



**GLOUCESTERSHIRE CONSTABULARY**

**13 – 17 SEPTEMBER 2004**

**POLICE NATIONAL COMPUTER**

**COMPLIANCE REPORT**

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## 1. 1 Executive Summary

### 1.1 Introduction

1.1.1 Her Majesty's Inspector of Constabulary (HMIC) conducted a Police National Computer (PNC) Compliance Inspection of Gloucestershire Constabulary between 13<sup>th</sup> and 17<sup>th</sup> September 2004.

1.1.2 Gloucestershire Constabulary was subject to a PNC Compliance Audit using the April 2003 Protocols on the 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 two of three BCUs (referred to as 'Division'). These views have been supported by reality checks conducted by HMIC PNC Compliance Auditors.

### 1.2 Background

1.2.1 The county of Gloucestershire is situated at the northern edge of the southwest region of England covering an area of 1,025 square miles. The county city is Gloucester and the largest town is Cheltenham. The county encompasses the Cotswolds in the north and the Royal Forest of Dean in the southwest which are separated by the Severn Vale. It comprises six local authorities, but despite its image as a rural idyll there are significant pockets of deprivation. In particular, Gloucester district is the 101<sup>st</sup> most deprived district in the country out of 354 districts. The total population is approximately 564,600.

1.2.2 The Force is headed by the chief officer group, led by the Chief Constable, supported by the Deputy Chief Constable (DCC), two Assistant Chief Constables (ACC) with responsibility for operations and corporate services respectively. A police staff Director of Resources holds the finance, personnel and administration portfolios. The Force strength comprises approximately 1,289 full-time equivalent police officers, 755 police staff which includes traffic wardens and police community support officers (PCSOs), and 166 special constabulary officers. It is important to note that not all of the 1,289 police officers are available for deployment across the county as a number of these posts are specifically funded by the Home Office for royal protection duties as the county includes two royal residencies.

1.2.3 For general policing purposes the Gloucestershire Constabulary area is divided into three territorial divisions, which are each coterminous with two local authority areas. Each division is divided into local neighbourhood policing areas within a geographical policing model.

- 1.2.4 At Gloucestershire Constabulary the main updating of the PNC is carried out by the Phoenix Bureau based within the Criminal Justice Department (CJD) located within Gloucester police station. The Phoenix Bureau was set up in April 2004 and currently operates with mainly agency staff. The bureau is divided into three sections each with responsibility for updating separate areas of the PNC, namely the source input document (known in Force as the PHO1 form), bail conditions and warrants, and the court results. The bureau is staffed from 08.00 till 18.00 hours Monday to Friday, with one member of staff from the PHO section covering a day shift each day of a weekend and on bank holidays.
- 1.2.5 Gloucestershire have installed an IT system known as 'Unity' that has applications in custody, crime recording, intelligence and case preparation. The benefit of the system is that data only has to be entered into one of the applications for it to be shared across them all. Therefore double keying of information is kept to a minimum across the force thus increasing efficiency and the potential for information sharing.
- 1.2.6 When a person is taken into custody their details are entered into Unity. Currently there is no interface between Unity and the PNC so the arresting officer or the custody detention officer (CDO) has to complete a paper PHO1 form. The paper PHO1 form printed from Unity is populated with limited information such as the offender's name, address, date of birth and offence details. Although Unity holds descriptive data on the subject, this information is not supplied on the printout. Once completed, the PHO1 form has to be scanned and sent to the Phoenix Bureau for the PHO section to update the PNC with a full record.
- 1.2.7 The results from the magistrate courts are electronically transferred to the Unity system. The resulting section within the Phoenix Bureau print off the results and then update the PNC from the paper copy. The crown court results are manually collected on a daily basis and the PNC is updated from that paper register.
- 1.2.8 The PNC Bureau (PNCB) located within HQ has a complement of two staff and operates between the hours of 08.00 and 20.00, Monday to Friday. The PNCB is responsible for entering Wanted/Missing (W/M) reports, disqualified driver reports, and vehicle and property reports. PNCB staff also provide police officers with telephone PNC enquiries and VODS (Vehicle On-Line Descriptive Searches) and QUEST (Queries Using Extended Search Techniques) searches. Out of office hours, cover is provided by the Communications Centre.
- 1.3 1.3 Methodology
- 1.3.1 A full inspection was carried out covering the sections of; Leadership; Policy & Strategy; People; Partnerships & Resources; Processes and Results.
- 1.3.2 The inspection was conducted over three stages with a final assessment being provided in line with the grading structure as detailed below;
- **Excellent** Comprehensive evidence of effective activity against all the protocol areas.

- **Good** Evidence of effective activity covering many areas of the protocols but not comprehensive.
- **Fair** Evidence of effective activity covering some areas of the protocols, 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 PNC Compliance Auditors with documentation to support their adherence to the protocols. This was followed up by a visit to the force with HMIC PNC Compliance Auditors conducting 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 documentation (arrest data and warrants) and checks against user access groups and training records.

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 1.4 Current Performance

1.4.1 On 27th April 2000, ACPO Council accepted the ACPO PNC Compliance Strategy. The strategy is based upon the following four aspects of data handling;

- Accuracy
- Timeliness
- Completeness
- Relevancy

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.

