



**CAMBRIDGESHIRE CONSTABULARY**

**16 - 23 JANUARY 2006**

**POLICE NATIONAL COMPUTER  
COMPLIANCE REPORT**

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## 1. Executive Summary

### 1.1 Introduction

- 1.1.1 Her Majesty's Inspectorate of Constabulary (HMIC) conducted a Police National Computer (PNC) Compliance Inspection of Cambridgeshire Constabulary between 16<sup>th</sup> and 23<sup>rd</sup> January 2006.
- 1.1.2 The Constabulary was subject to a PNC Compliance Audit using the July 2005 Protocols on PNC Compliance. Her Majesty's Inspector would like to acknowledge the enthusiasm of the Force and also to place on record her thanks to all members of staff who contributed to this report and provided assistance during the inspection.
- 1.1.3 This report is based on views and comments obtained from strategic, PNC and customer level management and users at Force Headquarters and at 1 of the 3 Basic Command Units (referred to as 'Divisions'). These views have been supported by reality checks conducted by HMIC PNC Compliance Auditors (hereafter referred to as HMIC Auditors).

### 1.2 Background

- 1.2.1 Cambridgeshire is a medium-sized county, bordering East Anglia and the East Midlands, with a population of 716,000 residents and 297,000 households. The two major conurbations are Peterborough and Cambridge. While Peterborough is a significant city providing modern regional shopping attractions, it also has some wards that are amongst the most deprived in Europe. In addition, it has a significant visible ethnic minority (VEM) and youth population. Cambridge is noted internationally as a key tourist and education centre with a relatively young and affluent student population. Cambridgeshire also has substantive rural areas and local market towns, with approximately 13% of households in these areas. The national road network, namely the M11, A1 and the A14 in addition to the east coast main rail line, dissect the county. The county has some marked variations in prosperity and economy, with a technology and services focus and a range of substantial new residential developments with associated rapid growth in population. The southern half of the county in particular provides an affluent commuter belt, with expensive housing in Cambridge and the commuter villages.
- 1.2.2 The Force headquarters is located in Huntingdon. The Force area is divided into three territorial basic command units (BCUs) and following a restructuring in 2003, there are two non-territorial directorates: Safer Communities and Investigations.
- 1.2.3 The Force is headed by the Chief Officer Team comprising the Chief Constable, Deputy Chief Constable (DCC), an Assistant Chief Constables (ACC), a Director of Corporate Services, a Director of Executive Support and a Director of Finance and Contracts. The Constabulary employs 1462 police officers, 993 police staff and 200 Special Constables.

- 1.2.4 Looking now at PNC specifically, the creation of Arrest/ Summons records at Cambridgeshire is a manual process which requires the officer in case to telephone the Force's PNC Bureau (PNCB) with the details required to create a skeleton record on the PNC (the minimum amount of data required to create a new record). This is followed by the arresting officer completing a source input document (known locally as the '407') on the custody system. The 407 contains all the data required for a complete record on the PNC. The PNCB prints all the 407's daily from a custody system terminal located in the Bureau, they are then married up with the skeleton records and the PNCB conducts a daily audit to ensure that a 407 is received for all of the skeleton records which have been created. The PNCB provides a 24/7 service for the Force.
- 1.2.5 Magistrates and crown court results are received through the respective court systems, Equis and Xhibit, and are also updated by the court resulting team within the PNCB. The court registers are downloaded from Equis into a Lotus Notes database viewed on screen on Xhibit and the PNC is manually updated using the register information.
- 1.2.6 Disqualified Driver records, Wanted/ Missing updates, updates to vehicle reports and warrants cancellations on the PNC also are the responsibility of the PNC Bureau. The Bureau also provides telephone checks for officers and performs enhanced searches on the system, such as Vehicles On Line Descriptive Searches (VODS) and Queries Using Extended Search Techniques (QUEST).

### 1.3 Methodology

- 1.3.1 A full inspection against the 2005 PNC Protocols was carried out, covering the sections of Leadership, Policy and Strategy, People, Partnerships and Resources, Processes and Results.
- 1.3.2 The inspection was conducted over three stages with a final assessment being provided in line with the current HMIC Baseline Assessment grading structure of:
- **Excellent** – Comprehensive evidence of effective activity against all protocol areas.
  - **Good** – Evidence of effective activity in many areas, but not comprehensive.
  - **Fair** – Evidence of effective activity covering some areas, but concerns in others.
  - **Poor** – No or limited evidence of effective activity against the protocol areas, or serious concerns in one or more area of activity.
- 1.3.3 The first stage of the inspection involved the force providing HMIC Auditors with documentation to support its adherence to the protocols. This was followed up by a visit to the Force with HMIC Auditors conducting numerous interviews with key staff. The visit to the Force also incorporated the final stage of the inspection, which was based

upon reality checks. The reality checks included reviewing PNC data against source documents and a review of PNC policy documentation.

- 1.3.4 Using the evidence gathered during each stage of the inspection, this report has been produced based upon the European Foundation of Quality Management (EFQM) format.

#### **1.4 Current Performance**

- 1.4.1 On 27<sup>th</sup> April 2000, ACPO Council endorsed the ACPO PNC Compliance Strategy. The strategy is based upon the following four aspects of data handling:

