



CITY OF LONDON POLICE

22 - 26 AUGUST 2005

**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 City of London Police between 22nd and 26th August 2005.
- 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 his 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 2 Borough Command Units (referred to as 'Areas'). 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 The City of London Police (CoLP) is responsible for the safety of everyone in London's 'Square Mile'. This covers an area of 779 acres, which stretches from the River Thames in the south to the Barbican Centre in the north, Holborn and Fleet Street to the west, and Aldgate and Liverpool Street to the east. It is also responsible for policing the Blackfriars, Millennium, Southwark, London and Tower Bridges. This area is the world's leading international centre for finance and related business services and includes a host of sensitive and high profile places of interest, including St. Paul's Cathedral, the Bank of England, Mansion House, Stock Exchange, Lloyds Building, Monument and the Central Criminal Court (Old Bailey). The area has a population of 8043 and 4421 households. However, these numbers are increased by the daily influx of some 350,000 commuters, as well as an estimated 300,000 cars travelling through and tourists.
- 1.2.2 The force HQ is based at Wood Street, and the force is organised into two territorial divisions with six command areas. The two territorial divisions are based at Snow Hill and Bishopsgate and are responsible for the day-to-day policing of the City. Half the force staff works from these police stations, and their functions include giving crime prevention advice, investigating crime, patrolling, staffing the traffic and environmental zone and dealing with public enquiries.
- 1.2.3 The Force is headed by the Chief Officer Team comprising the Commissioner, Assistant Commissioner and Commander. Around 1200 people work for the CoLP and are around one third of these are police support staff performing a wide range of professional, administrative and operational support roles.
- 1.2.4 Responsibility for PNC updates is an area of CoLP activity that has grown organically over a number of years. As a result several departments have responsibility for updating the system with Arrest/ Summons (A/S) reports and court results information. Responsibility for the update is largely determined by two factors: the first being the type

of offence for which a record is to be created. The second being the time of day. For example, Divisional Crime Administration Units create the majority of A/S reports, which arise as the result of an individual being processed through the custody suites. However these units are only available during office hours (8.30 – 17.00 Monday to Friday) and therefore the Control Room will create the A/S out of office hours. In addition, if the offender is arrested due to an economic crime, e.g. fraud, the Economic Crime Unit update the PNC with the A/S record. All charges are updated via the NSPIS Custody system. The Control Room has various other responsibilities with regards to PNC including Wanted/ Missing updates, vehicle updates and the provision of advanced searches such as VODS (Vehicles On Line Descriptive Searches) and QUEST (Queries Using Extended Search Techniques).

1.2.5 The creation of Arrest/ Summons records at CoLP is a manual process which requires the custody officer to fax a form (Form 353) to the Divisional Crime Administration Unit or Control Room 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 '290') which contains all the data required for a complete record on the PNC. This is posted to the Divisional Crime Administration Unit who will complete the record on the system.

1.2.6 Magistrates and crown court results are also updated by several departments. Court registers are received daily by the local criminal justice units on each division who will either update the result or place them in CoLP's internal mail system to the relevant department, e.g. Economic Crime, for input directly to PNC.

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 27th April 2000, ACPO Council endorsed the ACPO PNC Compliance Strategy. The strategy is based upon the following four aspects of data handling:

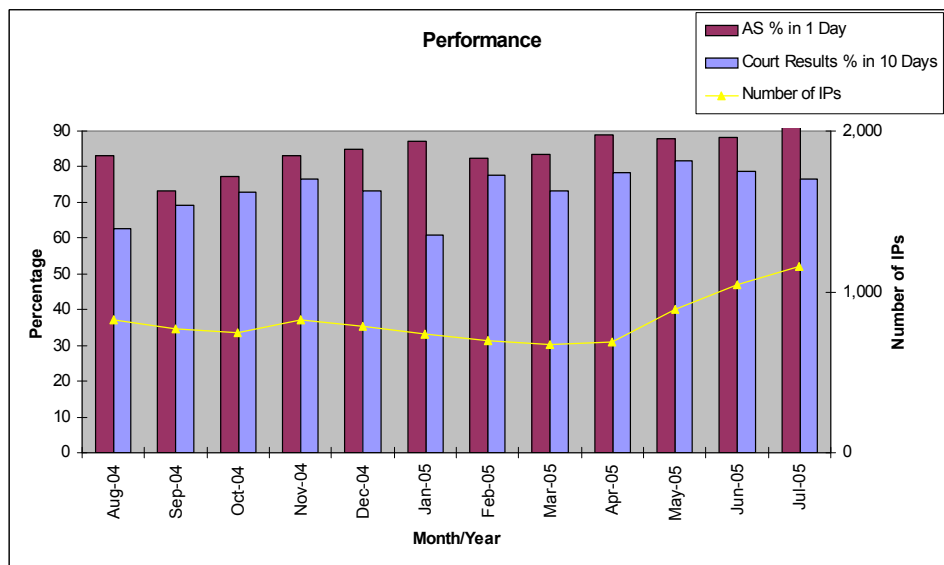
- Accuracy
- Timeliness
- Completeness
- Relevancy

