categories to make the distinction between races for the purpose of identification. This is known as the '6+1' identity codes (below) and is a description by an officer of their perception (based on skin colour). This relates to offenders/suspects records:*

- 1 White – North European*
- 2 White – South European*
- 3 Black*
- 4 Asian*
- 5 Chinese, Japanese, or Southeast Asian*
- 6 Middle Eastern*
- 7 Unknown*

- *These codes are limited and means that there is no identity code describing people from South America for example, so a person from Brazil may be described as White, Black or Asian. This would be largely determined by an Officer, based on the colour of that person's skin colour. An individual's identity is often more multilayered.*
- *One of the key recommendations of the Steven Lawrence inquiry was that individuals should be allowed to self-define their ethnicity when interacting with public services, especially the police.¹⁶ As a result,*

¹⁶ meaning individuals are asked to identify their own ethnic background using categories aligned with the UK Census - The Macpherson Report 1999

Police forces were required to record the ethnicity of individuals based on how the individual self-identifies, not only on how the officer perceives them. Due to the legacy nature of PNC, this could not be incorporated. However, LEDS being a modern and adaptable service will, over time, better incorporate emerging policy decisions, legislation and best practice implemented in local force systems. This includes the incorporation of self-identified ethnicity information, which is available in local police systems. In Northern Ireland there is an additional requirement in stop and search powers to capture or assess community background.

- *The LEDS also contains several data-fields that could indicate a person's nationality or ethnicity. This information builds on a person's existing record collected on LEDS and not mandatory information. There are varying rates of capturing this dataset which will be reflected in LEDS. It will not be possible to search on these criteria only, with the minimum requirement being a person's surname. The Audit Service will ensure any misuse of LEDS is accurately captured and capable of supporting future prosecutions. This includes data fields for:*
 - *Accents – e.g. Spanish, Welsh,*
 - *Hair features – e.g. Afro, Wavy*
 - *Nationalities – e.g. Poland, Australia*
- *There is no evidence the data in LEDS indirectly treats anyone less favourably due to their race.*

Religion or Belief

- *A person's Religion relates to their individual belief, including religious and philosophical and includes a lack of belief (e.g. Atheism). Though recorded hate crimes have generally gone down by 5% in the year leading to March 2024, religious hate crimes went up by 25%, from 8,370 to 10,484 offences*
- *LEDS does not have a separate data field capturing a person's religious status. A person's religious status would only become relevant if it is pertinent to a specific offence, e.g. violence against individuals due to their religious affiliation or on-line hate speech.*
- *There is no evidence the data in LEDS treats anyone less favourably due to their religion or beliefs.*

Sex

- *The population in the UK is made up of 51% females to 49% males. Females account for 16% of arrests in England and Wales, which has*

remained stable over the last 3 years.¹⁷ As part of creating a person's record, LEDS categorises individuals under their sex, e.g. Male, Female or Unknown. It is possible in those situations alongside other information such as an Occupation or a person's name to assume their sex on LEDS (where it is not stated).

- There are some specific offences, for example, that disproportionately impact females such as offences regarding genital mutilation, forced marriages, domestic violence and rape. Though these instances would initially be recorded in local crime systems as victims. The LEDS is primarily about recording offenders, not victims. However, this may subsequently be added onto LEDS. There are instances of the above situations also affecting males, with some categories such as female domestic violence perpetrators having increased in recent years.
- In general, females appear to be substantially underrepresented throughout the Criminal Justice System (CJS) compared with males for a myriad of reasons. Many women in the CJS have histories of abuse, trauma, or coercion, which can influence both their offending behaviour and how they are treated by the system.¹⁸
- The Crime and Policing Bill will introduce legislative changes to strengthen protection for women and girls.¹⁹ Namely, around stalking with new 'Right to know' provisions allowing police to share stalker identities with victims under safeguarding laws. The Police are now empowered to **disclose the identity of online stalkers** to victims earlier in the process, even before formal charges. This addresses cases where stalkers use multiple aliases, leaving victims unaware of who is targeting them.
- In June 2025 Baroness Casey completed an audit of child sexual exploitation and abuse in the UK. It collated evidence on how institutions in the UK had historically failed to deal with the protection of young girls from sexual exploitation. Her report focused on three large police forces, where men of Asian and Pakistani heritage were over-represented as perpetrators of the abuse of mainly White teenage girls. She made 12 recommendations, cutting-across policing, health authorities, local councils and educational agencies. She identified that authorities were reluctant to investigate the ethnicity of offenders for fear of it being seen as racist. Her report categorically stated that it was not racist to examine the ethnicity of offenders. Authorities were unable to join-up their findings due to a lack of national cohesion, restrictive working practices and an inability to sharing/access data across agencies. There is potential, in future, for LEDS to directly support these recommendations. For example, recommendation 4 calls for ethnicity and nationality data to be collected as a mandatory

¹⁷ [Statistics on Women and the Criminal Justice System 2023 \(HTML\) - GOV.UK](#)

¹⁸ [Women's experiences of crime and the criminal justice system - POST](#)

¹⁹ This Bill is expected to achieve Royal Assent in 2026 - [Crime and Policing Bill](#)

requirement for all suspects.²⁰ LEDS can support this as a national criminal database, enabling better data sharing and underpinning the development of a new police performance framework proposed in the report.²¹