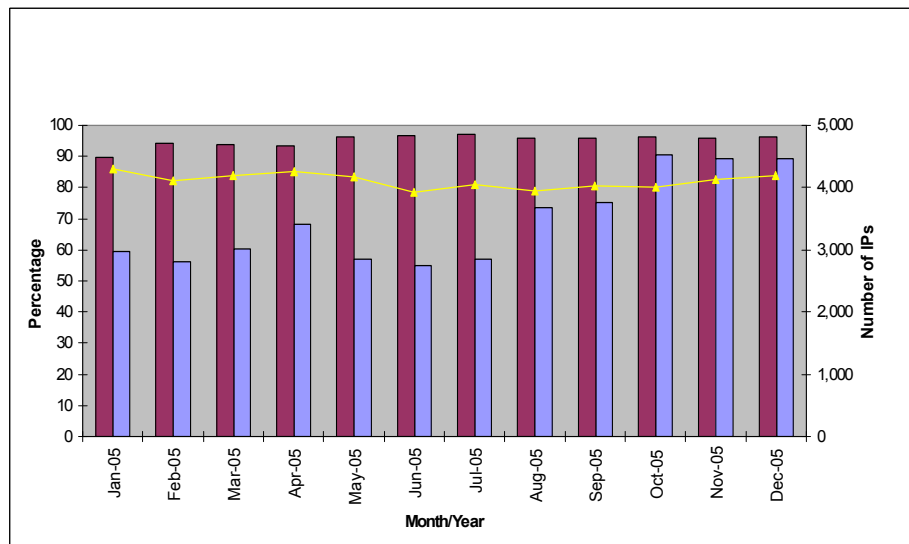
- Accuracy
- Timeliness
- Completeness
- Relevancy

- 1.4.2 The strategy is owned by ACPO but is also reliant on other partners taking responsibility for key actions within the strategy. The partners include Centrex, HMIC, Police Information Technology Organisation (PITO) and individual forces.

- 1.4.3 On 1<sup>st</sup> January 2005, the performance indicators of the ACPO Compliance Strategy were replaced by the timeliness standards contained within the newly published Code of Practice for the PNC. The PNC Code of Practice, developed by the National Centre for Policing Excellence and endorsed by ACPO, is a statutory code made under s.39a of the Police Act 1996 (inserted by section 2 of the Police Reform Act 2002). It provides scope for the Home Secretary to invoke statutory intervention for forces failing to comply. With regards to individual forces, a number of performance indicators (PIs) specifically for PNC data standards were set. Each force has a responsibility to achieve the standards set within the Code of Practice. The timeliness standards within the Code are as follows:

- 90% of recordable offences entered onto PNC within 24 hours of the commencement of proceedings. The commencement of proceedings being defined as when a person is arrested, reported or summonsed.
- 50% of all finalisations being entered onto PNC within 7 days of the information being received by the police. This target increased to 75% on 1 July 2005, six months after the commencement of the Code. (Courts have their own target of 3 days for delivery of data to the police. Therefore, the police are measured against an overall target of 10 days.)

- 1.4.4 In December 2005, Cambridgeshire input 96.1% of Arrest/ Summons (A/S) updates on PNC within 24 hours. This shows an improvement in performance in the 12 months to December 2005 from 89.8% in January 2005. It should be noted that the Force has achieved the 90% target every month since January 2005.
- 1.4.5 Cambridgeshire's performance in terms of court results has also shown improvement against the Code of Practice target. In January 2005 the Force entered 59.5% of results within 10 days of the court date. This has increased to 89.1% being entered within 10 days in December 2005. As a result the Force is achieving the target as set out in the Code of Practice in this area of activity.
- 1.4.6 In terms of Impending Prosecutions (IPs) Cambridgeshire has shown a decrease of 2.3% in the 12 months to December 2005. This shows that the Force is effectively managing its outstanding cases on the PNC.
- 1.4.7 A graph illustrating Cambridgeshire's performance in the 12 months to December 2005 is shown below:<sup>1</sup>



- 1.4.8 Whilst there remain areas of concern in relation to quality assurance, there can be no doubting the improvement evidenced by the force in relation to the timeliness of its data, where clear evidence of the energy being expended can be found across the organisation.
- 1.4.9 As supported by previous HMIC work, it is highly likely that this performance improvement has been enhanced significantly by the active role being taken by the Chief Officer team, in particular that of the Deputy Chief Constable who not only chairs the PNC Steering Group at a local level but has a key role in delivering PNC strategic development at a national level.

<sup>1</sup> Key: Purple columns indicate A/S performance, blue show court results performance and the yellow line shows the increase/ decrease in Impending Prosecutions.

## 1.5 Conclusions

1.5.1 HMIC's assessment of PNC compliance within the Force has been assessed as:

**Fair** – Evidence of effective activity covering some areas, but concerns in others.

1.5.2 This assessment is based on the detailed findings of the report which highlight concerns in some areas of activity. In particular, the Force needs to enhance its procedures to ensure data quality is maintained and to implement effective independent auditing to ensure that data protection issues are identified and addressed across the force and its data systems. These points were undoubtedly an inhibitor to the Force obtaining a better grading overall.

1.5.3 The recommendations of this report, as can be seen in Appendix A, aim to assist the force in overcoming the quality assurance issues discovered, further enhance security of the system at a local level, make improvements to the training on offer for PNC and to ensure that all relevant updates can be performed in a timely manner. Overall these recommendations build upon existing processes within the Constabulary and HMIC Auditors are encouraged by the Chief Officer's commitment to implement them without exception.

1.5.4 The findings of this report should read in conjunction with the previous reports and recommendations relating to the PNC. The previous reports are:

- Police Research Group Report – 'Phoenix Data Quality', *published 1998*
- HMIC Thematic Inspection Report – 'On The Record', *published 2000*
- HMIC Report – 'PNC Data Quality and Timeliness, 1<sup>st</sup> Report', *published 2001*
- HMIC Report – 'PNC Data Quality and Timeliness, 2<sup>nd</sup> Report', *published 2002*

1.5.5 A summary of good practice points, along with recommendations for improvement can be found at Appendices A and B of this report.

## 2. Detailed Findings and Recommendations

### 2.1 Leadership

#### 2.1.1 PNC Steering Group

2.1.1.1 At the time of inspection, Cambridgeshire had a PNC Steering Group (PSG) which meets on a quarterly basis and is chaired by the Deputy Chief Constable (DCC). Stakeholders from across the force are invited to attend the meetings and HMIC Auditors were provided with a documented terms of reference which clearly stated the objectives of the group and identified the key stakeholders invited to attend.

2.1.1.2 In addition, the Force has a core PSG, also chaired by the DCC which meets on a monthly basis between the full PSG meetings. There is also a PNC User Group, with a documented terms of reference, which meets quarterly and looks at PNC issues from an operational perspective. The chair of the User Group attends the core PSG meetings to ensure a communication flow between the strategic and operational discussions. This meeting structure is viewed as good practice by HMIC Auditors.