1.4.2 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 targets set by the PIs in order to improve their position for each of the aspects mentioned above. The key PIs of the strategy are as follows: -

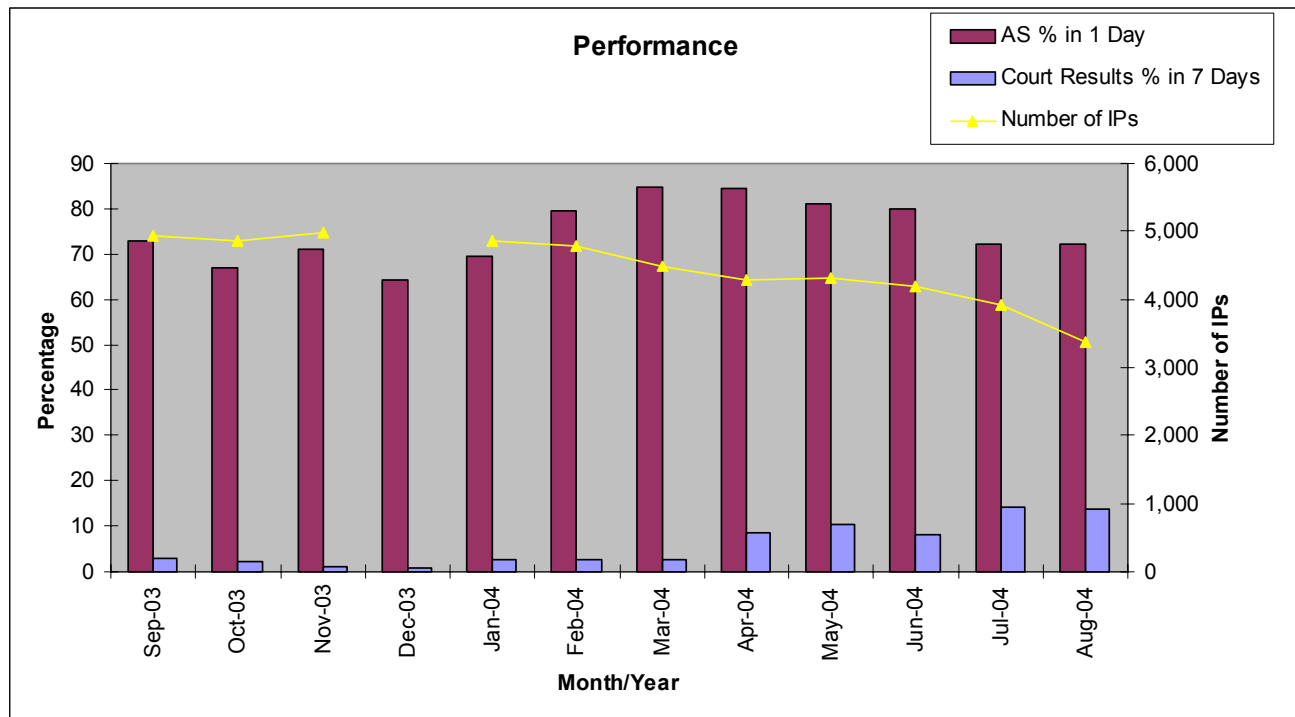
- i. i. Arrest/Summons – 90% of cases to be entered within 24 hours (where forces are using skeleton<sup>1</sup> records as initial entry, full update must be achieved within 5 days).

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<sup>1</sup> This is used to describe those Arrest/Summons reports that only contain the minimum amount of information that is required to register the record on the system

- ii. li. Bail Conditions – Entry of Police Bail within 24 hours.
- iii. lii. Court Case Results – 100% to be entered within 72 hours of coming into police possession. (Courts have their own target of three days for the delivery of data to the police, therefore, the police are measured against an overall target of 7 days, to take account of weekends and bank holidays.)

- 1.4.3 In August 2004 Gloucestershire entered 72% of Arrest Summons (A/S) reports within the 24 hour target. In August 2003 this figure was 73%, and in the 12 months to August 2004 Gloucestershire have reached highs of 85% in March and April 2004. However it is worthy of note that in August 2003 Gloucestershire were entering 908 A/S reports in the month whilst in August 2004 this has risen to 1,239, an increase of 36%. This increase is due to Gloucestershire's decision to input all cases subject to Sec. 47(3) bail and to record on the PNC all persons that have had DNA and fingerprints taken. The Force is commended for this decision, but needs to ensure that it has robust processes in place to manage the increase in workload in both the areas of A/S reports and impending prosecutions (IPs).
- 1.4.4 Gloucestershire's performance in terms of court results, as displayed in the PITO statistics, has been poor. The percentage of court results entered within seven days in August 2004 is 13.6%, which is only the third time the Force has achieved over 10% in the previous 12 months. The days to 90% have demonstrated a similar performance with the least number of days of 134 being achieved in August 2004. The magistrate courts have contributed to this performance, as there has been a severe time delay in the court clerks recording the results onto the courts' system that transfers the information to Unity. This backlog was cleared during the first week in September. However, in the months leading up to this clearance the Phoenix bureau have had to deal with an increasing number of court results to record onto the PNC. Gloucestershire are commended for the work of the resulting section which has enabled them to manage the variable workloads, from lows of 790 and 748 court results input in April and May, to a high of 1,694 in August 2004.
- 1.4.5 In terms of Impending Prosecutions (IPs), the overall outstanding number of IPs for Gloucestershire Constabulary has reduced from 4,940 in September 2003 to the current 3,371 showing a decrease of 47% over a 12 month period. A large part of the earlier HMIC PNC inspections in 2001 and 2002 were focused on the examination of Impending Prosecutions to ensure that records remaining on the PNC for more than 12 months were there for legitimate reasons – for example, the offender had absconded and an arrest warrant had been issued. This reduction is in part due to the clearing of backlog of court results as mentioned in the previous paragraph. Although the Phoenix Bureau record the outstanding IPs on a spreadsheet it was reported that the regular checking of these has been sporadic due to resources being focused on the input of the high volume of court results. HMIC PNC Compliance Auditors look forward to this check of IPs becoming a monthly exercise.
- 1.4.6 A graph illustrating Gloucestershire's performance in the 12 months to August 2004 is shown below:



Note: The Y-Axis showing the percentage of A/S reports & Court Results input within given time periods shows a maximum of 90% to clearly show the performance of the Force in relation to the target set by the performance indicators of the ACPO Compliance Strategy.

