

PNC Re - inspection – Feedback Matrix

Force: City of London
Date of Original Report: August 2005

1. Background

- 1.1** It was agreed by HMIs that the forces receiving a grading of poor in the first round of PNC inspections would receive a focussed re-inspection to include scrutiny of the progress or compliance with the recommendations from the initial report.
- 1.2** The initial inspection took place in August 2005, since that time the force has worked towards implementation of all recommendations from the report.
- 1.3** There was evidence that a member of the Command Team maintains oversight of business change processes impacting upon PNC with a chief inspector managing the project. Using the 'Lanner Witness' process modelling software the force has identified short and longer term business goals and is working towards them.
- 1.4** Her Majesty's Inspector would like to acknowledge the enthusiasm of the force and also to place on record his thanks to all members of staff who contributed to this report and provided assistance during the re-inspection.

2. Current Position

- 2.1** The City of London Police has not consistently achieved the ACPO target of entering 90% of arrest summons reports within 24 hours¹. Between September 2006 and September 2007, the force only achieved the target in September 2007. However from the low of 74.6% in December 2006 the force has consistently improved, in the view on HM Auditors this statistical profile is indicative of processes being refined.² Whilst this performance data makes positive reading the force must acknowledge that whilst timeliness is being achieved, it must also strive to ensure that all records are complete and accurate.
- 2.2** With regards to court results, performance has been consistently good with the target of 75% of disposals being entered onto PNC within 10 days being achieved in all but two of the twelve months to September 2007. The target is normally achieved in seven days. The consistent achievement of this target indicates good business processes helped in part by the relatively small number of cases and the size of the force.
- 2.3** The final area that is considered in this part of the report is that of impending prosecutions (IPs). In the 12 months, the number of IPs has increased by 10% from 1,261 in October 2006 to 1,408 in October 2007.

¹ Excluding Non-Police Agencies

² This improvement has continued during the preparation of this report. 90% having been achieved October to December 2007

3. Conclusion

3.1 The re-inspection concentrated on the recommendations of the previous report from August 2005. The previous grading structure was used to provide a final assessment:

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.

3.2 HMIC's assessment of PNC compliance within the force is **Fair**.

3.3 This assessment is based upon The City of London Police's response to the recommendations in the previous report which are detailed below.

3.4 The force has responded positively to the recommendations of the original report, many of which have been incorporated into new working practices. The move towards the development of a PNC Bureau which can be the central point of reference/centre of excellence is a good initiative. Recommendations in relation to marketing and user access have been met in full. The passionate commitment to data quality by the full time inputting staff is commendable.

3.5 HMIC Auditors are concerned that the force is still not auditing to the ACPO standards. Although the commitment to quality by the inputting staff should ensure that the data quality is of the required standard, there will be glitches in business processes resulting in out of date or simply incorrect data being entered onto or remaining on PNC. Good, risk based auditing will protect the force from the adverse consequences of such data.

3.6 However, despite the grade, HMIC are reassured that the current regime within the force can demonstrate the drive and ability to improve further.

February 2008

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1	<p>Her Majesty’s Chief Inspector of Constabulary recommends that the Force develops and reacts to performance management processes and information in relation to PNC data quality and timeliness.</p>	<p>Achieved</p>	<p>Performance is reviewed at the PNC Steering Group chaired by a chief officer.</p>	
2	<p>Her Majesty’s Chief Inspector of Constabulary recommends that the Force formally documents a strategy for PNC. The document should be supported by an action plan covering the recommendations of this report and any previous HMIC reports where no or limited progress has been made.</p>	<p>Achieved</p>	<p>There is now a PNC Strategy and a current Action Plan overseen by PNC Steering to deliver the recommendations detailed in the original report.</p>	
3	<p>Her Majesty’s Chief Inspector of Constabulary recommends that CoLP:</p> <ul style="list-style-type: none"> • Introduces a process to ensure that movers and leavers have their access amended or removed from the system as appropriate; • Introduces an independent audit, at least annually, of all user access administration. 	<p>Achieved in Part</p>	<p>Movers and leavers are updated by reference to the weekly orders. All users are reviewed every 90 days. Training Department have recently undertaken a review of user groups and reduced the access enjoyed by a number of staff where it was not required.</p> <p>At the time of the re-inspection there was no independent element overseeing the management of access to PNC.</p> <p>The force have indicated that a process is to be introduced whereby trainers audit the user database and produce a</p>	