- 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 1st 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 July 2005, CoLP input 92.3% of Arrest/ Summons (A/S) updates on PNC within 24 hours. This shows an improvement in performance in the 12 months to July 2005 from 83.1% in August 2004. Whilst such an improvement is to be commended the Force has only achieved the target once in the 12 months and data provided in the month following inspection showed that performance had fallen to 88.8%. This supports HMIC's conclusion that the improvement may not be sustainable under current processes.
- 1.4.5 CoLP's performance in terms of court results has also shown improvement against the Code of Practice target. In August 2004 the Force entered 62.7% of results within 7 days of the court date. This has increased to 76.4% being entered within 10 days in July 2005. However, performance fell in the month following inspection to 72.9% being entered within 10 days and under current processes the Force is unable to identify and therefore address the reasons for any such change.
- 1.4.6 In terms of Impending Prosecutions (IPs) CoLP has shown an increase of 40% in the 12 months to July 2005. The majority of this increase has occurred between April and July 2005 when the process of review was suspended due to a claimed resource shortage. HMIC Auditors would urge the Force to regain control of this area of activity before the volumes snowball to unmanageable levels.
- 1.4.7 A graph illustrating CoLP's performance in the 12 months to July 2005 is shown below:¹



1.5 Conclusions

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

Poor – No or limited evidence of effective activity against the protocol areas, or serious concerns in one or more area of activity.

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

- 1.5.2 This assessment is based on the detailed findings of the report which highlight serious concerns in some areas of activity. In particular, the Force needs to implement procedures which will ensure overall security of the system and data integrity and must review its current procedures in conjunction with the resources available to ensure complete, timely and accurate update of PNC records.
- 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, 1st Report’, *published 2001*
 - HMIC Report – ‘PNC Data Quality and Timeliness, 2nd 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 and User Group

2.1.1.1 At the time of inspection, CoLP had both a PNC Steering Group and a PNC User Group which meet on a quarterly basis. The Steering Group is chaired by the Assistant Commissioner and the chair of the User Group also attends the Steering Group. HMIC Auditors view this as good practice as it enables issues to be tackled at a strategic, tactical and operational level. Both groups were formed in January 2005 and HMIC Auditors encourage the Force to continue with the structure in order to progress the findings of this inspection.

2.1.2 Responsibility and Accountability

2.1.2.1 CoLP has a fragmented approach to PNC updating and therefore has no process for the production of management information with regard to PNC performance. There are “pockets” of updaters throughout the Force with regard to entering A/S reports and disposals on PNC which results in no one person or department being responsible for ensuring that data quality and timeliness issues are managed in a consistent manner. For example, Divisional Crime Administration Units update A/S records for divisional officers during office hours and the Control Room undertakes this task at other times, whilst the Economic Crime Unit updates PNC records for their officers. There is therefore no coherent process for updating the system, nor in holding officers accountable for late or poor quality data.

2.1.2.2 Without meaningful management information, it is not possible for senior officers and departmental heads to improve the timeliness and quality of data provided for input to PNC. Management information would also enable the Force to identify trends at individual, divisional, departmental and Force level. This in turn would assist the Force in identifying the reasons for under-performance to enable solutions to be put in place.

Recommendation 1

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.

2.2 Policy & Strategy

2.2.1 PNC Policy and Strategy

2.2.1.1 CoLP has no documented policy or strategy for PNC. A formalised strategy document or strategic action plan, outlining roles and responsibilities and covering topics such as Marketing and Awareness and PNC Security, would provide a framework to assist the Force in improving the efficiency and effectiveness of PNC usage throughout the Force. It would ensure that the Force gives 'ownership' of issues to individuals or departments, and generates a proactive approach to PNC. Importantly, it would help to ensure that the Force is getting a maximum return on its investment in the system and that officers gain optimal benefit from the information which is stored on it

Recommendation 2

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.