The dotted line between Nov 03 and Jan 04 for the Number of IPs has been included to show the trend during the period, as PITO have been unable to provide IP statistics for Dec 03.

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 of the protocols, but concerns in others.

1.5.2 This assessment is based on the detailed findings of the report. However, the key areas can be summarised as follows:

- Although the integrity of the Data Protection Audits is not in question, the small number of audits that are carried out on an annual basis, coupled with the lack of ownership of the report recommendations gives the HMIC PNC Compliance Auditors cause for concern.
- There is an absence of formal assessments on the completion of PNC enquiry courses and, as such, the Force is unable to evidence that all those given access to the PNC are competent. In addition, PNC enquiry courses have remained at the same length for ten years despite the number of enhancements and developments to the PNC databases. This gives cause for concern as the Force is unable to demonstrate that the training provided sufficiently equips its officers and staff to use and understand the functionality of the PNC.

- Whilst HMIC PNC Compliance Auditors view the establishment of the Phoenix Bureau as good practice, its current position is somewhat precarious with the majority of staff being employed from agencies. The Force will have already invested in the training of these personnel, yet their skills could be lost to Gloucestershire Constabulary after a short period of notice with the offer of a more permanent position elsewhere.
- HMIC PNC Compliance Auditors commend the Force for recording the Section 47(3) bail and the arrestees that can now be input onto the PNC as a result of the changes introduced by the 2003 Criminal Justice Act, despite the additional workload it has generated for the Phoenix Bureau.
- Her Majesty's Inspectorate of Constabulary has found weaknesses in five sections of the protocols.
- Her Majesty's Inspector is concerned that the Force has not made progress towards some of the recommendations made in previous national HMIC reports into the PNC Data Quality and Timeliness, as outlined in Appendices B to E. Issues identified within this report as areas for improvement coincide with recommendations in previous reports where no progress has been made.

1.5.3 The findings of this report should be read in conjunction with the previous reports and recommendations relating to 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*

1.5.4 A summary of good practice points, along with recommendations for improvement can be seen in Appendix A of this report.

## 2. Detailed Findings and Recommendations

### 2.1 Leadership

#### 2.1.1 PNC Steering and Working Groups

2.1.1.1 It was reported to the HMIC PNC Compliance Auditors that the PNC meeting structure has recently changed. This new structure consists of a PNC Steering Group (PSG), chaired by the ACC, and a PNC Working Group, chaired by the FIB/PNC Liaison Officer. This replaces the old structure whereby there was only one group, the PNC Steering Group, chaired by the FIB/ PNC Liaison Officer. The Working Group is attended by representatives from the PNC Bureau, the Fingerprint Bureau, Criminal Justice Department (CJD), Data Protection, the Contact Centre, and the Crime Management Units (CMUs) on Division and is responsible for implementing the strategic decisions of the Steering Group.

2.1.1.2 A number of earlier reports by Her Majesty's Inspector of Constabulary, including the thematic report 'On the Record' highlighted the crucial role of ACPO involvement on PNC Steering Groups. This was, in fact, one of the few areas of consistency in forces who were seen as performing well in earlier inspections and its importance cannot really be over emphasised.

2.1.1.3 HMIC PNC Compliance Auditors are aware of a number of forces throughout England and Wales where a similar structure of sub groups is employed to implement the strategic decisions from the PSG. A PNC Working Group also assists with the dissemination of any changes made to the PNC, communicates PSG decisions and passes items to the PSG for discussion at the appropriate level. Gloucestershire are encouraged to ensure that the PNC Working Group encompasses all these responsibilities as described above.

2.1.2.1 HMIC PNC Compliance Auditors view the new PNC meeting structure as a positive move, although within Gloucestershire it is still in its infancy and needs to be embedded into the management of the PNC.

#### 2.1.2 Performance Monitoring

2.1.2.1 The Force is to be commended that the A/S timeliness indicators are broken down to a divisional level and circulated to the Divisional Commanders within the monthly Performance Improvement Report (PIR), which is also available to all staff via the intranet. Gloucestershire's usage of QUEST and VODS is also illustrated within the PIR. These statistics are compared with those of other forces within the region and with the PNC family of similar forces. This is considered to be good practice.

2.1.2.2 However, this PIR management information does not include data concerning the quality of information being supplied by officers to update the PNC. Information relating to quality issues would enable Divisional Commanders to take any necessary action against officers who persistently submit poor quality information. This, in turn, would improve overall data quality within the Force and reduce the administrative burden caused by the submission of poor quality data.

**Recommendation 1**

**Her Majesty's Inspector of Constabulary recommends that Gloucestershire Constabulary expands its current system of performance monitoring to include information on the quality of data submitted for input to the PNC.**

**2.2 Policy and Strategy**

2.2.1 With regard to policy and strategy, the inspection covered a number of areas that warrant review. These can be described under five broad headings: PNC Strategy; PNC Policy and Procedures; Security; Data Protection Audits; and Transaction Monitoring. Each of these themes is discussed in further detail below.