#### 2.1.2 Responsibility and Accountability

2.1.2.1 Cambridgeshire Constabulary has effective measures in place to ensure that late and poor quality information to be updated on the PNC is followed up by the PNCB with individual officers. HMIC Auditors obtained anecdotal evidence from officers confirming this process to be in place. In addition, monthly management information is produced outlining the performance of each Division in terms of the timeliness and quality of data submission. Each Division is required to provide an action plan for the PSG which enables any problems to be addressed at a senior level, where necessary. HMIC Auditors view this as good practice.

2.1.2.2 Further good practice was identified within the PNCB where dip sampling takes place of PNC updates. Team supervisors quality check the work of their staff and record the results of their checks. Whilst this process is viewed as good practice, the volume of dip sampling being conducted at the time of inspection was insufficient to ensure that data quality standards were being maintained. In particular, only 10% of Form 407 updates were being checked by supervisors. The data quality checks conducted by HMIC Auditors (discussed later in paragraph 2.5.5) suggest that this is insufficient with the result that update errors are going undetected on the system.

#### **Recommendation 1**

**Her Majesty's Inspector of Constabulary recommends that the Force increase the volume of dip sampling to ensure that data quality standards are improved.**

## 2.2 Policy & Strategy

### 2.2.1 PNC Policy and Strategy

2.2.1.1 At the time of inspection Cambridgeshire had a PNC Compliance Policy document which had been reviewed in October 2005. This was supplemented by a Position Statement which acts as a strategic action plan and is monitored at each PSG meeting. These two documents ensure that the Force gives 'ownership' of issues to individuals or departments and is proactive in its management of PNC.

### 2.2.2 PNC Security

2.2.2.1 With regard to system security, HMIC Auditors reviewed five key areas. These are User Access, Transaction Monitoring, Data Protection Auditing, the Role of Professional Standards and Information Security/Data Protection Training. Some good practices and some areas of concern were identified during the review and these are discussed further below.

2.2.2.2 Access to the PNC is managed by the PNCB manager with PNCB supervisors providing resilience. The Force has processes in place to ensure that a user is only given access to the system upon completion of a training course. There are also processes in place to ensure that all leavers have their access to the system removed. In addition, the PNC Manager conducts regular audits to determine users who have not been on the system for several months, with access being removed if appropriate. This is viewed as good practice by HMIC Auditors. However, the process could be improved by ensuring that those officers and staff on long term sickness absence and those who move within the Force have their PNC amended or revoked as necessary. Also whilst HMIC Auditors do not question the integrity of the work of the PNCB manager or supervisors, there is some risk to the organisation in having individuals able to make such changes to system access with no independent auditing of the activity being carried out.

#### **Recommendation 2**

**Her Majesty's Inspector of Constabulary recommends that Cambridgeshire:**

- **Introduces a process to ensure that officers and staff who are on long term sick leave or who move have their access amended or removed from the system as appropriate;**
- **Introduces an independent audit, at least annually, of all user access administration.**

2.2.2.3 Transaction monitoring is a requirement of the ACPO Data Protection Audit Manual. It is a process where police officers and staff are asked to verify their reasons for performing transactions on the PNC and, as such, is an important activity in the prevention and detection of misuse or abuse of the PNC. At Cambridgeshire this is a function of Data

Protection Unit who selects transactions at random daily and verifies their authenticity by checking to other Force systems, such as the Crime system. In addition, 3 transactions are selected for verification by the police officer or staff member. From January 2006 5 transactions per day were to be checked in this way. The individual who requested the check is asked via email to confirm that it was conducted for operational policing purposes and supporting documentation is requested. During focus groups, officers reported that this process would be more effective as a deterrent against PNC misuse/ abuse if the checks were requested more speedily. At the time of inspection, validations could be requested several weeks after the PNC check had been performed. However, HMIC Auditors were also informed that the Force plans to purchase the PNC Guard product which will enable real time validations to be requested and this should therefore resolve the timeliness issue.

- 2.2.2.4 Data Protection Audits are planned annually by the Data Protection Officer (DPO) at Cambridgeshire. The DPO performs an annual risk assessment of its IT data systems following which, decisions are made as to which systems are audited. This process complies with the ACPO Data Protection Audit Manual. However, HMIC Auditors were informed that whilst the planning process is undertaken, no data protection audits had been conducted on the PNC since 2001 with the exception of one requested audit in 2005 of stolen property. This was claimed to be due to resource issues.
- 2.2.2.5 In the current climate post Bichard Inquiry, it is imperative that forces ensure that data protection issues can be identified and rectified as a matter of priority.

### **Recommendation 3**

**Her Majesty's Inspector of Constabulary recommends that the Force ensures that sufficient data protection auditing is undertaken of the PNC as a matter of priority.**

- 2.2.2.6 HMIC Auditors also reviewed the role of the Professional Standards Department (PSD) with regard to PNC issues at Cambridgeshire. The PSD is independent of operational activities and has its own PNC trained operators and such independence is viewed as good practice. In addition, the Data Protection Officer has strong links with the PSD which ensures that PSD is notified of any breaches of system security. One area for improvement identified by HMIC Auditors is that the PSD only reacts to information received and does not perform any proactive monitoring of PNC transactions to enable potential misuse or abuse to be identified. It is therefore possible that the Force may be missing opportunities to detect system abuse and misuse.

**Recommendation 4**

**Her Majesty's Inspector of Constabulary recommends that the Force consider options for the proactive monitoring of PNC activity.**

2.2.2.7 Finally with regard to PNC system security, HMIC Auditors reviewed the role of the Information Security Officer (ISO) and Data Protection Officer (DPO) with regard to training. At present, training on DP and IS issues is delivered as part all PNC and IT training courses, by the Force's PNC accredited and IT trainers. The Force was in the process of implementing a Computer Based Training package and it was planned that this would be rolled out across the Force. HMIC Auditors would encourage the Force to progress this roll out and ensure that all police officers and staff undertake the new training package.