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 the Information Security Policy. 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 PNC trainers. The Force has processes in place to ensure that a user is only given access to the system upon completion of a training course. However the process for amending or removing access is ad hoc and there is therefore the risk that there are users with access to the system who no longer require it in fulfilment of their duties. Whilst HMIC Auditors do not question the integrity of the work of the PNC trainers, 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 3

Her Majesty's Chief Inspector of Constabulary recommends that CoLP:

- **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.**

- 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 CoLP this is a function of Control Room inspectors who select nine transactions at random daily for verification. The supervisor of the officer or member of staff who requested the check is telephoned and asked to confirm that the check was conducted for operational policing purposes. The response is logged in a book which is kept in the Control Room. During focus groups, officers reported that this process acts as a deterrent to officers from misuse or abuse of the system. However, this audit process is insufficient to ensure that each check is followed through to a satisfactory conclusion and Control Room staff and officers are not independently audited themselves.

Recommendation 4

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.

- 2.2.2.4 Data Protection Audits are conducted by the Data Protection Officer (DPO) at CoLP. 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. Upon completion of an audit the recommendations are provided to the PNC Steering Group which has responsibility for ensuring that all relevant actions are completed.
- 2.2.2.5 However, the DPO only conducts audits from September to January of each year and is therefore only able to complete four audits. An audit of transaction monitoring is conducted annually which therefore only leaves time to undertake a further three audits on PNC. 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 5

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

- **Ensures that sufficient data protection auditing is undertaken of the PNC;**
- **Ensures that individuals with responsibility for auditing have an up to date knowledge of national policies and procedures for PNC.**

- 2.2.2.6 HMIC Auditors also reviewed the role of the Professional Standard Department (PSD) with regard to PNC issues at CoLP. The PSD is independent of operational activities and such independence is viewed as good practice. In addition, the Data Protection Officer sits within the PSD which ensures that PSD is notified of any breaches of system security. The inclusion of PNC trained operators in the PSD would enable them to independently conduct investigations involving 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 the Force's system security policies. At present, the role of the ISO sits within the technology directorate, reporting to the Information Manager. As a result, the role of ISO is not independent of operational activities under the current structure. HMIC Auditors were disappointed to note that the Force's IT System Security Policies have not been reviewed since 2003 and the Force therefore has no assurance that changes to legislation and best practices have been incorporated into the policy. This may result in officers and staff not fully understanding their own roles and responsibilities in relation to information security on the system.

Recommendation 6

Her Majesty's Chief Inspector of Constabulary recommends that the Force updates its System Security Operating Procedure to include a section on the PNC.

2.3 People**2.3.1 Marketing and Awareness**

2.3.1.1 During meetings and focus groups, HMIC Auditors noted variable levels of awareness among officers and staff of the PNC and its functionality as an aid to operational policing. In particular, knowledge of QUEST was very low and officers who were aware of VODS and QUEST as intelligence tools were unclear as to whom within the force could conduct such searches on their behalf. In addition, officers and staff were largely unaware of the restrictions surrounding the use of driving licence and insurance information and therefore may be utilising this data inappropriately.

2.3.1.2 It is the view of HMIC Auditors that a focused marketing campaign should be carried out to raise the level of awareness of PNC functionality. This campaign should be developed as part of a marketing strategy owned by the PNC Steering Group but using expert resources that may be available to it, for example, Corporate Communications, the force intranet or the services of the PITO (Police Information Technology Organisation) PNC Customer Services team.

Recommendation 7

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.

2.3.2 PNC Training

2.3.2.1 PNC training was a further area at CoLP where HMIC Auditors identified concerns. The Force has two accredited PNC trainers, both of whom are also Control Room operators. Whilst their enthusiasm and operational knowledge of the system is evident, HMIC Auditors question whether they are able to provide a comprehensive training service to the force.

2.3.2.2 Particular issues arising from the current training delivery at CoLP include the fact that there is no consistent approach by the two trainers, for example one conducts an informal assessment at the end of each course but is unaware of whether any assessment is conducted by his colleague. A formal assessment before access is given to the PNC, both practical and theoretical is seen as good practice. It enables the assessor to objectively measure the competence of the personnel being given access to the PNC.