**2.2.2 PNC Strategy**

2.2.2.1 In HMIC's second report on the Police National Computer Data Quality and Timeliness (the recommendations of which are provided in Appendix E of this report), it was recommended that a PNC Strategy should be an integral part of a force's information management strategy. However, there is no such document within Gloucestershire Constabulary.

2.2.2.2 A formalised strategy document, 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. 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 most benefit from the information which is stored on it.

**Recommendation 2**

**Her Majesty's Inspector of Constabulary recommends that Gloucestershire Constabulary urgently considers a formally documented strategy for PNC, either a PNC Strategy in its own right or incorporated into a local Information Management Strategy (See Recommendation 2 – Appendix E). The document should be supported by an action plan covering the recommendations of this report and all previous reports where no progress has been made. The action plan should contain specific objectives, to be attained within certain timescales and ownership of issues to be attributable to individuals.**

## 2.2.3 PNC Policy and Procedures

2.2.3.1 Gloucestershire has a publicised policy document in place which clearly outlines each individual's responsibility with regard to the PNC and states that the system is only to be used for legitimate policing activities within national guidelines. However, this needs to be supported by comprehensive procedural guides outlining individual and departmental responsibilities for maintenance and update of the system within the Force. These should subsequently be enforced throughout the Force in order for them to be effective.

2.2.3.2 In particular, the feedback during focus groups indicated that there is no clear understanding as to who is responsible for the cancellation of warrants on PNC. It also appears that where the warrant documentation is stored depends on the division responsible for the warrant. In the Gloucester Division the warrant is stored centrally, whereas in the Cheltenham Division the warrants are stored in the police stations throughout the division. This lack of a corporate approach to warrants can lead to confusion among officers and staff as to where the warrant documentation can be located. This was demonstrated during the focus groups where a number of conflicting explanations of the procedure and location of warrants was provided to HMIC PNC Compliance Auditors.

### **Recommendation 3**

**Her Majesty's Inspector of Constabulary recommends that the Force reviews, and senior officers enforce, its procedural documents in connection with the PNC to ensure that they cover all aspects of PNC information and supporting documentation.**

## 2.2.4 Security

2.2.4.1 Gloucestershire Constabulary has an Information Security Policy that is reviewed regularly, but again the Force should ensure that the policy is enforced. HMIC PNC Compliance Auditors were provided with anecdotal evidence that User IDs on the Unity system were being shared. The Unity system gives users access which enables them to make PNC enquiries. However, the sharing of computer User IDs is not only a contravention of the Force's Information Security Policy, but also breaches the 1990 Computer Misuse Act, whichever system the member of staff is using.

### **Recommendation 4**

**Her Majesty's Inspector of Constabulary recommends that the Force has the appropriate procedures in place to ensure that all staff are given training and adhere to the 1990 Computer Misuse Act.**

- 2.2.4.2 HMIC PNC Compliance Auditors reviewed the structure of the PNC user groups. The user groups determine the level of access to the PNC. The group can restrict the trained operator to enquiry only or enable them to update all or parts of the database. During the review a non-operational role was found to have the ability to update the PNC even though this facility was not required, nor necessarily appropriate, for the role. Although it was reported that the structure of the groups is appraised every six months, the Force should ensure that the structure of the groups is appropriate to the roles of the personnel within the category.

#### **Recommendation 5**

**Her Majesty's Inspector of Constabulary recommends that the Force ensure that the levels of access to the PNC are appropriate to the level of training and role of the operator.**

- 2.2.5 Data Protection Audits
- 2.2.5.1 Gloucestershire Constabulary has an annual data protection audit plan. The plan is produced using the risk assessment process as per the ACPO Data Protection and Audit Manual (DPAM). In addition, audit reports are produced in accordance with the DPAM including the classification errors.
- 2.2.5.2 However the number of audits completed during the year was not considered by HMIC PNC Compliance Auditors to be sufficient given the resources available within the Data Protection Unit. HMIC PNC Compliance Auditors are aware of a Force within Gloucestershire's most similar force group where the data protection unit conducts approximately 18 data protection audits annually – which include some of the additional information systems within that force. This is considerably more than the work conducted by a similarly resourced team in Gloucestershire.
- 2.2.5.3 During interviews it was reported that whilst the previous audit reports contained recommendations there is currently no ownership of the reports and no mechanism to ensure that recommendations are followed up and implemented. HMIC PNC Compliance Auditors are of the opinion that all recommendations from data protection audits relating to PNC, should be owned and progressed via the PNC action plan, overseen by the PSG. This will help to ensure that all issues identified can be rectified and process improvements put in place.
- 2.2.5.4 It was reported to the HMIC PNC Compliance Auditors that the three Divisions conduct autonomous audits of the Force's outstanding warrants. There was no information sharing between the divisions with the result that the methodology of the divisional audits was not consistent. This was demonstrated by the fact that the outcome of one audit was a written report, whilst the other produced verbal feedback. It is the opinion of the HMIC Compliance auditors that whilst they do not wish to discourage auditing of the PNC, it is essential that there should be forcewide procedures so that there is a coherent approach in order that best practice can be identified.