**2.3 People****2.3.1 Marketing and Awareness**

2.3.1.1 During meetings and focus groups, HMIC Auditors noted healthy levels of awareness among officers and staff of the PNC and its functionality as an aid to operational policing. In particular, knowledge of the VODS and QUEST functionality was good. There was also a good level of awareness by officers of the link between the completion of the '407' and PNC and their responsibilities to ensure that PNC records are kept complete, accurate and up to date.

2.3.1.2 The Force has a documented Marketing Strategy and expertise from the Force was being utilised in its development and implementation. The good levels of awareness and understanding are testament to the success of this approach.

**2.3.2 PNC Training**

2.3.2.1 PNC training was an area at Cambridgeshire where HMIC Auditors identified areas for improvement. The Force has three accredited PNC trainers, one of whom is dedicated to delivering PNC training. At the time of inspection, this was a situation being reviewed by the Force Training Manager and the PNCB Manager with a view to more accredited trainers being made available in the future. The current situation provides little resilience for the Force and in the past arrangements have been made with neighbouring forces and external companies to provide PNC courses. However, this has been done on an ad hoc basis and a more formalised arrangement with a neighbouring force would enable Cambridgeshire to deliver training to meet demand on an ongoing basis and would provide some resilience to the current arrangements.

- 2.3.2.2 At the time of inspection the Force had undertaken a great deal of work in developing a new role profile matrix approach in its training planning process. The new approach aims to ensure that officers and staff receive the appropriate training which they require to fulfil their duties, rather than applying for training in order to 'obtain a tick in the box' which has, in the past, caused delays for those who require courses. The training manager has developed this planning process in conjunction with the relevant business area managers, including the PNC Manager, to ensure that roles which require PNC access as a core element of their duties are given priority for training courses. This is viewed as a positive direction of travel by HMIC Auditors.
- 2.3.2.3 Good practices were identified in relation to PNC training which are worthy of note at this stage. It was pleasing that all course attendees are subject to a formal assessment prior to being given access to the PNC and the course content included data protection and information security issues throughout. In addition, refresher training is provided on request. The Force should consider mandatory re- assessment and/ or refresher training once additional PNC training resources are in place.
- 2.3.2.4 One point to be made in respect of PNC training is with regard to post training evaluation. The Force has some good practices in place with a "Happy Sheet" at the end of each course and training assessors attending courses on a regular basis to provide feedback to the trainers. This process could be enhanced by the evaluation of the effectiveness of training once it has been put into practice back in the workplace. HMIC PNC Compliance Auditors view the implementation of such an evaluation process to be good practice as it assists in improving training design and delivery. Furthermore, the Force needs to ensure that it conducts similar evaluation of courses provided by external providers in order to ensure that it is receiving value for money from such providers. Anecdotal evidence obtained by HMIC Auditors suggested that some PNC Courses provided by external providers had been of poor quality, with staff requiring subsequent re-training in order to have the skills to fulfil their duties.
- 2.3.2.5 In addition, the Force should ensure that staff and officers are aware of the ViSOR (Violent and Sexual Offenders Register) marker on the PNC and the procedure to be applied when a check is performed of an individual who is a ViSOR subject. Focus groups conducted by HMIC Auditors showed that knowledge of the marker and the procedure was limited to a few individuals and it is therefore possible that vital intelligence is being lost with regard to some of these more serious offenders.
- 2.3.2.6 Finally, the Force must satisfy itself that the PNC courses being delivered comply with national standards, as set out by Centrex. A review of the length of the courses currently on offer at Cambridgeshire showed that the courses are often less than the prescribed length. The Force must be satisfied that all the required content is receiving sufficient coverage on all its PNC courses.

**Recommendation 5**

**Her Majesty's Inspector of Constabulary recommends that the Force:**

- **Considers options available to provide resilience to the current PNC training arrangements to ensure that training needs can be met;**
- **Implements mandatory re-assessment for PNC operators with refresher training to be provided to any candidate who fails the re-assessment and;**
- **Enhances its training evaluation process to include the capture of comments once trainees have had the opportunity to implement the lessons learned. This should apply to all PNC courses and cover training delivered by external providers and;**
- **Ensures that all officers and staff are aware of the ViSOR marker on PNC and the procedures to be adopted when a check is performed on a ViSOR subject.**

**2.4 Partnerships and Resources****2.4.1 Relationship with the courts**

2.4.1.1 The Force has good liaison with its local courts through the Local Criminal Justice Board and the Local Criminal Justice Groups and also between individuals in the Force and at the courts. As a result, no issues were raised during the inspection with regard to this area of activity. Evidence of the effectiveness of this process can be seen in the Force's improved performance for updating court results on the PNC.

**2.4.2 Relationship with non police prosecuting agencies (NPPAs)**

2.4.2.1 With the introduction of the Code of Practice for PNC in January 2005, the target for the input of A/S records no longer includes those records which are updated as a result of an NPPA prosecution. However, there is still a need for forces to ensure that these records are updated in a timely manner to assist operational policing activity. This can only be achieved if forces encourage the NPPAs to provide complete, timely and accurate information for input to PNC. At Cambridgeshire, the force often first hears about an NPPA case when the court result is received. HMIC Auditors would therefore encourage the Force to introduce Service Level Agreements with its NPPAs to achieve this.

### 2.4.3 Relationship with other forces

2.4.3.1 HMIC Auditors would like to note the relationship which Cambridgeshire Constabulary enjoys with other forces, both locally and nationally. The Force has demonstrated its positive attitude to building such relationships with regard to PNC issues both locally, e.g. through its agreements with local forces for the provision of PNC training, and on a nationwide scale, by the DCC taking the national ACPO portfolio lead on PNC and a force representative leading on national PNC Training Matters. As a result, the Force has shown itself to be proactive in the PNC arena.