2.3.2.3 Furthermore, there is no planning of PNC courses in advance, rather they are delivered as and when requested. This results in the trainers conducting much of the training on overtime or rest days from their Control Room duties. Consequently, officers and staff reported delays in trying to get on a PNC course. The knock on effect of this is that several officers and staff reported having been on courses run externally, rather than by the force trainers, to enable them to fulfil their duties. It was reported to HMIC Auditors that annual planning of PNC training is to commence in 2006 under the new Head of Training and would encourage such a move to minimise the delays and resultant costs currently being experienced.

2.3.2.4 Another area for improvement relates to refresher training which has not been provided as routine at CoLP. PNC trainers would accommodate such a request but if it were forthcoming but at the inspection no such requests had been received. Forces which have incorporated refresher courses as routine, and in some cases as a mandatory requirement, have noted the benefits both to the Force and to the individuals involved in ensuring that skills and knowledge are kept up to date. HMIC Auditors noted that the method used by Divisional Crime Administration Unit staff to merge duplicate records is not the most efficient procedure and the staff members were unaware of the easier and quicker method. This is one example of something which could have been identified and addressed by the Force through re-assessment which would lead to best practice being adopted.

- 2.3.2.5 The final point to be made in respect of PNC training is post training evaluation. Again this is an ad hoc process with one trainer reporting that “Happy Sheets” are completed by candidates on each course attended but it was not known whether his colleague conducted a similar exercise. In addition, the completed sheets were not analysed in order to improve training course content and delivery but simply filed away. Finally, there is no follow up to ensure that the training provided was adequate once put into practice back in the workplace although this is an avenue being pursued by the Head of Training. 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.

Recommendation 8

Her Majesty’s Chief Inspector of Constabulary recommends that the Force reviews the overall process for PNC training at CoLP, including the following:

- **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 refresher training to be provided to any candidate who fails the re-assessment and;**
- **Introduces a formal post training evaluation process which includes after trainees have had the opportunity to put the training into practice.**

2.4 Partnerships and Resources

2.4.1 Relationship with the courts

2.4.1.1 The Force has officers located in each of the local courts. As a result, no issues were raised during the inspection with regard to this area of activity. The officers are able to resolve any queries quickly on behalf of the force and delays are kept to a minimum.

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. HMIC Auditors would therefore encourage the Force to introduce Service Level Agreements with its NPPAs to achieve this.

2.5 Processes

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

2.5.1.1 On 1st 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. However, for forces that create skeleton records on the PNC the ACPO Compliance Strategy target, which requires them to update the full record within 5 days, still applies after the 1st January 2005.

2.5.1.2 In July 2003, CoLP achieved the 90% target for the first time since the introduction of the Code. However, the fragmented approach to PNC and the lack of management information (discussed in 2.1.2) means that the Force was unable to identify how it had achieved this. In addition, HMIC Auditor reality checks showed that the Force was failing to update the full record within 5 days with 66% of records still on PNC in skeleton form after 5 days. One of the records was over 8 weeks old and was still in skeleton form on the PNC.

- 2.5.1.3 Furthermore, during meetings and focus groups HMIC Auditors noted that there is only a limited process to ensure that all duplicate records on the PNC are identified and merged into one. As a result of the fragmented processing approach to PNC at CoLP the volume of such records is constantly increasing and it is therefore imperative that the Force ensure it has adequate procedures in place to identify and deal with such records.
- 2.5.1.4 In addition, HMIC Auditors were notified of 24 recent cases in Force where DNA had been obtained under the 2003 Criminal Justice Act powers but there was no PNC record with which to link the sample. Without a supporting PNC record, forces are unable to retain DNA and fingerprint samples and therefore valuable intelligence is being lost which could hamper future investigations. This provided a further example of the problems caused by the current fragmented approach, as the Force had been unable to identify where the PNC record should have been created in order to identify a solution to the problem.
- 2.5.1.5 Finally, when carrying out reality checks of documents, HMIC Auditors discovered 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 January 2005. The Code states that the measurement for timeliness is from the 'commencement of proceedings' which in the case of an arrest is the time and date that a person is arrested. At CoLP the time and date of the decision (e.g. to charge/ bail/ release) by the custody officer is transmitted to PNC. During reality checks of documents, none of the cases 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 9

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.