**Recommendation 6**

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

- (a) Review the current annual audit plan to consider increasing the number of audits undertaken by the Data Protection Unit.**
- (b) Allocates the ownership of the audit recommendations to the PSG to ensure that all relevant action is undertaken.**
- (c) Adopt consistent audit methodologies across the Divisions. These could be developed by the PNC Working Group.**

## 2.2.6 Transaction Monitoring

- 2.2.6.1 Transaction monitoring is a function carried out by personnel based within the Data Protection Unit. Five transactions per day are validated by sending a standard form to the enquirer or PNC operator concerned requesting an explanation for the transaction being performed. The form must be signed off by the person's line manager prior to being returned to the Data Protection Unit. However, no validation is carried out on the response received, provided it appears reasonable. There is therefore the risk that invalid PNC checks are being performed for reasons other than legitimate police activities and these are going undetected. This issue has been highlighted in recent months with other forces in England and Wales who have found abuse of the system within their forces.

**Recommendation 7**

**Her Majesty's Inspector of Constabulary recommends that the Force evaluates the current method of transaction monitoring to determine whether it is effective and robust in preventing and detecting abuses of PNC access.**

## 2.3 People

### 2.3.1 PNC Awareness/Marketing

- 2.3.1.1 Through information obtained from focus groups and interviews held during this inspection, HMIC PNC Compliance Auditors are of the opinion that although personnel were aware of the PNC, it was not viewed as an intelligence tool. In addition, it is not seen as a primary source of information due to the Forces' previous reliance on the local intelligence systems know as BODS (basic on line data system).

- 2.3.1.2 Those police officers who were aware of the QUEST and VODS search tools of the PNC were however uncertain as to how to obtain a check, particularly out of hours when the PNCB is not staffed. The statistics of VODS and QUEST usage produced for the monthly PIR does show Gloucestershire Constabulary as a below average

user of these facilities of the PNC when compared to the regional and family average.

### **Recommendation 8**

**Her Majesty's Inspector of Constabulary recommends that the Force ensures that VODS and QUEST checks can be obtained on a 7 day, 24 hour basis and that this is communicated. This will either entail a 24/7 facility within force or by making reciprocal agreements with one of the larger surrounding forces.**

## 2.3.2 Training

2.3.2.1 HMIC PNC Compliance Auditors were provided with the Gloucestershire Constabulary Training Policy as part of the pre-read documentation for the inspection. The policy dated August 2004, is approved and reviewed annually by the PSG.

2.3.2.2 It is of concern to note however, that the policy states: "The assessment of their current skills will be made by one or more of those listed in schedule A". Schedule A included trainers other than just Centrex accredited PNC trainers. This use of non-accredited trainers to provide PNC assessment is contrary to the principles of the Code of Connection and also the guidelines provided by the PNC Manual which states;

*"It is essential that all personnel having contact with PNC facilities must be trained to the correct standard by trainers who have themselves been fully accredited by Centrex.<sup>2</sup>"*

2.3.2.3 In addition to the Code of Connection and the PNC Manual, section 7.5 of a previous thematic inspection report published by HMIC in 2000, "On the Record" dealt specifically with PNC Training. The findings of that report highlighted various levels of training across all forces which had taken part in the thematic inspection. The outcome of the findings in 2000 was recommendation 13 of the report;

*"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."*

2.3.2.4 It was reported to HMIC PNC Compliance Auditors that the PNC courses delivered by Gloucestershire Constabulary trainers do not include a formal assessment process. 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.

2.3.2.5 HMIC PNC Compliance Auditors were also concerned to learn that the PNC enquiry course provided by Gloucestershire was two days in length. It was reported that the course duration has not changed in 10 years. There have been a number of

<sup>2</sup> Extract from Section 5 (Training) of Volume 1 of the PNC Manual, version 4.01, March 2004.

additions to the PNC during that time period, such as sex offender orders, anti social behaviour orders, the addition of the bail conditions page and football banning orders. In order to ensure that all police officers and staff have a complete understanding of the facilities that PNC provides and are thus able to use the system fully in exercise of their duties, it is important that all relevant aspects of the system are trained and explained fully. The national guidance issued by Centrex in this regard is that a Vehicle Enquiry course should be conducted over a 3 day period and a Names Enquiry course over 4 days.

- 2.3.2.6 Currently, Gloucestershire Constabulary do not offer PNC refresher training. HMIC PNC Compliance Auditors are of the opinion that refresher training should form part of regular training needs analysis to ensure that skill levels are maintained. However, in order to reduce abstraction rates amongst staff, the force may wish to adopt the practice of other forces whereby staff are requested to sit the assessment that is offered at the end of a course. The use of the assessment ensures that only staff who have not maintained their skills require a refresher course to retain their access to the system.
- 2.3.2.7 The Force has decided to train all probationers on a two day PNC enquiry course during their probationary programme. During focus groups it was reported that police officers who had been trained to enquiry level on the PNC did not carry out their own enquiries due to a lack of computers with PNC access. Whilst this decision has its merits the force needs to assure itself that they are receiving the benefits of this volume of training and whether the content of the course is appropriate.

#### **Recommendation 9**

**Her Majesty's Inspector of Constabulary recommends that the Force introduce a PNC training policy document that provides for:**

- (a) A formal assessment process prior to access being given to the PNC.**
- (b) The provision of refresher training.**
- (c) A regular review of the length and content of the PNC courses delivered.**

## **2.4 Partnerships and Resources**

- 2.4.1 Gloucestershire Constabulary has persevered to develop its working relationship with the Magistrates Courts through the Local Criminal Justice Board and the Magistrates Courts Inspectorate over the last 12 months. As a result, the Magistrates Courts have now cleared the backlog of court registers that had built up over a period of two years. During the preceding months the numbers of court disposals that the results section of the Phoenix Bureau has had to process has varied from 790 and 748 in April and May 2004 increasing to 1,461 and 1,694 in July and August. This has involved staff working overtime during the week and

weekends in order to process the backlog from the magistrates' courts. Consequently, it was reported that the average number of days for Gloucestershire to update the PNC with the court results increased to 5 days during the month of August. HMIC PNC Compliance Auditors are reassured that this figure will be reduced during the subsequent months as the numbers of court disposals being entered will fall to a manageable level.