## 2.5 Processes

### 2.5.1 Creation and update of Arrest/ Summons (A/S) reports

2.5.1.1 On 1<sup>st</sup> January 2005, the performance indicators of the ACPO Compliance Strategy were replaced by the timeliness standards contained within the newly published Code of Practice for the PNC. The PNC Code of Practice, developed by the National Centre for Policing Excellence (NCPE) and endorsed by ACPO, is a statutory code made under s.39a of the Police Act 1996 (inserted by section 2 of the Police Reform Act 2002). The Code stipulates that 90% of recordable offences be entered onto PNC within 24 hours of the commencement of proceedings. The commencement of proceedings is defined as when a person is arrested, reported or summonsed.

2.5.1.2 Cambridgeshire Constabulary has achieved the Code of Practice target through its process of creating a skeleton record by telephone. However, HMIC Auditors noted a backlog within the PNCB for the update of the full record via the 407. At the time of the inspection, the backlog dated back to October 2005. The information contained within the 407 is important for the purpose of conducting effective QUEST searches on the PNC which may assist in a subsequent investigation. The Force was in the process of recruiting a temporary resource in order to clear this backlog of updates and it was intended that this person would remain in post until the Force is able to update the full PNC record directly from the custody system once the NSPIS product is implemented later in 2006. HMIC Auditors would urge the Force to continue to monitor the situation to ensure that the full record is updated on PNC in a timely manner.

### 2.5.2 Update of court information

2.5.2.1 The monthly performance statistics show that Cambridgeshire updates its court results in a timely manner and this area has seen improvements over the course of 2005. In addition, there is a process in place to ensure that all court bail conditions are updated promptly. The Force is to be commended for the work it has done to achieve the Code of Practice target.

- 2.5.2.2 However, HMIC Auditors noted that whilst the Force updates its records promptly, not all information is being updated on the PNC which could and should be captured. For example, remand histories and adjournments are not updated on the PNC. In addition, HMIC Auditors conducted reality checks by comparing 10 court results on the magistrates court system (Equis) to the PNC records. These checks highlighted the fact that the Force is not adopting the national procedure with regards to change of offence processing, known on the PNC as 'Refer to Court Case'<sup>2</sup>. As a result, some information which shows the history of a case is missing from the PNC. It is also worthy of note that in 20% of the 10 court results reviewed by HMIC Auditors the arrest/summons was still in skeleton format after the disposal information had been recorded. There is a risk that these records will remain as skeletons on the system.

**Recommendation 6**

**Her Majesty's Inspector of Constabulary recommends that Cambridgeshire Constabulary updates the PNC with all relevant information from the court registers and ensures that national standards are used for all PNC updates.**

- 2.5.3 Modus Operandi (MO) keywords
- 2.5.3.1 MO keywords are a parameter that can be used during a QUEST search. This is an important intelligence feature of the PNC, which can be used to identify possible suspects, particularly for serious offences, during a police investigation. It has been a requirement for several years that all forces must input MO keywords into the system to ensure that searches via QUEST cover the whole of PNC.
- 2.5.3.2 HMIC Auditors were encouraged that the Force had a procedure to capture and update this data and the PSG monitors the volume of MO keyword updates against its most similar forces. However, HMIC Auditors conducted reality checks to review 5 serious sexual offences which had been created by Cambridgeshire in 2004 and 2005. None of the cases reviewed had been keyworded and HMIC Auditors were informed that there was a 2 year backlog of records waiting for MO keywords to be updated. In addition, not all the offences reviewed had an MO attached to them. Such information may be of vital importance in a future investigation and should be updated, particularly in the most serious violent and sexual cases.

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<sup>2</sup> Refer to Court Case is used on the PNC when an alternative offence to that which was originally charged has been presented at court. The procedure enables a full history of proceedings to be shown on the offender's record.

**Recommendation 7**

**Her Majesty's Inspector of Constabulary recommends that the Force takes steps to clear the backlog of MO key wording and ensures that all relevant offences on the PNC are updated with an MO and, where appropriate, MO keywords.**

2.5.4 Ad hoc intelligence updates<sup>3</sup>

2.5.4.1 Cambridgeshire Constabulary had a process to identify any ad hoc intelligence updates on the PNC which arise from a Criminal Records Bureau check. This is viewed as good practice by HMIC Auditors. During the inspection HMIC Auditors identified an improvement to the existing process which would ensure that intelligence gathered by officers in the course of their duties would, where applicable, be captured for update on PNC. The new process involved a system change to the Force's existing intelligence system, Intrepid. HMIC Auditors were encouraged to learn that the system change was in place prior to the end of the inspection and that this would be communicated to officers for immediate implementation.

## 2.5.5 Data quality

2.5.5.1 HMIC Auditors conducted reality checks at Cambridgeshire to determine the quality of data being supplied by officers and subsequently input to PNC. This was achieved by obtaining 13 source input documents (form 407), reviewing their content and comparing the details submitted to the PNC record. HMIC Auditors were pleased to note that the information the officers were supplying was complete. In addition 40 vehicle reports were checked by HMIC Auditors on the PNC to ensure that they were complete and national standards were being applied.

2.5.5.2 HMIC Auditors were pleased to note that the vehicle reports reviewed were complete and complied with national standards. However, some concerns were raised with regard to data quality in relation to the update of arrest/ summons records and court results. First, there was a 54% error rate in the update of arrest/ summons information on the PNC. The errors varied from MO details being incomplete to facial hair being noted on the 407 but not updated on the PNC. HMIC Auditors believe that these errors can, in part, be attributed to the low level of dip sampling being conducted in the PNCB (as discussed earlier in paragraph 2.1.2.2).

2.5.5.3 Finally, HMIC Auditors noted that the dates being sent to PNC, which are used to calculate the timeliness statistics on a monthly basis, are not in accordance with the Code of Practice that came into effect on 1st

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<sup>3</sup> Information applicable for update to PNC that originates from a source other than the creation of an Arrest/ Summons report.

January 2005. The Code states that the measurement for timeliness is from the 'commencement of proceedings' which is when a person is either arrested or reported for a recordable offence. At Cambridgeshire the time and date of the decision (e.g. to charge/ bail/ release) by the custody officer is input on PNC. None of the cases reviewed would have affected the overall statistical performance of the Force, however, new legislation means that there is a growing number of cases within the force where a custody extension is required to obtain more evidence before making a decision. In these cases, despite a potential three day delay in making a decision, the performance of the force would be unaffected because the time and date recorded on PNC would still be the decision time, giving the impression that the target had been met.