- *There is no evidence the data in LEDS treats anyone less favourably due to their sex.*

Sexual Orientation

- *A person's sexual orientation refers to whether their sexual attraction is towards their own sex, the opposite sex or to both sexes. LEDS does not have any specific data fields to record a person's sexual orientation. In cases of aggravated offences such as homophobic, biphobic and transphobic hate crimes that data would more likely be captured in local crime management systems when relating to victims.*
- *There is no evidence the data in LEDS treats anyone less favourably due to their sexual orientation.*

Marriage and Civil Partnership

- *The Marriage Act 2013 expanded the definition of marriage to not only a 'union between a man and a woman'. The Act makes it clear that marriage is not limited to opposite-sex couples. In additions, same-sex couples can also have their relationships legally recognised as 'civil partnerships' and must be treated the same as married couples on a wide range of legal matters. LEDS does not single out this dataset, unless the information is relevant to an incident*
- *There is no evidence the data in LEDS treats anyone less favourably due to their Marriage or civil partnership status.*

Step 3: If you have identified that there is or may be less favourable treatment of a person because of a protected characteristic, when compared with someone who does not share that protected characteristic, this will constitute unlawful direct discrimination unless the protected characteristic is disability and you are treating the disabled person more favourably than a non-disabled person, age, or there is a relevant exemption in the Equality Act 2010 that can be relied on. You should therefore seek input from HOLA if you are considering relying on an exemption. You should set out clearly the exemption you rely on.

²⁰ The 2025 Casey report also call for race and nationality data to be collected for victims.

²¹ https://assets.publishing.service.gov.uk/media/685559d05225e4ed0bf3ce54/National_Audit_on_Group-based_Child_Sexual_Exploitation_and_Abuse.pdf

- *The introduction of LEDS does not subject individuals that have their data captured and stored on LEDS less favourable.*

b. Indirect discrimination

Step 1: You should consider whether the policy, position in guidance, or operational position you are taking applies equally to all persons, irrespective of their protected characteristic. This is because even if a policy, procedure, criterion, practice etc applies equally to everyone, it could still give rise to indirect discrimination.

- *The LEDS can be used for the processing of the data for all members of the public equally, regardless of protected characteristics. This may be for a law enforcement or safeguarding purpose.*

Step 2: You should consider whether the impact of the policy will or may place any person at a disadvantage, even if that disadvantage is slight. If you have identified that the policy may place some persons at a disadvantage (for example because the impact will be particularly severe for them, or if they may be less able to comply with a requirement) you should consider whether people who share any of the protected characteristics are more likely to be in the disadvantaged group as compared to those who do not have that protected characteristic. In some cases, whether a protected group will be particularly disadvantaged will be obvious, however in other contexts you may need to consider relevant statistical data or seek input from HOAI. In particular if you think that your protected group might particularly impact a particular community or demographic (e.g. people who live in a particular part of the UK, or people who are part of a particular social group such as care leavers or prisoners), you should consider whether that group is disproportionately represented by any of the protected characteristics.

By virtue of LEDS being mainly used as a database of criminal convictions it will include data from local police force custody systems. It also contains outcomes of cases from Magistrates' and Crown Courts. The data may subsequently be used to legitimately deny someone a service and / or an opportunity that may otherwise have been available to them or other people, e.g. a criminal records check via the Disclosure Barring Service. This must be balanced with the overall safeguarding objective for the protection of vulnerable people.

The protected characteristics are considered below:

Age

- *In England and Wales there are approximately 5,000 youth cautions given to young offenders under the age of 17. The younger the*

offender, the longer any potential impact can have on their lives when their data is on LEDS.

By virtue of a child's age, there is potential that their data maybe held longer on the LEDS than that of an older person. Children aged 10 – 17 years old can be given a youth caution as a formal out of court disposal if they admit to a criminal offence. Some of the indirect consequences of collection and retention of children's data can affect them later in life, for example where people are refused potential opportunities in employment or are unable to relocate to other countries because of data held in national systems such as LEDS.

Children may act with less consideration for the effects in later life of having information recorded concerning criminal activity. Unlike PNC, LEDS is expected, in time, to be able to verify a person's age, making it much easier to ensure additional protections where this is necessary.

- *UK Legislation; The Rehabilitation of Offenders Act 1974 (England and Wales the Rehabilitation of Offenders (NI) Order 1978. (Northern Ireland) and The Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Scotland) Order 2013; enable some criminal convictions to be ignored after a rehabilitation period. The rehabilitation period is automatically determined by the sentence. After this period, if there has been no further conviction the conviction is "spent" and, with certain exceptions, need not be disclosed by the ex-offender in any context such as when applying for a job, obtaining insurance, or in civil proceedings.*
- *Under existing national guidance on the PNC conviction records are required to be retained until a person is deemed to have reached 100 years of age. The NPCC has commissioned an ongoing review in respect of data retention and disposal of these records in LEDS. This review will consider the views of the judiciary, other stakeholders, and recent legislation regarding the retention of data required for ongoing inquiries, which may relate to data concerning children.*
- *There are positive impacts of the inclusion of children's data in LEDS. Police can quickly share information with schools to let them know about children who have faced domestic abuse or other difficult experiences. The inclusion of a Missing Person/product/service is viewed as a positive development for children who are missing, increasing the sharing of information between policing and agencies who support families where their loved ones are missing. This may be especially the case in situations where children may be trafficked, or where they may be exploited under what are known as 'county lines,' where drugs are transported from one area to another, often by children who are coerced into it by gangs.*
- *For non-criminal justice information, captured under UK GDPR and the DPA 2018 part 2, there may be indirect consequences as to whether it*