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			<p>report for the attention of the Information Access Manager in Professional Standards Department (PSD). This will give the required independent overview.</p> <p>Recommendation: Her Majesty's Chief Inspector of Constabulary recommends that the force follow through its current initiative and introduce an independent element into the authorisation of PNC access.</p>	
4	<p>Her Majesty's Chief Inspector of Constabulary recommends that the Force reviews its transaction monitoring procedures to ensure that a robust process is in place to detect misuse/ abuse of the PNC.</p>	Achieved	<p>The force still undertakes dip sampling in the control rooms at the rate of three transactions per shift. The automated transaction checking application PNC Guard has recently been taken into use. The first point of contact for following up transaction queries is the chief inspectors on the BCU this is good practice. PC Guard reports will be monitored by PSD. There are currently six enquiries on-going in relation to PNC access; none of these are as a result of transaction monitoring.</p>	
5	<p>Her Majesty's Chief Inspector of Constabulary recommends that the Force:</p> <ul style="list-style-type: none"> • Ensures that sufficient data protection auditing is undertaken of the PNC; • Ensures that individuals with 	Not Achieved	<p>Despite the fact that auditing took place of arrest summons in Dec' 06, auditing in general is poor with none being done on a formal basis (i.e. with report and recommendations) since the last inspection. The force has produced a risk based audit plan but the risk</p>	

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	<p>responsibility for auditing have an up to date knowledge of national policies and procedures for PNC.</p>		<p>assessment only takes account of PNC data. The force does not have an audit plan that has risk assessed all information systems.</p> <p>Even with the limited audit plan, the Information Access Manager and PSD stated that they are unlikely to have the resources to ensure that issues identified in the plan are met.</p> <p>It is a matter of some regret that the force has worked hard to address the issues in the original report and yet not addressed and resourced this fundamental issue.</p> <p>Recommendation: Her Majesty’s Chief Inspector of Constabulary recommends that the force develops, resources and implements a comprehensive risk assessed audit plan for all data as a matter of urgency.</p>	
<p>6</p>	<p>Her Majesty’s Chief Inspector of Constabulary recommends that the Force updates its System Security Operating Procedure to include a section on the PNC.</p>	<p>Achieved</p>	<p>Two issues were addressed prior to this recommendation:</p> <p>PSD should have PNC trained staff within the department with the necessary skills to carry out their own investigations.</p>	

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			<p>The PNC Security Policy should be updated and subject to regular review.</p> <p>Both requirements have been met.</p>	
7	<p>Her Majesty’s Chief Inspector of Constabulary recommends that the Force publishes and implements a Communication Strategy to raise awareness for the effective use of PNC across the Force.</p>	<p>Achieved</p>	<p>A phased plan for delivering different marketing solutions has been drawn up and delivered with a review to take place upon completion of this re-inspection.</p> <p>This has delivered considerable improvements in this area with some imaginative initiatives. To encourage members of staff to read the information posted on the force intranet, a quiz was held with a £50 prize based on QUEST, VODS and VISOR information.</p> <p>‘In-Force’ the force publication has been used extensively to promote PNC and PNC procedures. Numerous schemes run in conjunction with the Commissioners GIRFT (Getting it right first time) initiative were shown to HM Auditors by the Corporate Communications Manager. ‘Drip feeding’ information in this way has had its benefits with the focus group displaying a good awareness of the facilities that PNC provides.</p> <p>This demonstrates the benefit of using a</p>	

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			<p>marketing/PR expert on the marketing strategy, rather than staff without the requisite skills.</p> <p>The NPIA ‘road show’ has also given a presentation.</p> <p>The force will benefit from the planned evaluation exercise to assess which phases of the initiative were successful and which could have been done more effectively. If found to be a successful initiative HM Inspectors hope the work in this area will not cease.</p> <p>There have been considerable improvements in this area of the inspection. HM Auditors recommend this as good practice.</p>	
8	<p>Her Majesty’s Chief Inspector of Constabulary recommends that the Force reviews the overall process for PNC training at CoLP, including the following:</p> <ul style="list-style-type: none"> • Ensuring that training is delivered in a consistent manner with regard to course content and assessment; • Implementing a training plan to ensure that the needs of the force can be met; • Introduces mandatory re-assessment for PNC operators with 	Achieved in Part	<p>The force has a strategic training plan which is reviewed every 2 years. At a lower level there is a fully costed learning and development plan which is reviewed annually. At the point of delivery there is the training plan which identifies individual officer to be trained and their responsibilities within the organisation.</p> <p>Feedback during interviews suggests that training is vastly improved. Courses are planned in advance with a process</p>	