2.5.2 Update of court results

2.5.2.1 The update of court results on the PNC also suffers from the force's fragmented approach since the department which created the original A/S is also responsible for ensuring that the corresponding disposal information is updated. It is therefore possible that cases which have been dealt with at court have not been resulted on the PNC with one department believing that another has updated the record. Up to and including July 2005 the Force has managed to meet its court result target, as set out in the Code of Practice, however the lack of management information in relation to PNC means that the Force would find it difficult to identify the reasons for any drop in performance and would therefore be unable to easily identify a solution.

2.5.2.2 Indeed in the two months following the inspection, CoLP's performance has fallen with regard to court results and the Code target is no longer being achieved (72.9% and 68.5% of results being entered within 10 days in August and September 2005 respectively). HMIC Auditors believe that the above problem has been caused by a recent re-structure at CoLP which led to the creation of the Force Central Crime Input Bureau (FCCIB) in June 2005. The Bureau has responsibility for ensuring that crime recording meets Home Office requirements. Staff in the FCCIB were taken from the Divisional Crime Administration Units, which have responsibility for the majority of the Force's A/S and court result entries on PNC. Consequently, the staffing levels at divisions have fallen at a time when the volumes of A/S and court result updates have increased due to the Force implementing its Criminal Justice Act powers to retain DNA and fingerprints from all arrestees since April 2005.

2.5.2.3 Finally in relation to this aspect of PNC activity, HMIC Auditors noted that CoLP does not routinely update court results received that relate to a case which originated from outside for the Force area. For example, CoLP receives all the court results from the Old Bailey but if the case had been referred from another area outside London, CoLP staff would not update the PNC with the disposal. This contravenes the national guidelines outlined in the PNC Manual.

Recommendation 10

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

- **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.**

2.5.3 Non – custody cases

2.5.3.1 During the inspection HMIC Auditors reviewed the process for PNC updates for cases that do not pass through custody, e.g. individuals reported for summons for a recordable offence. Under the Code of Practice for PNC the system should be updated within 24 hours of the commencement of proceedings and, as such, these cases are included within the Code. At CoLP there is a process for ensuring that the skeleton record is created on PNC within 24 hours. This should be followed by a form (referred to locally as a '290') being posted to the Divisional Crime Administration Units to enable the full record to be updated.

2.5.3.2 However, due to the absence of monitoring and performance management information, the Force is unable to assure itself that a 290 is received for every skeleton record created on the PNC. This information is vital if the Force to use the PNC to its full potential, for example using the enhanced search facilities such as QUEST. It is therefore possible that investigations are being hampered by inadequate data being held on the system.

Recommendation 11

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.

2.5.4 Warning Signals

2.5.4.1 Warning Signals exist on the PNC so that officers can be alerted that someone may be of danger to themselves, to the officer or to the public. Since they provide information regarding the mental and physical state of the record holder it is important that they are regularly reviewed to ensure that they can be justified, if data protection principles are to be applied.

2.5.4.2 Daily Activity File (DAF) prints are received frequently from Hendon which list all the warning signals which have been applied to records on PNC by the CoLP. HMIC Auditors were informed that this print is provided to the Data Protection Officer at CoLP but were unable to verify at the time of inspection the DPO's process for reviewing the list for amendments, retention or deletion. However, no data protection audit has been conducted of the warning signals facility for at least 2 years. There is therefore a risk that warning signals have been applied to records for which there is no validation and this could raise problems and embarrassment for the Force if an individual were to query a warning signal on their record in the future.

Recommendation 12

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.

2.5.5 Ad hoc intelligence updates²

2.5.5.1 CoLP does not currently have a process for the capture or update of ad-hoc intelligence on the PNC. Intelligence is recorded on the local intelligence system. However, there is no process to identify any data that is applicable to the PNC and arrange for the subsequent updating of the appropriate record. During focus groups with operational staff, PNC was perceived to offer less benefit than local systems because intelligence is not recorded or is often out of date. This perception could be changed if officers knew that their information could be used on the national system and a process developed to make the relevant updates.

Recommendation 13

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.

² Information applicable for update to PNC that originates from a source other than the creation of an Arrest/ Summons report.

2.5.6 Data quality

2.5.6.1 HMIC Auditors conducted reality checks at CoLP to determine the quality of data being supplied by officers and subsequently input to PNC. This was achieved by obtaining 20 source input documents, 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 and often included details such as occupation and habitual dress.