is appropriate for policing to continue to hold information about a person that could be at risk of harm. This is particularly relevant to the Missing Person data which LEDS will hold, and which may have proportionately more data relating to children. There are nearly 350,000 reported incidents of missing people every year. Approximately 130,000 incidents relate to missing adults and over 216,000 relate to missing children.²² There are missing people who are located shortly after they are reported and a smaller number who choose to be missing. Keeping this data in the database increases the risk that it can be inappropriately processed. The future development of LEDS as a new system does present an opportunity to rectify such issues.

- *There is a different data review retention and disposal protocol operating for criminal justice information collected in Scotland and Northern Ireland. Police Scotland and Police Service of Northern Ireland (PSNI) issue separate guidance for those jurisdictions. The LEDS will be developed to facilitate all necessary review, retention and deletion policies.*
- *There are some instances when LEDS may indirectly place people at a disadvantage because of their age, especially the young. For example, where their data is kept longer than is necessary and the potential negative consequences of criminalisation on later life chances. The LEDS CRIA process has highlighted areas for improvement once the Service is the sole system. In addition, the NPCC RRD (review retention and disposal) is ongoing and is expected to address these data issues for children and young people.*

Disability

- *The neurodivergent disabilities can pose a risk of discrimination where the disability of a person is not or cannot be acknowledged at point of contact, including with the police. For example, autism, depression, diabetes, learning and thinking differences such as ADHD and dyslexia. These may all have an impact on how and what a person's interaction will be with LEDS and policing.*
- *The Police are not allowed to treat people less favourably because of their disability and their actions must not have an adverse effect on individuals just because they are disabled. LEDS supports Policing to achieve this by having a specific LEDS Audit Service which captures,²³ stores and provides access to all records of the activities of users who are processing data in LEDS. This provides a safeguard that allows*

²² [Key statistics and information about missing - Missing People](#)

²³ In compliance to section 62 of the Data Protection Act 2018

auditors to identify misuse, whether malicious or otherwise. This can also highlight other variances such as issues around data quality or the need for more training.

- *Policing has in place procedures and policies at both a national and local level, to help manage their encounters with disabled members of the public as well as their own personnel.²⁴ For example, where a disabled person is stopped and searched by Police and their data, they have the right to a written or electronic copy of the record of that search in a way that accommodates their disability. Their data will be collected and stored in the forces internal systems. In addition, the duty to make reasonable adjustments for disabled people may mean (depending on the scenario) that they need to take extra measures that may assist the situation, e.g. speaking much more slowly and clearly, enabling opportunities for lip reading and giving individuals more time to answer their questions.*
- *The LEDS does not appear to indirectly place people at a disadvantage because of their disability.*

Gender Reassignment

- *The Gender Reassignment Act 2004 allows people who have lived in their preferred gender for at least two years to change their sex lawfully by applying for a Gender Recognition Certificate (GRC). There is no legal obligation on any person with a GRC to inform the police that they have changed their name or gender. Where a person does wish this to be acknowledged then LEDS user can add an Information Marker (GR and/or 'living as Male/Female') to a person's record. Currently, the Home Office has a Reconciliation Team, who is acting on the authority of Policing, to amend an individual's record. At the time of writing, it is unclear what the impact of the Supreme Court ruling in April 2025 will have on this process. As noted above, the NPCC are currently considering their policy approach after the outcome of the Supreme Court ruling, associated research,²⁵ and the recommendations from the Casey Review relating to the collection of ethnicity and nationality.²⁶*
- *It may be that some members of this protected group feel they are unable to adequately identify themselves on LEDS. This will be governed by legislation and policies, ensuring that LEDS is being developed to be an evolving and adaptable policing system, capable of reflecting legislative and societal changes.*

²⁴ [Disability rights: Police - GOV.UK](#)

²⁵ [Independent review of data, statistics and research on sex and gender - GOV.UK](#)

²⁶ https://assets.publishing.service.gov.uk/media/685559d05225e4ed0bf3ce54/National_Audit_on_Group-based_Child_Sexual_Exploitation_and_Abuse.pdf

- *The LEDS may place some members of the trans community of indirect disadvantage of being mis-gendered if their information does not reflect the gender they choose to live as. Misgendering occurs when there is an intentional or unintentional reference to a person or the use of language to describe a person that does not align with their chosen gender. Section 22 of the Gender Recognition Act 2004 protects transgender people being outed against their will.*