2.4.2 However, it was reported to HMIC PNC Compliance Auditors that the magistrates' courts have a challenging verification process, the effect of which is that many of the court registers are received by Gloucestershire outside the magistrates courts own target. It is therefore recognised that the magistrates' courts have contributed significantly to the Force's inability to achieve the ACPO target.

2.4.3 Furthermore, evidence was provided of approximately 500 cases, which have been identified by Gloucestershire Constabulary for which no court result has been received. Of these 500, approximately 10% are recordable offences that should have been resulted on the PNC. Although the Force has highlighted these cases to the courts and the Crown Prosecution Service, the issue is yet to be resolved.

#### **Recommendation 10**

**Her Majesty's Inspector of Constabulary recommends that the Force continues to develop its liaison with the local Magistrates Courts to ensure that the Court personnel are aware of the expectations of the Police with regard to inputting of court results onto the PNC so that the speed of the results being sent to the Phoenix Bureau is improved. In addition, the Force should progress the issue of the missing results with all relevant parties, such as the Courts, the CPS and the Magistrates Court Inspectorate, in order to find a timely resolution.**

2.4.4 Gloucestershire Constabulary have sent out service level agreements (SLAs) to ten Non Police Prosecuting Agencies (NPPAs), to assist in achieving the target of entering 90% for Arrest/Summons reports being entered within one day. Nationally, NPPA prosecutions account for less than one in ten of all prosecutions and whilst this forms a small percentage of the total in Gloucestershire Constabulary, inputting them at the correct stage of the process would assist the Force in achieving the 90% target. Gloucestershire Constabulary is to be commended for their actions thus far and will need to ensure that the agreements are adhered to in the future.

## **2.5 Processes**

2.5.1 HMIC PNC Compliance Auditors found a number of areas worthy of note in the management of PNC information. These can be broadly described under the following headings: quality of data; submission of source input documents; update of police bail data, ad-hoc intelligence updates, the Phoenix Bureau, the availability of PNC checks and the quality of the data on the originator line.

## 2.5.2 Quality of Data

2.5.2.1 It was reported to the HMIC PNC Compliance Auditors that the Phoenix Bureau will check the data quality of the PHO1 against other IT systems within Gloucestershire Constabulary. Whilst this will assure the quality of data being entered onto the PNC, in the long term this practice is counter productive as the police officers who are responsible for providing good quality data are not being made aware of the unacceptable quality of information they are providing. There is therefore an absence of ownership and accountability in this area.

2.5.2.2 On the whole the reality checks that the HMIC PNC Compliance Auditors carried out on the PHO1s did not reveal any major errors. The errors that were recorded appeared to be as a result of the updater being careless and could be as a result of the additional research the member of staff needs to carry out in order to obtain complete and accurate information as discussed in the previous paragraph. One type of error, which is worthy of note, was a failure to attach a Warning Signal to a record when the offence for which the person was in custody clearly merited this. The existence of a Warning Signal on a record is the only method of alerting a police officer that someone could be a danger to themselves, to the officer or to the public and, as such, it is imperative that that such information is updated on the PNC at the earliest opportunity.

### **Recommendation 11**

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

- (a) Provides formal feedback to the divisions on the quality of information being provided by their officers in the form of specific advice to individual officers in addition to the overall divisional quality statistics, as described in Recommendation 1 of this report.**
- (b) Introduces a formal quality assurance process within the Phoenix Bureau for the update of PNC data, to include the update of Warning Signals where appropriate.**

## 2.5.3 Submission of the PNC Source Input Document

2.5.3.1 Gloucestershire Constabulary has outsourced the provision of custody detention officers (CDOs) to a private company. Generally, feedback from focus groups was very positive as the CDOs complete most of the PHO1, leaving the officer with responsibility for completion of the Modus Operandi section only. However, anecdotal evidence was obtained that during busy periods in the custody units the CDOs are unable to assist in the completion of the PHO1s due to staffing issues. HMIC PNC Compliance Auditors are concerned that this inconsistency in the process could lead to errors and omissions being made in the completion of these forms. It was reported that by Christmas 2004 more CDOs will be available during the busy periods in the custody units which should alleviate the problem.

2.5.3.2 Currently within Gloucestershire Constabulary the updating of the PNC as a result of the arrest summons process is an entirely manual procedure. The Force are

however, progressing an IT solution with their software suppliers to electronically submit a partial record to the PNC from the Unity custody system. HMIC PNC Compliance Auditors encourage the Force to continue to seek such a solution.

- 2.5.3.3 The Force has invested in scanners for each of the custody units in order to forward the PHO1 document from the custody unit to the Phoenix Bureau. It was reported that the scanning machines do not provide evidence that the PHO1 has been transmitted. Therefore, the police officer or the CDO has no way of knowing if the PHO1 has been received for input. Consequently by the time the Phoenix Bureau chase the outstanding form the 24 hour input target is unlikely to be achieved.

**Recommendation 12**

**Her Majesty's Inspector of Constabulary recommends that the Force considers introducing a facility to alert the police officer or the CDO when the PHO1 fails to be transmitted.**

- 2.5.4 Update of Police Bail Data

- 2.5.4.1 Gloucestershire Constabulary is one of a few forces in England and Wales that have commenced updating arrest/summons records for cases where an offender has been released on Sec.47(3) police bail, and for recording all offenders on the PNC where DNA and fingerprints can be taken. This has resulted in the Force having to process an increasing number of A/S reports each month: between June and July 2004 the monthly volume went up by over 40%. The Force has been given credit for undertaking this task.