2.5.6.2 However, the level of accuracy with regard to the input on PNC was less impressive. Half the records reviewed had errors when compared with the source input document. For example, post codes for an offender's home address were supplied by officers but not input to the system, likewise places frequented, tattoos and habitual dress, were also omitted. HMIC Auditors were informed that, due to claimed resource shortages, there is no quality assurance of the work of inputters on PNC. There is a risk that the quality of updates on the PNC is inadequate to assist operational policing and will lead to officers losing confidence in the integrity of information held on the system.

Recommendation 14

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

2.5.7 MO keywords

2.5.7.1 CoLP does not currently update MO keywords on the PNC. 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. It is vital to the success of PNC that the Force commences the input of MO keywords.

Recommendation 15

Her Majesty's Chief Inspector of Constabulary recommends that the Force commences MO keywording, particularly for serious offences.

2.5.8 Finally with regard to processes, a more positive note. HMIC Auditor reality checks showed that CoLP updates all relevant information with which it is provided, for example all disposals and remand information including bail conditions.

2.6 Results

2.6.1 In July 2005, CoLP input 92.3% of Arrest/ Summons (A/S) updates on PNC within 24 hours. This shows an improvement in performance in the 12 months to July 2005 from 83.1% in August 2004. Whilst such an improvement is to be commended the Force has only achieved the target once in the 12 months and data provided in the month following inspection showed that performance had fallen back to 88.8%. At the same time the Force has failed to meet the ACPO Compliance target which states that forces who create skeleton records on the PNC should update the full record within 5 days. This is required for operational policing and investigative purposes, as discussed earlier in this report.

2.6.2 CoLP's performance in terms of court results has also shown improvement against the Code of Practice target. In August 2004 the Force entered 62.7% of results within 7 days of the court date. This has increased to 76.4% being entered within 10 days in July 2005. However, performance in fell in the month following inspection to 72.9% being entered within 10 days. The Force will need to address the fragmentation of processes and the lack of performance management information if it is to achieve sustained improvement with regard to both Arrest/ Summons and court resulting.

2.6.3 Finally, with regard to outstanding prosecutions on the PNC in the 12 months to July 2005 the Force has had an increase of 40% in the 12 months to July 2005. The majority of this increase has occurred between April and July 2005 when the process of review was suspended due to claimed resource shortages. HMIC Auditors would urge the Force to regain a handle on this area of activity before the volumes snowball to unmanageable levels. 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. HMIC Auditors were informed that cases are now reviewed on a 'come to notice' basis rather than being routinely reviewed and updated. Therefore, HMIC Auditors remain to be assured that the Force is able to provide such confirmation.

Recommendation 15

Her Majesty's Chief Inspector of Constabulary recommends that the Force implements procedures to review outstanding prosecutions on a continuous basis.

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

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.

Recommendation 2

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.

Recommendation 3

Her Majesty's Chief Inspector of Constabulary recommends that CoLP:

- **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.**

Recommendation 4

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.

Recommendation 5

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

- **Ensures that sufficient data protection auditing is undertaken of the PNC;**
- **Ensures that individuals with responsibility for auditing have an up to date knowledge of national policies and procedures for PNC.**

Recommendation 6

Her Majesty's Chief Inspector of Constabulary recommends that the Force updates its System Security Operating Procedure to include a section on the PNC.

Recommendation 7

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.

Recommendation 8

Her Majesty's Chief Inspector of Constabulary recommends that the Force reviews the overall process for PNC training at CoLP, including the following:

- **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 refresher training to be provided to any candidate who fails the re-assessment and;**
- **Introduces a formal post training evaluation process which includes after trainees have had the opportunity to put the training into practice.**

Recommendation 9

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.

Recommendation 10

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

- **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.**

Recommendation 11

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.

Recommendation 12

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.

Recommendation 13

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.

Recommendation 14

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

Recommendation 15

Her Majesty's Chief Inspector of Constabulary recommends that the Force implements procedures to review outstanding prosecutions on a continuous basis.

APPENDIX B – SUMMARY OF GOOD PRACTICES AT CoLP

- **The Force has a Professional Standards Department which is independent of operational activities and which includes the Data Protection Officer.**
- **The Force updates all relevant data fields on the PNC upon receipt of information.**

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 – 1ST 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 – 2ND 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.