Pregnancy and Maternity

- *When arresting pregnant women, UK police follow specific procedures to ensure their health, safety, and dignity are protected. The Police have a general duty of care under the law of negligence to avoid causing foreseeable harm and when dealing with pregnant women, this duty is heightened due to the increased medical and emotional vulnerability. A 2019 Royal College of Midwives report recommended that Women should be asked sensitively and in private about any caring responsibilities they have or if they are pregnant, at any contact with the criminal justice system including by the police.²⁷ LEDS does not have an associated marker signifying whether a woman's data is held in LEDS is/or may be pregnant or in a period of maternity. There are a limited number of free-text boxes that can be utilised for this purpose, where it is deemed relevant to do so.*
- *The Corston Report (2007) identified several potential needs and vulnerabilities in relation to detained women. The report called for training police officers to recognise and respond appropriately to the vulnerabilities of women, including those who are pregnant or have experienced trauma, modes of restraint, transport and the potential requirement for additional and different types of food and/or drinks).*
- *At the time of writing, there is no single unified UK police policy specifically dedicated to dealing with pregnant women in custody outside the duty of care. LEDS has been designed to configure changes as and when they are confirmed by Policing.*
- *The LEDS does not appear to cause indirect disadvantages in relation to the protected characteristics of pregnancy and maternity.*

Race (this encompasses, nationality, ethnicity, colour and national or ethnic origins)

- *A key area of focus in recent decades has been on police power to stop and search individuals. This can be done on both 'reasonable grounds'²⁸ and not requiring reasonable grounds.²⁹ There is a long and complex history around these powers that have centred on its*

²⁷ [rcm-position-statement-perinatal-women-in-the-criminal-justice-system.pdf](#)

²⁸ Section 1 of the Police and Criminal Evidence Act 1984 (PACE)

²⁹ Section 60 of the Criminal Justice and Public Order Act 1994

disproportionate use of the powers against black and ethnic minority youths. In England and Wales there were 22.4 stop and searches of individuals from a black background per 1,000 population in the year ending March 2024. This is the highest overall rate compared with all other ethnic groups and 3.7 times higher compared with the white individuals.³⁰ The consequences of being involved with law enforcement as an offender or suspect are more likely to have a detrimental impact on members of black and ethnic minorities and their life chances. There may also be biases in the application of the law at all levels of the Criminal Justice System in the UK. The LEDS is a national database used by policing and other law enforcement agencies and does not contain any discriminatory language; however, a review will take place as part of data quality assurance.

- *In February 2025, the Metropolitan Police introduced a new Stop and Search Charter,³¹ following recommendations from the 2023 Baroness Casey Review.³² The College of Policing has also produced useful guidance for Officers.³³ This aims to improve the quality of searches, provide better officer training as well as the use of Artificial Intelligence (AI) to monitor trends. The LEDS will support this work by providing a more-readily available national datasets, informing the decision-making process and improve the overall provision to members of the public.*
- *Young people, especially from minority backgrounds, often feel targeted and misunderstood by police, leading to long-term distrust and disengagement. The Independent Office for Police Conduct (IOPC) has empowered a national Youth Panel of 35 young people (ages 16–25) to ensure young people voices shape policing policy and complaint handling.³⁴*
- *The National Police Chiefs’ Council (NPCC) has developed a comprehensive initiative called the Police Race Action Plan and subsequent Report in 2024,³⁵ which is their central policy framework for addressing race relations within policing in England and Wales. This includes the introduction of a Maturity Matrix. This is a tool for use by forces to assess their progress toward anti-racism across 14 key standards on both a qualitative and quantitative measures. This includes a data and performance framework to track improvements and set clear targets.*
- *LEDS users are required to abide by policies, procedures, code of practices and training on how to engage with members of the public and lawful and proportionate use of data. Disciplinary action could*

³⁰ [Police powers and procedures: Stop and search, arrests and mental health detentions, England and Wales, year ending 31 March 2024 - GOV.UK](#)

³¹ [A New Met for London: The Stop and Search Charter](#)

³² Published in **March 2023**, investigates the internal culture, standards of behaviour, and systemic issues within the Metropolitan Police - [Baroness Casey Review](#)

³³ [Stop and search | College of Policing](#)

³⁴ The **Independent Office for Police Conduct (IOPC)** has empowered a national **Youth Panel** of 35 young people (ages 16–25)

³⁵ [Police Race Action Plan update report - print](#)

follow where these have not been followed by users. The LEDS does not make use of facial recognition technology.

- *The LEDS does not appear to indirectly place people at a disadvantage because of their race.*

Religion or Belief

- *It may be possible to surmise the religion of a person held in LEDS where data is entered in the Occupation field as e.g. Missionary worker, Nun, Vicar. As a new service, LEDS will in future and as the sole System, be able to capture a wider breadth of religious occupations e.g. religious leader, Imam, Rabbi. This is regarded as sensitive data and users of LEDS are trained on how to lawfully and proportionately use this data.*
- *The LEDS does not appear to indirectly place people at a disadvantage because of their religion or belief.*

Sex

- *There have been a very small number of instances, where police officers and staff could potentially misuse their access to the data and led to them inappropriately identify people.³⁶ This behaviour more frequently involves Officers who have legitimate access to the data but exploit that position for a nefarious purpose. The reporting of this causes understandable anxiety and distress to the individuals concerned and society, resulting people less likely to trust the police and law enforcement.*
- *As a modern Service, LEDS fully meets and exceeds auditing requirements between all users as well as system-to-system activity. Where necessary, logs will be used by prosecution teams. All users have unique passwords, access to data is controlled by entitlements and users are required to provide both justifications and reasons for their access to the data. This has been established in section 62 of the DPA and LEDS will continue to comply with this requirement.*