**Recommendation 8**

**Her Majesty's Inspector of Constabulary recommends that the Force develops its quality assurance processes to ensure the integrity of PNC updates.**

**2.5.6 Warrants management**

2.5.6.1 Warrants management is the responsibility of the local warrants officers who are based at each of Cambridgeshire's divisions. The warrants officers are responsible for managing the physical warrants (i.e. the paperwork) and for notifying the PNC Bureau of any which require circulating on the PNC and for the cancellation of existing warrants on the system.

2.5.6.2 Anecdotal evidence obtained during the inspection, from police officers and staff, suggests that the current system is working well, with no problems noted. However, HMIC Auditors have only this anecdotal assurance as no data protection audits have been conducted of the Wanted/ Missing files on the PNC since 2001. The re- introduction of data protection auditing at Cambridgeshire would provide both the Force and HMIC Auditors with substantive assurance that process works well.

**2.5.7 PNCB work allocation**

2.5.7.1 At the time of inspection, HMIC Auditors reviewed the work allocation and process within the PNCB at Cambridgeshire. Staff are required to undertake a number of tasks simultaneously, for example updating the 407 information and answering the telephone to conduct VODS or other complex searches for police officers. As a result, there are backlogs in PNC updates and input errors are being made, as shown by the data quality checks. HMIC PNC Compliance Auditors are of the view that benefits can be obtained if individual tasks are assigned to different people, ensuring that each task receives the same level of work in a single day. In order to reduce the risk of the PNCB becoming monotonous, responsibility for tasks can be assigned on a rotational

basis. Rotation of the tasks will not only provide benefits in completing outstanding work but it will also improve the skills of staff enabling them to work quickly and accurately. Furthermore, HMIC Auditors believe that some tasks, such as VODS searches, could also be undertaken by other departments, such as the Communications Room, which would further ease the burden on the PNCB whilst maintaining the current service levels to officers.

#### **Recommendation 9**

**Her Majesty's Inspector of Constabulary recommends that the Force reviews its current work allocation in the PNCB to determine whether changes to the current system would improve data quality and minimise the risk of backlogs developing whilst still providing the level of support required for officers.**

## **2.6 Results**

- 2.6.1 In December 2005, Cambridgeshire input 96.1% of Arrest/ Summons (A/S) updates on PNC within 24 hours. This shows an improvement in performance in the 12 months from 89.8% in January 2005. However, for forces that create skeleton records on the PNC update of the full record in a timely manner is required in order to comply with principles 3 and 4 of the Data Protection Act. HMIC Auditors conducted reality checks and subsequent discussions, highlighted the fact the Force has a backlog of updates to PNC (to October 2005). HMIC Auditors believe that the previous ACPO PNC Compliance Strategy target of 5 days is a guide to satisfy the legislation.
- 2.6.2 Cambridgeshire's performance in terms of court results has shown improvement against the Code of Practice target. In January 2005 the Force entered 59.5% of results within 10 days of the court date. This has increased to 89.1% December 2005.
- 2.6.3 Finally, with regard to outstanding prosecutions on the PNC in the 12 months to December 2005 the Force has shown an overall decrease of 2.3%. In April 2001, HMIC supported by the Home Secretary stated that all forces should be in a position to confirm that any outstanding case that is over twelve months old, is legitimately outstanding. In Cambridgeshire's case, this accounts for approximately 5% of all their outstanding prosecutions. HMIC Auditors are therefore assured that the Force is able to provide such confirmation.

**APPENDIX A – SUMMARY OF RECOMMENDATIONS FOR CAMBRIDGESHIRE****Recommendation 1**

Her Majesty's Inspector of Constabulary recommends that the Force increase the volume of dip sampling to ensure that data quality standards are improved.

**Recommendation 2**

Her Majesty's Inspector of Constabulary recommends that Cambridgeshire:

- Introduces a process to ensure that officers and staff who are on long term sick leave or who move have their access amended or removed from the system as appropriate;
- Introduces an independent audit, at least annually, of all user access administration.

**Recommendation 3**

Her Majesty's Inspector of Constabulary recommends that the Force ensures that sufficient data protection auditing is undertaken of the PNC as a matter of priority.

**Recommendation 4**

Her Majesty's Inspector of Constabulary recommends that the Force consider options for the proactive monitoring of PNC activity.

**Recommendation 5**

Her Majesty's Inspector of Constabulary recommends that the Force:

- Considers options available to provide resilience to the current PNC training arrangements to ensure that training needs can be met;
- Implements mandatory re-assessment for PNC operators with refresher training to be provided to any candidate who fails the re-assessment and;
- Enhances its training evaluation process to include the capture of comments once trainees have had the opportunity to implement the lessons learned. This should apply to all PNC courses and cover training delivered by external providers and;
- Ensures that all officers and staff are aware of the ViSOR marker on PNC and the procedures to be adopted when a check is performed on a ViSOR subject.

**Recommendation 6**

Her Majesty's Inspector of Constabulary recommends that Cambridgeshire Constabulary updates the PNC with all relevant information from the court registers and ensures that national standards are used for all PNC updates.

**Recommendation 7**

Her Majesty's Inspector of Constabulary recommends that the Force takes steps to clear the backlog of MO key wording and ensures that all relevant offences on the PNC are updated with an MO and, where appropriate, MO keywords.

**Recommendation 8**

Her Majesty's Inspector of Constabulary recommends that the Force develops its quality assurance processes to ensure the integrity of PNC updates.

**Recommendation 9**

Her Majesty's Inspector of Constabulary recommends that the Force reviews its current work allocation in the PNCB to determine whether changes to the current system would improve data quality and minimise the risk of backlogs developing whilst still providing the level of support required for officers.

