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Date: 10 June 2020

Dear Mr Sullivan,

I write in response to your Regulation 28 Report to Prevent Future Deaths following the inquest into the death of Miss Kellie Sutton. This was passed to me as the lead for safeguarding in the force and I apologise for the delay in returning a response.

To address the 'Matters of Concern':

- (1) That non-crime information valuable to the police in safeguarding potential victims of domestic abuse is not available as a national resource. It is still limited to individual police areas or groups of areas.

At the time of Kellie Sutton's death in August 2017, all non-crime data in Hertfordshire was held on a force specific standalone IT system called the Crime Investigation System (CIS).

The Police National Computer (PNC) was, and still is, the nationally used database which records a person's criminal record including impending prosecutions and arrests which result in no further action. It does not contain general intelligence information, non-crime data, or details of calls to police etc. In Hertfordshire all officers are trained to access PNC.

The Police National Database (PND) went live in 2011 to enable enhanced provision of information on a national basis. The PND has 3 strategic aims, namely;

- Protect Children and Vulnerable Adults
- Prevent Terrorism
- Prevent & Detect Crime, particularly Serious and Organised Crime.

Since 2011 the functionality of PND has been enhanced, with a desire to ensure better decision making to protect the public. The PND system is owned by Home Office Digital Data and Technology (HODDAT), it is recognised by the Home Office as 'National Critical Infrastructure'. The PND provides more investigative opportunities than PNC but access is restricted to licenced users and Hertfordshire has 180 of the 12000 nationally available licences. Whilst PNC will return an instantaneous result, PND requires a written application to be submitted to a licence holder. Immediate/threat to life requests

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can take up to 2 hours for a response to be received, however routine requests can take up to 7 days, therefore PND is assessed as a secondary investigative tool and would not generally be used at the scene of an incident. Since 2017 national governance around the utilisation of PNC has improved significantly but it is recognised that potential gaps still exist, especially in relation to frontline access.

In May 2018, Hertfordshire joined with eight other forces to share a common integrated crime and intelligence platform called Athena which replaced a myriad of independent legacy systems. Athena allows each force to access the other's intelligence, custody, crime and non-crime records, vastly improving our ability to safeguard the vulnerable and detect crime. Similar to PNC every officer has immediate access to Athena. The move to Athena was a significant and positive step and addresses some of your concern. However, it is accepted that although significant progress has been made there is still scope for more non-crime information to be available across force boundaries.

On a national level the Home Office through the National Law Enforcement Data Programme (NLEDP) has created the Law Enforcement Data Service (LEDS). LEDS will provide police and other law enforcement agencies with current and joined-up information - on demand and at the point of need - to help prevent crime and better safeguard the public. This work will, in due course, result in the decommissioning of the PNC and PND. The LEDS platform will hold the multiple existing data sets currently in the PNC and the PND for law enforcement to be accessed via a single interface. I am sure you will appreciate that the development of such a system is extremely complex and will take time to develop and implement but the potential is worth the investment.

The Codes of Practice for LEDS was published on 10th June 2020 for a 3 month consultation process and can be found here: https://www.college.police.uk/What-we-do/Standards/Codes_of_practice/Pages/Law-Enforcement-Data-Service.aspx. Hertfordshire Constabulary is fully committed to working towards the best opportunities for sharing data held by the police, and as part of our response to the consultation we will use the circumstances of Kellie Sutton's death and your observations to help influence the way NLEDS progresses.

Yours sincerely




Assistant Chief Constable

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