All users must attend mandatory training prior to using LEDS to ensure lawful use of data and to ensure any data entered is not excessive or lead to any perceived disadvantages for the public. The training is immersive, and the service is intuitive and familiar across many governmental services. In addition, the statutory 2023 PNC/LEDS Code of Practice provides further public confidence in the legitimacy and integrity of information that is available and the purposes for which

³⁶ [Derbyshire officer 'used police database to find woman on Instagram' - BBC News](#)

this is used. It also introduced ten data principles all users must follow.³⁷

- *LEDS has also been certified to British Standards with BS10008. This provides even greater confidence as this certification sets the standards for the evidential weighting and legal admissibility of the Service. This means that its records are trustworthy and can be used as evidence.*
- *Users are fully trained on their use of LEDS data.*
- *The LEDS does not appear to indirectly place people at a disadvantage because of their sex.*

Sexual Orientation

- *The historical criminalisation of gay men, engaging in consensual activity, has recently been 'disregarded' by the Home Secretary.³⁸ Many of these convictions, cautions, warnings or reprimands were managed as physical documentation, recorded between the 1920s & 1960s. Where applicable, it will be the responsibility of the individual concerned to make a formal application via the Home Office.*
- *These records are kept in secure police storage and captured on Microfiche film. Over the years some of these Microfiche records have been Back Record Converted onto PNC.*
- *The NPCC are currently scoping options for the management of these data files, which includes backlog uploads onto LEDS.*
- *In PNC, markers such as 'Female Impersonator' and 'Male Impersonator' were created to describe a particular mode of operation where suspects deliberately disguise themselves, as the opposite sex to evade detection was misused. However, it was found that it had been used as a proxy marker for non-gender conforming or gay/lesbian individuals. The ambiguity of the terms means that it could be incorrectly used to describe someone who has or is transitioning to being male/female. To counter this, the marker was removed in all but historical contexts and LEDS will not use this marker. Instead, it will be replaced with 'Impersonates' to describe a perpetrator who, for example, disguises themselves as another gender.*
- *The LEDS does not appear to indirectly place people at a disadvantage because of their sexual orientation.*

³⁷ [Police National Computer and Law Enforcement Data Service: code of practice - GOV.UK](#)

³⁸ [Disregard process for convictions for decriminalised sexual offences \(consensual gay sex\) - GOV.UK](#)

Marriage and Civil Partnership

- *The LEDS does not appear to indirectly place people at a disadvantage because of their marriage and civil partnership status.*

Step 3: If you think that either no protected groups will be particularly disadvantaged, or if you think that there are some groups who will not be particularly disadvantaged, you should briefly state this. This is to demonstrate that regard has been had to all of the protected characteristics.

- *At the time of writing, there are no particular disadvantages envisaged by the introduction of LEDS to any protected characteristics.*

Step 4: If you have identified that any protected groups will be particularly disadvantaged, you must set out clearly what legitimate aim the proposed policy, position in guidance, or operational position proposed is targeted at. If you do not have a clear legitimate aim, the indirect discrimination will be unlawful. You must also clearly set out why the proposal is proportionate, including evidence that you have considered potential ways of mitigating against those disadvantages, including mitigations that you have considered but rejected.

- *The protected characteristics of age, race and gender recognition are the main areas currently under review by policing and is expected that at the conclusion each will bring about new legislation and /or policies. These will have a direct impact on Policing ways of working including on LEDS. As a result, LEDS will continue to be built as an adaptable modern service primarily for frontline policing. The maintenance of public safety will continue to be a legitimate aim for the development of LEDS, and new requirements will be implemented as directed by the Police.*
- *The below identifies mitigations against any potential disadvantages that could arise from LEDS:*

Missing person database (age):

LEDS is being designed to store people who are wanted (because they are missing (non-criminal) as well those who are wanted for law enforcement reasons. Previously both 'wanted' for criminal reasons and 'missing' data were captured together. The differentiation in LEDS ensures compliance with the Data Protection Act by mandating the separation of data for criminals and suspects from that of individuals not suspected of criminal activities. This distinction facilitates the application of appropriate retention periods more effectively.

The creation of a missing person's database means that better controls can be created so that data can be legally shared for safeguarding. LEDS offers greater opportunities for increased sharing between policing and other law enforcement organisations or agencies who support families of missing people, particularly when children are involved. For example, where children have been trafficked, or where they may be exploited for 'county lines' offences where children are often coerced into illegal activity by gangs.