**APPENDIX B – SUMMARY OF GOOD PRACTICES AT CAMBRIDGESHIRE**

- The Force has a meeting structure in place to ensure that PNC issues are addressed at the strategic, tactical and operational levels.
- Each Division is required to produce an action plan addressing PNC issues to the quarterly PNC Steering Group.
- Desk top transaction monitoring checks are used in addition to those requiring officers to provide evidence of the reason for a PNC check.
- The Force has a documented Marketing Strategy for PNC and has utilised expertise in the force to ensure that it is effectively developed and implemented.

**APPENDIX C – ‘ON THE RECORD’****THEMATIC INSPECTION REPORT ON POLICE CRIME RECORDING, THE POLICE NATIONAL COMPUTER AND PHOENIX INTELLIGENCE SYSTEM DATA QUALITY - RECOMMENDATIONS****Recommendation 9** (Chapter 5 page 86)

Her Majesty's Inspector recommends that all Forces produce position statements in relation to the 1998 PRG report recommendations on Phoenix Data Quality and the ACPO Compliance Strategy for the Police National Computer. He further recommends that Forces produce a detailed action plan, with timescales, to implement their recommendations. The position statements and action plans together with progress updates should be available for audit and inspection during future HMIC PNC Compliance Audits and inspection of Forces. Forces should send copies of action plans to HMIC's PNC Compliance Audit Section by 1 February 2001.

**Recommendation 10** (Chapter 6 page 104)

Her Majesty's Inspector recommends that Forces urgently review their existing SCAS referral mechanisms in the light of the above findings. These reviews should include verification with SCAS that all Force offences fitting the SCAS criteria have been fully notified to them, and updated. This process should be managed by Forces through their in-Force SCAS Liaison Officers.

**Recommendation 11** (Chapter 7 page 111)

Her Majesty's Inspector recommends that the marketing, use and development of national police information systems is integrated into appropriate Force, local and departmental, strategic planning documents.

**Recommendation 12** (Chapter 7 page 112)

Her Majesty's Inspector recommends that where not already in place, Forces should establish a strategic PNC Steering Group. This group should develop and be responsible for a strategic plan covering the development, use and marketing of PNC and Phoenix.

**Recommendation 13** (Chapter 7 page 118)

Her Majesty's Inspector recommends that all Forces conduct an audit of their present in-Force PNC trainers to ensure they have received nationally accredited training. Any individuals who have not been accredited as PNC trainers by National Police Training should not conduct in-Force PNC training.

**Recommendation 14** (Chapter 8 page 145)

Her Majesty's Inspector recommends that Forces ensure that each Phoenix inputting department develops an audit trail to register the return of substandard PSDs, via line supervisors, to originating officers. The system developed should include a mechanism to ensure the prompt return of PSDs. Forces should also incorporate locally based audit trails, monitoring the passage of returned PSDs between line supervisors and originating officers.

**Recommendation 15** (Chapter 8 page 146)

Her Majesty's Inspector recommends that Forces develop clear guidelines to cover their expectations of officers on the return of incomplete or substandard PSDs. This guidance should be communicated to all staff and regular checks conducted to ensure compliance.

**Recommendation 16** (Chapter 8 page 148)

Her Majesty's Inspector recommends that Forces should develop a system to ensure that all ad-hoc descriptive and intelligence updates registered on local Force systems are automatically entered onto the Phoenix system. The policy should clearly outline whose responsibility it is to notify Phoenix inputters of any descriptive changes. Forces should also ensure that the policy is marketed to staff and that regular checks are conducted to ensure compliance.

**Recommendation 17** (Chapter 8 page 150)

Her Majesty's Inspector recommends that Forces develop a formal system to ensure that a proportion of each member of Phoenix inputting staff's work is regularly checked for accuracy. Forces should also consider the benefits of measuring other aspects of their work including speed of entry and compliance with policies. Performance outcomes should be evidenced in staff PDRs.

**Recommendation 18** (Chapter 9 page 164)

Her Majesty's Inspector recommends, where not already present, that Forces develop risk assessed Force Data Protection Officer audit programmes.

**Recommendation 19** (Chapter 9 page 164)

Her Majesty's Inspector recommends that Forces integrate PNC and Phoenix data quality compliance into their performance review and inspectorate programmes for BCUs and specialist departments.

**Recommendation 20** (Chapter 9 page 165)

Her Majesty's Inspector recommends that PSD performance statistics should be incorporated in routine Force performance information. The statistics should identify omissions and errors in individual fields, in particular, descriptive information. Appropriate accountability measures should be established to ensure that any performance shortfalls identified are addressed.

**APPENDIX D – PRG REPORT****“PHOENIX DATA QUALITY” RECOMMENDATIONS**

- National performance indicators and standards for timeliness of input, data fields to be completed, quality assurance requirements and the provision of training should be agreed by ACPO and promulgated to all Forces.
- Achievement against and compliance with these indicators should be audited after a period of 12 months, perhaps through the inclusion in the scope of HMIC audits.
- Senior officers take an active and visible role in policing compliance with agreed standards within their own Force.
  - ACPO performance indicators should be reflected in Force policy or standing orders (or the Force equivalent). Guidance should include the responsibilities of officers at each stage of the process e.g. for the provision of source documentation, for approval, time taken to pass to input bureaux, and the bureaux' responsibilities for data entry and quality control.
  - Line and divisional managers, as well as chief officers, should be held accountable for compliance with these standards. This could be achieved through inclusion in divisional efficiency assessments, and through the publication and dissemination of performance statistics throughout individual Forces and nationally.
- Source documentation should be common across all Forces, if not in design, in the information requested. A national format, stipulating a hierarchy of fields to be populated, should be developed.
- Programme(s) geared to raising awareness amongst operational officers and line managers of the potential benefits of Phoenix in a practical sense and their responsibilities of the provision of data should be developed. To ensure all officers have an opportunity to benefit from these programmes, consideration should be given to inclusion of a 'Phoenix awareness' module in probationer training, promotion courses and divisional training days.
- Best practice in administrative arrangements and organisational structures should be widely distributed. Internal working practices and organisational structures should be streamlined to remove any redundancies.