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	<p>refresher training to be provided to any candidate who fails the re-assessment and;</p> <ul style="list-style-type: none"> • Introduces a formal post training evaluation process which includes after trainees have had the opportunity to put the training into practice. 		<p>of application via supervision then training before courses are allocated.</p> <p>In the past, training was provided, when the trainers had time away from their core duties, usually on rest days. The force now has a full time trainer (who is shortly to retire) delivering training to national standards with a 'fall back' trainer in the control room. There is currently a bid for funding to employ a full time civilian trainer from May 2008.</p> <p>Refresher training is for those who have not used the system for 180 days After this period the lapsed user will sit an assessment, should the student fail to achieve the required standard a full training course is scheduled. This is good practice.</p> <p>The force intends to more to workplace assessment (level 3) but HM Auditors were not able to discover if this related to PNC or to all applications. The force would benefit greatly from using this assessment on all similar courses.</p> <p>It was also noted that the force often uses external providers, e.g. Essex Police for VODS & QUEST, a service which is paid for. The force does not</p>	

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			<p>currently evaluate these courses and therefore is not in a position to judge whether the course gives value for money.</p> <p>Recommendation: Her Majesty's Chief Inspector of Constabulary recommends that the cost and effectiveness of all courses be evaluated on an on going basis.</p>	
9	<p>Her Majesty's Chief Inspector of Constabulary recommends that the Force reviews its processes for the update of A/S records to ensure that all PNC records are complete, accurate, timely, and that the force complies with the Code of Practice.</p>	<p>Achieved</p>	<p>Computerisation and the fact that all offenders pass through Custody means that a paper form is no longer required as descriptive details are carried over from NSPIS Custody.</p> <p>It is however still possible to exploit weaknesses in the system, particularly as relates to compulsory fields (e.g. putting a full stop in a compulsory field to pass through it). The fact that the force is checking 100 % of the records to screen out this type of abuse and feeding the results back to BCU commanders is good practice.</p> <p>Quality control problems are exacerbated by the fact that sergeants take the role of custody officer in turn diluting the expertise. HM Auditors are aware that there is a view that custody should be centralised in Bishopsgate.</p>	

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			<p>Any comment on this would be outside the remit of this report.</p> <p>It should be noted however that as the requirement for accurate data capture on computer systems becomes more complex, the argument for comprehensively trained full time staff becomes more compelling.</p> <p>Duplicate records are now being picked up by the inputting staff as part of their daily tasks.</p> <p>The Economic Crime Department (ECD) currently inputs data directly into PNC. This spreads the quality control requirements into two departments instead of the one. HM Auditors were unable to establish why the department input their own information.</p> <p>The force has working relationships with many diverse organisations and has service level agreements to codify these arrangements.</p> <p>HM Auditors were advised that in the shorter term there is a move to create one PNC Bureau.</p>	

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			<p>Recommendation: Her Majesty’s Chief Inspector of Constabulary recommends that the force create a PNC Bureau and make it the centre of excellence within the force. The bureau will be the force interface with PNC, responsible for all functions.</p>	
10	<p>Her Majesty’s Chief Inspector of Constabulary recommends that the Force:</p> <ul style="list-style-type: none"> • Reviews the processes and resources in place for the update of court results to ensure that the efficiency and effectiveness of updates can be improved and sustained and; • Commences updating all court disposals, regardless of their origin, with immediate effect. 	<p>Achieved in Part</p>	<p>The force has officers in court to record adjudications, however is still takes 6 days for the magistrates court to send the validated results to the police. National court performance targets indicate a maximum of three days for this function.</p> <p>Recommendation: Her Majesty’s Chief Inspector of Constabulary recommends that the force or the LCJB, whichever is most appropriate review the timeliness of providing court adjudications with a view to reducing delay.</p> <p>The original inspection report cited ‘pockets’ of updaters within the force this has now been partially resolved by the creation of one central resulting point. All results from the Magistrates Court, Southwark and Blackfriars (and occasionally Snaresbrook) Crown Courts and results from the Central</p>	