- *The first LEDS Child's Rights Impact Assessment (CRIA) has now been published on gov.uk. This assessment was carried out in collaboration with the Children charities, LEDS product development & architectural teams as part of the assessment. The CRIA helped to broaden understanding and outlined recommendations regarding how children's data might be captured and stored and catalogue issues that might persist once LEDS is the sole Service. The recommendations in the CRIA is a key step towards building a picture of the detailed data values that might need to be addressed in future development.*

Inappropriate Use of Data:

- *The LEDS Audit Service will capture all LEDS activities conducted by a LEDS users. This service has been designed to continue to meet the logging compliance requirements of section 62 of Data Protection Act 2018.³⁹ This is specifically for use by trained organisational and national auditors and for investigation units such as Professions Services.⁴⁰ Whilst the legislative requirement to collect audit data only applies to Law Enforcement Processing, the LEDS Audit Service will capture all LEDS activity, regardless of which regime the processing relates to. Organisations Auditors will continue to undertake dip sampling of 1% of all LEDS transactions which may flag any inappropriate access by a user.*
- *In addition to the LEDS Audit Service, a Data Compliance Logging Service (DCLS) has also been developed to facilitate the capture of non-human interactions, e.g. system-to-system communication. This will support both internal and external investigations and provide an additional level of auditing requirements. Together the Audit and DCLS service offer the full view of user activity, should it be necessary.*
- *LEDS will allow users to add clarifications using free text, but this is limited to activities where it helps with data processing. To minimise the*

³⁹ The introduction of the Data (Use and Access) Bill 2025 removed the need for police officers to provide a justification every time they access or discloses someone's personal data.

⁴⁰ For example, the Independent Office for Police Conduct

risk of accidentally including discriminatory content, the word count in the free text field is limited to ensure only necessary information is included.

- *None of the 9 protected characteristics are held as a searchable criterion. There are data fields, that separately captures a person's sex, date of birth (age), race and prefix (sex, gender), a user cannot perform a search on this alone. They would form part of the records on a name search, where the data is held.*

Integrity of LEDS Data:

- *A Data Dictionary serves as a comprehensive repository of information about the data used in LEDS e.g. it helps to explain the purpose, origin and access conditions of data. It provides a centralised source of truth for understanding the meaning and context of data elements within LEDS. This in turn, aide the maintenance of data quality and helps ensure compliance with regulations by enabling traceability and facilitating auditability and governance.*
- *All LEDS development teams are required to meet the Web Content Accessibility Guidelines (WCAG 2.2). This relates to recommendations on how to make a web content more accessible to a wide range of people with disabilities. Although, it largely serves to enhance a user's experience, it serves to ensure that LEDS as a national service is aware of accessibility requirements. The standard is applied throughout the life cycle of this service to comply and before it is rolled out widely. As a modern service, LEDS is utilising technical and organisational tools to ensure the data is protected. These will be adaptable to meet the changing nature of law enforcement*
- *The Home Office already produces and publishes statistics in the form of commentary, tables and data on public safety including on numerous areas for Policing and their performance.⁴¹ The Office of National Statistics (ONS), UK Statistics Authority and police forces themselves also collate data. They provide insights into trends and patterns in criminality and victimisation. It is anticipated that LEDS, being a much more modern system, will facilitate the easier collation of data. This will likely impact policy and guidance, e.g. on stop and search and sex-based crimes.*
- *The Home Office and Policing are consciously ensuring that the design and use of LEDS are undertaken with equality in mind through application of a variety of policies, practices and procedures. For*

⁴¹ [Statistics at Home Office - Home Office - GOV.UK](#)

example, the Programme is undertaking a review of the terminology used within PNC to ensure it aligns to current data categorisation standards. LEDS design includes features such as dropdown boxes which eliminate the wide use of free text functionality. This constrains the range of answers, reduces human error and makes the collation of data easier.

- *The focus is on ensuring that proper practices and procedures are adopted, in particular, those that are able to create and make changes to the Service. This is facilitated through a higher user entitlement to the Service. The LEDS also promotes the adoption of good practices and procedures through its design. For example, users are asked to justify & provide reasons for accessing the Service, and where this is on behalf of another authorised users, this is also captured.*
- *LEDS will continue to evolve, in accordance with policing and law enforcement needs in pursuit of public safety. As decisions are made about the features and components for the Service, a suite of documentation will be published at regular intervals as part of an enduring function. This includes a Data Protection Impact Assessment (DPIA), an EIA and a CRIA.*

Section 3: Consideration of aim 2 of the duty: Advancing equality of opportunity between people who share a protected characteristic and people who do not share it.

You should consider here whether you think that the policy, position in guidance, or operational position you are considering will or will not deliver a less good outcome for those with a particular protected characteristic as compared to others, and if so whether steps can be taken to mitigate or avoid that outcome. Questions you may want to consider, although these will depend on context, include:

- Is there evidence that different groups have different needs that are relevant to the delivery of the policy/guidance/service? Does the proposal meet those needs?
- *Over the nearly 50 years PNC has been in service it has evolved to meet the needs of different groups. For example, for gender reassignment, the creation of the Gender Recognition Certificate marker after the Gender Recognition Act 2004 was enacted. Further guidance is expected in the coming months in this area.*