- Greater computerisation of the transfer of results from courts direct to Phoenix should continue to be developed. In the shorter term, the Police Service is likely to retain responsibility of the input of court information. To minimise the resource burden on the Police Service in this interim period, the police and courts should work to ensure recognition of each other's requirements and to minimise any inconsistencies in their respective working practices.
  - In the first instance, this might be achieved by ACPO highlighting to Magistrates' Courts and to the Crown Court, perhaps through the Trials Issue Group, the importance of Phoenix records to the integrity of the criminal justice system as a whole. Liaison meetings could usefully be established to introduce greater consistency in working and recording practices between the courts and police Forces e.g. for recording data. In the first instance, this could be pursued locally, perhaps through the court user group. Issues considered by such meetings might include supplying additional information (such as Arrest / Summons numbers) to the Magistrates' Court system and to automated transfer of court registers.
  - Consistent practice and performance is also required from the courts. Recommendations referring to performance indicators and standards, audits and monitoring, senior level commitment, common recording practices, awareness of system customers and administrative 'best practice' could equally apply to the courts. Mirroring the responsibilities of Chief Constables for their Force, the Court Service and the Magistrates' Court Committee should be accountable for the performance of courts.
  - Consistent practice in advising custody details, including transfers and releases, is required. This includes consistency in advising CRO numbers to maximise the number of complete records. The police and prison services should liaise to encourage greater understanding and acknowledgement of each other's requirements.

**APPENDIX E – 1<sup>ST</sup> PNC REPORT****POLICE NATIONAL COMPUTER DATA QUALITY AND TIMELINESS –  
RECOMMENDATIONS****Recommendation One (Paragraph 5.2)**

Her Majesty's Chief Inspector recommends that ACPO nationally review the position and priority of PNC within the structure of portfolio holders to reflect both the technical and operational importance of PNC.

**Recommendation Two (Paragraph 5.11)**

Her Majesty's Chief Inspector draws renewed attention to Recommendations 11 to 20 of *'On the Record' (2000)*, and recommends that all forces develop appropriate systems, overseen at a senior level, to ensure that they are implemented.

**Recommendation Three (Paragraph 5.19)**

Her Majesty's Chief Inspector recommends that PITO review, as a matter of urgency, the supplier/customer relationship between PNC and forces, particularly in relation to the marketing of PNC functionality, and the type, frequency and validity of management information reports produced.

**Recommendation Four (Paragraph 5.29)**

Her Majesty's Chief Inspector recommends that Her Majesty's Inspector (Training), in consultation with PITO and National Police Training, conducts a review of the quality and availability of accreditation training for PNC trainers and the extent to which they are subsequently employed in forces.

**Recommendation Five (Paragraph 5.31)**

Her Majesty's Chief Inspector recommends that discussions take place between ACPO, PITO and other relevant stakeholders to examine what opportunities exist for a short term 'technology solution' for the inputting of Court Results, either involving NSPIS applications currently in development, or an interim solution.

**Recommendation Six (Paragraph 5.34)**

Her Majesty's Chief Inspector recommends that renewed and re-invigorated discussions should take place between relevant stakeholders to, (a) Ensure that local systems are in place to maximise co-operation with the courts to achieve their respective 72 hours targets and, (b) Work towards Magistrates' Courts and Crown Courts assuming full responsibility for inputting all case results directly onto PNC.

**Recommendation Seven (Paragraph 6.10)**

Her Majesty's Chief Inspector recommends that following appropriate consultation with relevant stakeholders, a national inspection protocol for PNC data quality and timeliness be introduced.

**Recommendation Eight (Paragraph 6.12)**

Her Majesty's Chief Inspector recommends, that following appropriate consultation with relevant stakeholders, the Secretary of State should consider using his powers under Section 5 of the Local Government Act 1999, to require all police authorities to institute a Best Value Review of processes to ensure PNC data quality and timeliness. Such review should be conducted against a common template and terms of reference.

**Recommendation Nine (Paragraph 6.14)**

Her Majesty's Chief Inspector recommends, that in consultation with the Standards Unit and other stakeholders, HM Inspectorate should urgently review their current PNC audit responsibilities in the light of the findings of this report, with a view to adopting a more proactive stance in relation to force performance, data quality and timeliness.

**Recommendation Ten (Paragraph 6.16)**

Her Majesty's Chief Inspector recommends, that in consultation with other stakeholders, ACPO IM Committee initiate research with a view to encouraging mutual support between forces for out of hours PNC data entry purposes.

**APPENDIX F – 2<sup>ND</sup> PNC REPORT****POLICE NATIONAL COMPUTER DATA QUALITY AND TIMELINESS –  
RECOMMENDATIONS****Recommendation 1**

The Home Office should lead and co-ordinate an urgent re-examination of the current PNC strategy and standards with a view to producing national binding performance and compliance criteria to which all relevant stakeholders and partners are agreed and committed.

**Recommendation 2**

ACPO nationally and Chief Constables locally must ensure that the national standards for PNC operation, resourcing and training are fully integrated into local Information Management Strategies and recognised as an important part of operational service delivery. This area must receive sustained high-level support through a 'champion' at chief officer level.

**Recommendation 3**

PITO should be tasked to consolidate the force 'profiling' approach as used in the inspection into the routine statistical returns provided to forces. PNC statistics should then be integrated into the mainstream suite of management information/indicators that inform decisions at force and BCU levels.

**Recommendation 4**

HMIC should be tasked to establish a risk-assessed programme of monitoring and inspection that is able to respond quickly and effectively to deviations from accepted standards. This programme should include;

- remote monitoring of performance (PITO profile statistics)
- regular collaboration and contact with force PNC Managers
- proportionate programme of visits and inspections
- targeted interventions to respond to identified problems

**Recommendation 5**

The Home Office should establish a structured process for addressing and remedying any significant and persisting deviation from the agreed national standards (see Recommendation 1). This process should identify the respective roles of HMIC, Police Standards Unit and police authorities. It should set out the escalation of responses, which might include an agreed action plan, re-inspection, Intervention, and ultimately withdrawal of facility.