- 2.5.5 Ad-Hoc Intelligence Updates

- 2.5.5.1 In relation to ad hoc intelligence updates, for example, a change of address of a person known to have a PNC record, there was a poor level of awareness of the procedure for updating the information on the PNC. Whilst the local intelligence system was being updated, there was evidence from the Focus Groups that PNC was not being updated with the ad-hoc information as the police officers were not aware of the process.

**Recommendation 13**

**Her Majesty's Inspector of Constabulary recommends that the Force introduce a robust procedure for police officers to add ad-hoc information to the PNC in order to improve the quality of data on the system.**

## 2.5.6 Phoenix Bureau

2.5.6.1 The Phoenix Bureau was set up within the CJU department in April 2004. However, currently the majority of the staff are employed from agencies and the three sections within the bureau are task specific, with each section only updating one aspect of the PNC. HMIC PNC Compliance Auditors are aware that Gloucestershire Constabulary has a long term strategy to employ staff on a permanent basis and to work towards multi-skilling across the bureau. HMIC PNC Compliance Auditors would encourage the Force to adopt this strategy as it will provide a corporate resilience for the updating of the PNC names records.

## 2.5.7 Availability of PNC Checks

2.5.7.1 Although the availability of PNC checks across the radio system was reported to be good, the evidence from focus groups regarding telephone checks was not so positive. This is exacerbated as staff in the PNCB are perceived as the PNC experts throughout the Force but the Bureau does not offer a 24/7 service. As a result police officers are unsure how to obtain a VODS and QUEST check out of PNCB office hours. Some officers believed that they could contact a neighbouring force for an out of hours VODS and QUEST check, yet there is no formal agreement between the two forces. A further example of PNC's restricted availability to operational officers is highlighted by the PSG's decision to restrict the access to the DVLA driving licence database to just the PNCB. This again results in the facility not being available to Gloucestershire police officers out of hours, see recommendation 8 of this report.

## 2.5.8 Originator Line

2.5.8.1 The originator line on PNC is a free text field of 72 characters that should be used to record the reason for carrying out a transaction. It is good practice to include a reference to a force record in this field and also the collar number (or equivalent) of the person requesting the PNC check. The field should also be supported by an appropriate reason code derived from a pre-set list. The use of the field, requirements for particular types of information and the reason codes are laid down in Volume 1 of the PNC User Manual.

2.5.8.2 Furthermore, a reality check by HMIC PNC Compliance Auditors of a random sample of approximately 100 transactions carried out by the Force revealed a 15% error rate on the originator field, including some errors relating to incorrect reason codes. If the originator line field is not correctly completed, accompanied by the appropriate reason code, it is not possible for officers to be able to use this field

readily as part of an investigation. HMIC PNC Compliance Auditors believe that a reinforcement of the policy amongst PNC trained staff should help to reduce this figure.

#### **Recommendation 14**

**Her Majesty's Inspector of Constabulary recommends that the Force reissues and reinforces the policy on the correct use of the originator line and the reason codes. The policy should include the requirements for certain information and an explanation of the investigative capabilities of the information to assist operational policing.**

## **2.6 Results**

- 2.6.1 Gloucestershire's performance in respect of inputting A/S results reached a peak in March and April of 2004 when the Force achieved 84.8% and 84.6% within 24 hours, which was just above the national average, but below the ACPO target of 90% within 24 hours. Unfortunately the Force's performance has since dipped with just 72% of A/Ss being input within the 24 hour target in July and August. However, considering the substantial increase in the number of A/Ss that the Phoenix Bureau now has to enter and given that Gloucestershire input a full record using a completely manual process, HMIC PNC Compliance Auditors recognise the hard work that has been undertaken to achieve this level of performance. HMIC PNC Compliance Auditors also acknowledge the changes that have been made, particularly within the CJU, to enable the Force to achieve this. However, it must also be noted that the Force is not achieving the ACPO target of 90% of A/S reports being entered within 24 hours. Consequently, the Force is encouraged to consider pursuing the partial electronic interface facility as already discussed in paragraph 2.5.3.2 and recommendation 12, both of which have the potential to enable the Force to move nearer to the ACPO target.
- 2.6.2 The input of court results has been an area of concern within Gloucestershire Constabulary for some time. In August 2003 they were the second poorest performing force in England and Wales, when 0.7% of court results were entered within 7 days. However, the steps the Force has taken in working with the magistrates courts through the LCJBs is recognised by HMIC PNC Compliance Auditors, along with the organisational changes the CJU have made in order to cope with the backlog of court registers being sent through from the magistrates courts. Gloucestershire has improved the percentage of results entered within 7 days to 13.6% in August 2004, and since the inspection this figure has increased to 37.4% in September 2004. However, it is still early days, both in terms of clearing the court backlog where entering old court results can have a detrimental effect on the PITO figures, and in terms of the establishment of the Phoenix Bureau. Consequently, HMIC PNC Compliance Auditors still remain to be reassured in this area although they are hopeful that the Force has made the changes that will enable them to continue to improve.
- 2.6.3 HMIC PNC Compliance Auditors are reassured that the Phoenix Bureau has a system established to regularly review the IPs of more than a year old. Over the

last 12 months outstanding IPs have been reduced by 1,300 which represents a percentage reduction of 28%. The Force will need to ensure that it has the resources available to continue to regularly review IPs of more than one year old. This is of particular importance as the IPs are likely to increase before stabilising at a higher level as a result of the Force inputting 47(3) bail and all the offences where DNA and fingerprints can be taken.