- *The categorisation of protected characteristics of race, has also evolved in recent decades because of a number of incidents. For example, police officers must capture a person's self-defined race classification, captured by local officers in their local systems. The use of expanded race codes, such as the ONS 18+1 race code as well as the capture of self-defined identity should be considered as a key backlog activity into LEDS once it becomes the sole service.⁴²*
- Have appropriate mitigations been considered to minimise any disadvantages?
- *During the first-phase, LEDS will largely replicate PNC's content and ways of working. Initially, both systems will work concurrently before PNC switch off. The development teams are maintaining a back-log catalogue of works to be undertaken once this switch-off has occurred. These include proposals to improve the usability of LEDS which means that users are less likely to make a mistake. There are also proposals to improve the impact of LEDS on the Protected Characteristic of age. In PNC a person's age remained static and did not increase over time, LEDS will seek to amend this, so it reflects a person's evolving age. This means that the needs of younger people, either as offenders or missing individuals, are managed as a vulnerable category in LEDS. For example, carrying out the agreed policy determination on the retention of the children's data.*
- Does the policy/guidance/service encourage people with particular protected characteristics to participate in public life or in other activities, particularly where participation by those groups is disproportionately low?
- *As a national service, LEDS is not intended to encourage people with protected characteristics to participate in public life, however it does offer a rich source of non-personal data for the purposes of research and statistical analysis. This activity enables improvement in the form of better policies and practices to be put in place, which in turn can help tackle prejudice and promote understanding between different groups.*
- *Access to LEDS is restricted to organisations who has lawful need for access to the data, in support of the public's protection. There are over 150 organisations, who have a range of restrictions based on proportionality of their access. Access is also controlled, with applicants going through the Police Information Access Panel (PIAP) for a thorough review process. If they are successful, they will be allocated the appropriate entitlements which limits the access to the data on a proportionate basis based on their business needs.*

⁴² refers to the standard for collecting and classifying ethnicity data in the UK

There are already well documented disadvantages to having a criminal record on individuals and whose data will be on LEDS, including employment barriers, travel restrictions, educations and licencing where there may be a limit to access to higher education or some professional licences. The law provides some mitigating functions to reduce these disadvantages.⁴³ The law prevents discrimination against individuals with spent convictions, for example individuals are not required to disclose spent convictions when applying for housing, mortgages, or rental agreements.

Section 4: Consideration of aim 3 of the duty: Fostering good relations between people who share a protected characteristic and persons who do not share it.

You should consider here whether you think that the policy, position in guidance, or operational position you are considering will or will not foster good relations between those with particular protected characteristics and those who do not share that particular protected characteristic. Questions you may want to consider, although these will depend on context, include:

- Will the policy/service/decision help to tackle prejudice and promote understanding between different groups?
- *As LEDS is a technical service, its development is relatively objective, though some subjective decisions have been required to create the content. These decisions adopt best practice approaches internal to the Home Office and NPCC as well as externally. The LEDS is designed to uphold legislation that promotes anti-discriminative practices and adheres to 'Privacy by Design' principle established in the DPA 2018.*
- *The processing in LEDS will be under the DPA 2018 and UK GDPR, both of which confer some data rights for individuals, which would include both adults and children. Children are less likely to be aware of or understand their rights under data protection legislation. A Data Protection Impact Assessment (DPIA) is an obligation arising from UK data protection legislation. One needs to be conducted where the prospective processing of personal data is likely to result in a "high risk to the rights and freedoms of individuals." It has identified privacy or information risks concerning the processing of personal data for individuals and applicable mitigations. This as well as the EIA and CRIA are available on the gov.uk web page and have specifically been written in clear, concise and accessible style. This was intended to assist younger people with their knowledge of LEDS.*

⁴³ Through the Rehabilitation of Offenders Act 1974 (ROA) and recent amendments under the Police, Crime, Sentencing and Courts Act 2022

- Might the policy/service/decision help to build better relationships between groups?
- *The Home Office and Policing are committed to ensuring that the design and use of LEDS are undertaken with equality in mind, through the application of various policies, practices, and procedures. Access to LEDS is restricted to organisations with a lawful need for access to the data, supporting public protection. LEDS ensures compliance with the Data Protection Act by mandating the separation of data for criminals and suspects from that of individuals not suspected of criminal activities. This could help minimise risks to individuals arising from both data processing as well as procedures applied by those public services. Better management of data can enhance understanding, prevent crime and address core issues relating to crime which could in the long term build better relationships between groups*
- How might the policy/service/decision be perceived by those who are disadvantaged by it, or by those who do not benefit from it?
- *The use of national policing systems, such as LEDS, in democratic societies is common and largely expected by all individuals, even those that are disadvantaged or do not benefit from it. It helps maintain a single point of truth and makes it easier for organisations and institutions, granted appropriate access, to carry out their responsibilities. Members of the public would expect personal, sensitive data to have the strongest protections guarding against inappropriate access to that data.*
- Might the policy/service/decision be considered as being favouritism or discrimination even if it is not?
- *As stated above, the protected characteristics of age, race and gender recognition are the main areas currently under review by policing and is expected that at the conclusion each will bring about new legislation and /or policies. The retention review, once approved, will also have to be applied to LEDS according to the outcome of the current review. These will have a direct impact on Policing ways of working including on LEDS. As a result, LEDS will continue to be built as an adaptable modern service primarily for to frontline policing. The maintenance of public safety will continue to a legitimate aim for the development of LEDS and new requirements will be implemented as directed by Policing.*
- Will the policy/service/decision cause people to “blame” another group for causing a problem/benefitting unfairly?
- *High-profile cases of police misconduct, including their abuse of power and discrimination, have significantly damaged public confidence increasing the likelihood of one group blaming another. In response to*

some of these concerns, in 2024, the Home Office introduced a ‘Plan for Change’.⁴⁴ It will instate dedicated neighbourhood policing teams throughout England and Wales with 13,000 additional neighbourhood officers by 2029. This forms a crucial part of the government’s broader’ aims to enhance public trust, by seeking to assign a named officer to every neighbourhood and reduce crime by increasing police visibility and engagement at the local level.