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			<p>Criminal Court are updated by the force where appropriate.</p> <p>HM Auditors had some concerns that the flow of information between the force and None Police Prosecuting Agencies (NPPA's) may not be working as well as it should.</p> <p>According to performance statistics, over a three month period in 2007 only one NPPA case had been updated. Despite assurances that there were few NPPA cases this seemed particularly low considering that, for example, a breach of a court order may result in an NPPA update. The force should satisfy itself that NPPA's are complying with their requirements to supply update information for entry onto PNC.</p>	
11	<p>Her Majesty's Chief Inspector of Constabulary recommends that CoLP implements processes to ensure that officers are held accountable for the submission of complete data for input on to the PNC.</p>	<p>Achieved</p>	<p>This has been achieved by all offenders passing through Custody.</p>	
12	<p>Her Majesty's Chief Inspector of Constabulary recommends that the Force conduct regular reviews of the warning signals it has applied to PNC records to ensure that data protection principles are being complied with.</p>	<p>Not Achieved</p>	<p>HM Auditors were informed that this auditing function has now been actioned. However no evidence was produced to support this.</p> <p>The force's action plan sets out a need</p>	

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			<p>to develop working practices in relation to warning signals and identifies the Force Intelligence Bureau (FIB) as quality control 'Gatekeepers'. It goes on to say that FIB will be responsible for 5 year reviews.</p> <p>But nothing has happened.</p> <p>The force could be at risk from action taken by any officer in the UK in response to incorrect warning signals owned by the CoLP.</p> <p>Recommendation: Her Majesty's Chief Inspector of Constabulary recommends that the force undertakes a one-off audit of warning signals as a matter of urgency. The force should also create business processes to ensure the on-going evaluation and validation of warning signals.</p>	
13	<p>Her Majesty's Chief Inspector of Constabulary recommends that the Force expands the process for capturing intelligence to guarantee that information applicable to PNC is identified and that a process is developed to ensure that the information is updated accordingly.</p>	Not Achieved	<p>The force still has no reliable method for ensuring that intelligence is entered onto PNC. The development of a form to capture this information, replying as it does on the individual to complete and submit the information, will not achieve the required objective.</p> <p>The force currently stores intelligence</p>	

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			<p>on the Integra computer system which is due for replacement. The force is certainly not unique in relying on a local system for intelligence however in view of the transient population in the City the force has much to gain from incorporating PNC into it's core business processes.</p> <p>The capture of intelligence on PNC should be part of a well established process based upon the work of FIB. When an intelligence assessment is made based upon the national standard the use of PNC as the prime depository should be the first priority.</p> <p>The force should consider transferring the PNC function within the organisation to a department that reflects its potential. Its current position within Communications does not improve its perception by operational personnel as a crime investigation tool.</p> <p>Recommendation: Her Majesty's Chief Inspector of Constabulary recommends that the force consider repositioning PNC within the organisation to a department that reflects its potential as a crime investigation tool.</p>	

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			<p>The force should introduce business processes to ensure intelligence data is captured on PNC.</p>	
14	<p>Her Majesty’s Chief Inspector of Constabulary recommends that the Force develops quality assurance processes to ensure the integrity of PNC updates.</p>	<p>Achieved</p>	<p>A member of staff checks 100% of the records written from Custody to PNC although the effectiveness of this is somewhat frustrated by technical problems (not all transaction are shown) which is being addressed by the NPIA.</p> <p>The force can evidence that 50 of the 400 monthly transactions has been audited and the reasons for any failed transaction. Errors by custody officers are fed directly to BCU Heads/Custody Manager for action.</p>	
15	<p>Her Majesty’s Chief Inspector of Constabulary recommends that the Force implements procedures to review outstanding prosecutions on a continuous basis.</p>	<p>Achieved</p>	<p>The review of outstanding IP’s is undertaken continually thereby removing the requirement for a specific project. This is good practice.</p>	