- 2.6.4 It was reported to the HMIC PNC Compliance Auditors that the Phoenix Bureau inputs court bail for both the magistrates and the crown court on to the PNC, thus complying with national PNC Policy.
- 2.6.5 A graph illustrating these figures can be seen in Section 1 of this Report at paragraph 1.4.7.
- 2.6.7 The recommendations outlined so far in this report aim to improve the quality of the data being input and to assist Gloucestershire Constabulary to achieve the targets of 90% Arrest/ Summons within 24 hours and 100% of court results being entered within 72 hours of receipt from the courts. They should also provide the Force with opportunities to maximise the use of the PNC and increase the levels of awareness of officers regarding the investigative capabilities of the system.

## Appendix A

### **A Summary of Good Practice within Gloucestershire Constabulary:**

- The arrest summons timeliness performance are broken down on a divisional basis and circulated to the Divisional Commanders within the monthly performance improvement report.
- Service Level Agreements sent out to the Non Police Prosecuting Agencies
- The input of S.47(3) police bail and the details of all offenders who can have their DNA and fingerprints Taken as a result of the change to legislation made by the 2003 Criminal Justice Act.

## **Summary of Recommendations for Gloucestershire Constabulary**

### **Recommendation 1**

Her Majesty's Inspector of Constabulary recommends that Gloucestershire Constabulary expands its current system of performance monitoring to include information on the quality of data submitted for input to the PNC.

### **Recommendation 2**

Her Majesty's Inspector of Constabulary recommends that Gloucestershire Constabulary urgently considers a formally documented strategy for PNC, either a PNC Strategy in its own right or incorporated into a local Information Management Strategy (See Recommendation 2 – Appendix E). The document should be supported by an action plan covering the recommendations of this report and all previous reports where no progress has been made. The action plan should contain specific objectives, to be attained within certain timescales and ownership of issues to be attributable to individuals.

### **Recommendation 3**

Her Majesty's Inspector of Constabulary recommends that the Force reviews, and senior officers enforce, its procedural documents in connection with the PNC to ensure that they cover all aspects of PNC information and supporting documentation.

### **Recommendation 4**

Her Majesty's Inspector of Constabulary recommends that the Force has the appropriate procedures in place to ensure that all staff are given training and adhere to the 1990 Computer Misuse Act.

### **Recommendation 5**

Her Majesty's Inspector of Constabulary recommends that the Force ensure that the levels of access to the PNC are appropriate to the level of training and role of the operator.

### **Recommendation 6**

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

- (a) Review the current annual audit plan to consider increasing the number of audits undertaken by the Data Protection Unit.
- (b) Allocates the ownership of the audit recommendations to the PSG to ensure that all relevant action is undertaken.
- (c) Adopt consistent audit methodologies across the Divisions. These could be developed by the PNC Working Group.

**Recommendation 7**

Her Majesty's Inspector of Constabulary recommends that the Force evaluates the current method of transaction monitoring to determine whether it is effective and robust in preventing and detecting abuses of PNC access.

**Recommendation 8**

Her Majesty's Inspector of Constabulary recommends that the Force ensures that VODS and QUEST checks can be obtained on a 7 day, 24 hour basis and that this is communicated. This will either entail a 24/7 facility within force or by making reciprocal agreements with one of the larger surrounding forces.

**Recommendation 9**

Her Majesty's Inspector of Constabulary recommends that the Force introduce a PNC training policy document that provides for:

- (a) A formal assessment process prior to access being given to the PNC.
- (b) The provision of refresher training.
- (c) A regular review of the length and content of the PNC courses delivered.

**Recommendation 10**

Her Majesty's Inspector of Constabulary recommends that the Force continues to develop its liaison with the local Magistrates and Crown Courts to ensure that the Court personnel are aware of the expectations of the Police with regard to inputting of court results onto the PNC so that the speed of the results being sent to the Phoenix Bureau is improved. In addition, the Force should progress the issue of the missing results with all relevant parties, such as the Courts, the CPS and the Magistrates Court Inspectorate, in order to find a timely resolution.

**Recommendation 11**

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

- (a) Provides formal feedback to the divisions on the quality of information being provided by their officers in the form of specific advice to individual officers in addition to the overall divisional quality statistics, as described in Recommendation 1 of this report.
- (b) Introduces a formal quality assurance process within the Phoenix Bureau for the update of PNC data, to include the update of Warning Signals where appropriate.

**Recommendation 12**

Her Majesty's Inspector of Constabulary recommends that the Force considers introducing a facility to alert the police officer or the CDO when the PHO1 fails to be transmitted.

**Recommendation 13**

Her Majesty's Inspector of Constabulary recommends that the Force introduce a robust procedure for police officers to add ad-hoc information to the PNC in order to improve the quality of data on the system.

**Recommendation 14**

Her Majesty's Inspector of Constabulary recommends that the Force reissues and reinforces the policy on the correct use of the originator line and the reason codes. The policy should include the requirements for certain information and an explanation of the investigative capabilities of the information to assist operational policing.

## Appendix B

### **Thematic Inspection Report on Police Crime Recording, the Police National Computer and Phoenix Intelligence System Data Quality - 'On The Record'**

#### **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 C

### 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 D

### Police National Computer Data Quality and Timeliness – 1<sup>st</sup> Report

#### 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 E

### Police National Computer Data Quality and Timeliness – 2<sup>nd</sup> Report

#### 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.