- *Despite these issues raised, the central focus of the National Policing Digital Strategy 2025–2030 is to equip Policing with the right tools and technology,⁴⁵ which aims to make policing more agile, transparent, and community-focused by 2030. This will be supported by the Crime and Policing Bill 2025 which supports the Governments Safer Streets Mission, by tackling anti-social behaviour, protecting workers and vulnerable people, as well as managing knife crime and weapons on the streets. LEDS will be instrumental in helping to achieve these aims.*

Section 5: Ongoing compliance with the PSED.

- *The LEDS is continuing to be developed as a data service and will work in parallel with the existing PNC until the latter is decommissioned. This is known as the two-way replication (2WR) process. This period will limit the number and degree of variations that can be applied, with a particular emphasis being on maintaining parity until LEDS is the sole operating system after PNC switch off, however development of LEDS design is ensuring it is compliant with the DPA 2018 and UKGDPR. The LEDS development teams are maintaining a list of crucial changes (Transformation Backlog), ready for when LEDS becomes the sole system. As a modern service, LEDS will be built to be fully adaptable to meet future legislative and regulatory change requirements as is expected by members of the public.*

You should set out here how you will demonstrate ongoing compliance with the PSED. In particular you should consider what steps you will take to collate evidence as to the impact the policy/position in guidance/operational process is having:

If you are unable to collate any relevant data or do not consider that this is necessary, you should clearly state why this is the case.

- *This EIA is the second iteration, with the first being published in 2024 and the assessment will be reviewed and updated annually.*

⁴⁴ [Plan for Change – Milestones for mission-led government](#)

⁴⁵ [policing-vision-2025.pdf](#)

- *The Considerations of PSED will continue to be incorporated into the LEDS design and processing of data.*
- *As mentioned above, there are outstanding reviews related to Policing's data management. which will impact the use of LEDS. Any decisions will be reflected in the next published version of this document.*

In all cases you should consider when you will next review the impact of the policy/position in guidance/operational practice and include a date for review in section 8.

Section 6: Section 55 duty (for immigration, asylum, and nationality considerations only).

- *Section 55 of the Borders, Citizenship and Immigration Act 2009 places a statutory duty on the Home Office and its partners, including law enforcement to ensure that its functions are carried out with regard to the need to safeguard and promote the welfare of children in the UK. This duty applies to all decisions and actions involving children, whether directly or indirectly. This duty aligns with the UK's obligations under the UN Convention on the Rights of the Child.*
- *The specific categories of children who are held in LEDS and may be affected are:*
 - *Children who are offenders or suspected offenders*
 - *Children who are victims of crime*
 - *Children who are deemed to be in danger of harm, including abuse, neglect, or exploitation*
 - *Children who are reported as missing*
 - *Children who are subject to court orders*
 - *Children who are subject to legal proceedings linked to adult prosecution*
 - *Children with a driving licence*
 - *Children recorded as the registered keeper of a vehicle*
- *The CRIA is a process that helps people understand how a proposed change and Compliance with the United Nations Convention on the Rights of the Child (UNCRC).⁴⁶ This is not a statutory requirement, in the same way as the Public Sector Equality Duty requires an Equality Impact Assessment but is good practice. The LEDS CRIA has helped identify which children's rights could be impacted by the new data service for policing and work towards ensuring the protection of*

⁴⁶ <https://www.gov.uk/government/publications/law-enforcement-data-service-leds-child-rights-impact-assessment>

children's rights within LEDS as the resulting entity. This initial CRIA has been initiated part way through the development process, but the impact assessment process will be absorbed into the design and development structures as an organic checkpoint. The CRIA has proposed 8 recommendations for the Programme and Policing to develop and implement after the period of 2WR has ended.

Section 7: Risks to vulnerable individuals and other groups (*if applicable).

Vulnerability is defined as a person in need of special care, support or protection because of their age, disability, risk of abuse or neglect. Due to the nature of Policing and the safeguarding responsibilities they undertake, means that they will encounter many vulnerable people on a daily basis. These may be temporary, re-occurring or permanent. The fact that a person is disabled does not automatically mean they are vulnerable. There are cultural and operational training reforms for Police Officers, including training on trauma-informed approaches, especially on domestic abuse and violence against women and girls. Officers also receive scenario-based training on de-escalation, safeguarding and community engagement. The LEDS will support their work supporting public safety.

There are also guidance and policies detailing the steps to take when dealing with a wide range of vulnerable people, including:

- *Sex workers⁴⁷*
- *Children & Young people⁴⁸*
- *Violence against Women and Girls⁴⁹*
- *Immigrant communities*

⁴⁷ <https://library.college.police.uk/docs/NPCC/Sex-work-national-police-guidance-2025.pdf>

⁴⁸ [Children and Young Persons Policing Strategy 2024 - 2027](#)

⁴⁹ <https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-for-delivery.pdf>