



LINCOLNSHIRE POLICE

2 – 5 AUGUST 2004

POLICE NATIONAL COMPUTER

COMPLIANCE REPORT

Report Contents

| | | |
|----|--|----|
| 1. | 1 Executive Summary | 2 |
| | 1.1 Introduction | 2 |
| | 1.2 Background | 2 |
| | 1.3 1.3 Methodology | 3 |
| | 1.4 1.4 Current Performance..... | 4 |
| | 1.5 1.5 Conclusions | 6 |
| 2. | Detailed Findings and Recommendations | 8 |
| | 2.1 Leadership..... | 8 |
| | 2.2 Policy and Strategy..... | 9 |
| | 2.2.2 PNC Strategy..... | 9 |
| | 2.2.3 Custody Policy | 9 |
| | 2.2.4 Communication..... | 10 |
| | 2.2.5 Security..... | 10 |
| | 2.2.6 Data Protection Audits | 11 |
| | 2.3 People | 12 |
| | 2.3.1 PNC Awareness/Marketing | 12 |
| | 2.3.2 Training..... | 13 |
| | 2.5 Processes..... | 15 |
| | 2.5.2 Quality of Data | 15 |
| | 2.5.3 Submission of the PNC Source Input Document..... | 16 |
| | 2.5.4 Update of Police Bail Data | 16 |
| | 2.5.5 Offence Processing..... | 17 |
| | 2.6 Results..... | 17 |
| | Appendix A..... | 19 |
| | A Summary of Good Practice within Lincolnshire Police: | 19 |
| | Summary of Recommendations for Lincolnshire Police | 20 |
| | Recommendation 1 | 20 |
| | Appendix B..... | 23 |
| | Thematic Inspection Report on Police Crime Recording, the Police National Computer and Phoenix Intelligence System Data Quality - 'On The Record' | 23 |
| | Appendix C | 25 |
| | PRG Report "Phoenix Data Quality" Recommendations | 25 |
| | Appendix D | 27 |
| | Police National Computer Data Quality and Timeliness – 1 st Report | 27 |
| | Appendix E..... | 29 |
| | Police National Computer Data Quality and Timeliness – 2 nd Report | 29 |

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 Lincolnshire Police between 2nd and 5th August 2004.

1.1.2 Lincolnshire Police 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 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 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 Lincolnshire is a large county in the east of England covering in the region of 2,284 square miles. It borders the North Sea and the Wash. It is one of the main agricultural counties in Great Britain with a population of approximately 647,600 comprising of some 272,150 households. The county welcomes in excess of 18 million visitors each year.

1.2.2 The Force is headed by the chief officer group, led by the Chief Constable, supported by the Deputy Chief Constable (DCC), an Assistant Chief Constable (ACC). The Force strength comprises approximately 1,270 full-time equivalent police officers, 725 police staff, 160 special constables and 40 police community support officers

1.2.3 For general policing purposes the Lincolnshire Police area is divided into three territorial divisions, where a Chief Superintendent leads each division. The Divisional Commander is supported by a chief inspector operations and a chief inspector community safety. In addition, each has a personnel manager and an administration manager providing business support to the team. Headquarters contains all the Force's operational and non-operational support departments.

1.2.4 At Lincolnshire Police the main updating of the PNC is carried out by the Phoenix section within the Criminal Justice Information Unit (CJIU) based at the Force headquarters in Nettleham. The Phoenix section operates 24 hours a day, 7 days a week. Currently the majority of the PNC names records are updated via a download from the Force's Criminal Intelligence System (CIS). The initial details are entered onto the CIS from the crime form, known in force as a P62J. The source input document for PNC (known in Force as a P83), is completed by the

arresting officer, the front page is then faxed through to the CJIU so those partial details can be entered onto the CIS. That information is then downloaded to the PNC. The full PNC names record is then updated by the CJIU (again via the CIS) once the completed P83 document is received from the police officer.

1.2.5 Lincolnshire Police have installed the NSPIS (National Strategy for Police Information Systems) Custody system in the custody unit at Boston Police Station which lies within the East Division. This requires the Force to undertake double keying as they are continuing to keep the CIS updated as well as the NSPIS custody application. There is no facility to link NSPIS Custody and the CIS, so each system has to be updated separately.

1.2.6 The Force has also installed the NSPIS Case Preparation system into the Criminal Justice Units (CJU), based within the headquarters of each of the three divisions. The CJUs are responsible for updating the magistrate court results from the paper court register onto the CIS, which then downloads that information onto the PNC. The CJUs also have to enter the result onto the NSPIS Case Preparation system as there is no electronic link between NSPIS and the Magistrates Courts. The CJUs only enter the final court result, no court adjournments details are updated onto the PNC.

1.2.7 The results from the crown courts are entered onto the PNC by the Phoenix section within the CJIU. Although the Crown Court fax the court results to the CJIU it was reported that the detail is insufficient, so the court results are not updated on the PNC until the paper register is received. The Lincolnshire courts fax through the bail conditions to the CJIU to enable them to update the PNC with those details.

1.2.8 The Phoenix section is responsible for entering Wanted/Missing (W/M) reports, disqualified driver reports, vehicle and property reports; the keywording of modus operandi (MO) which is required to enhance QUEST (Queries Using Extended Search Techniques) searches, accepting, circulating and sending PNC broadcasts. The 'hot desk' within the section provides police officers with telephone PNC enquires and VODS (Vehicle On-Line Descriptive Searches) and QUEST searches.

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

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 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: -

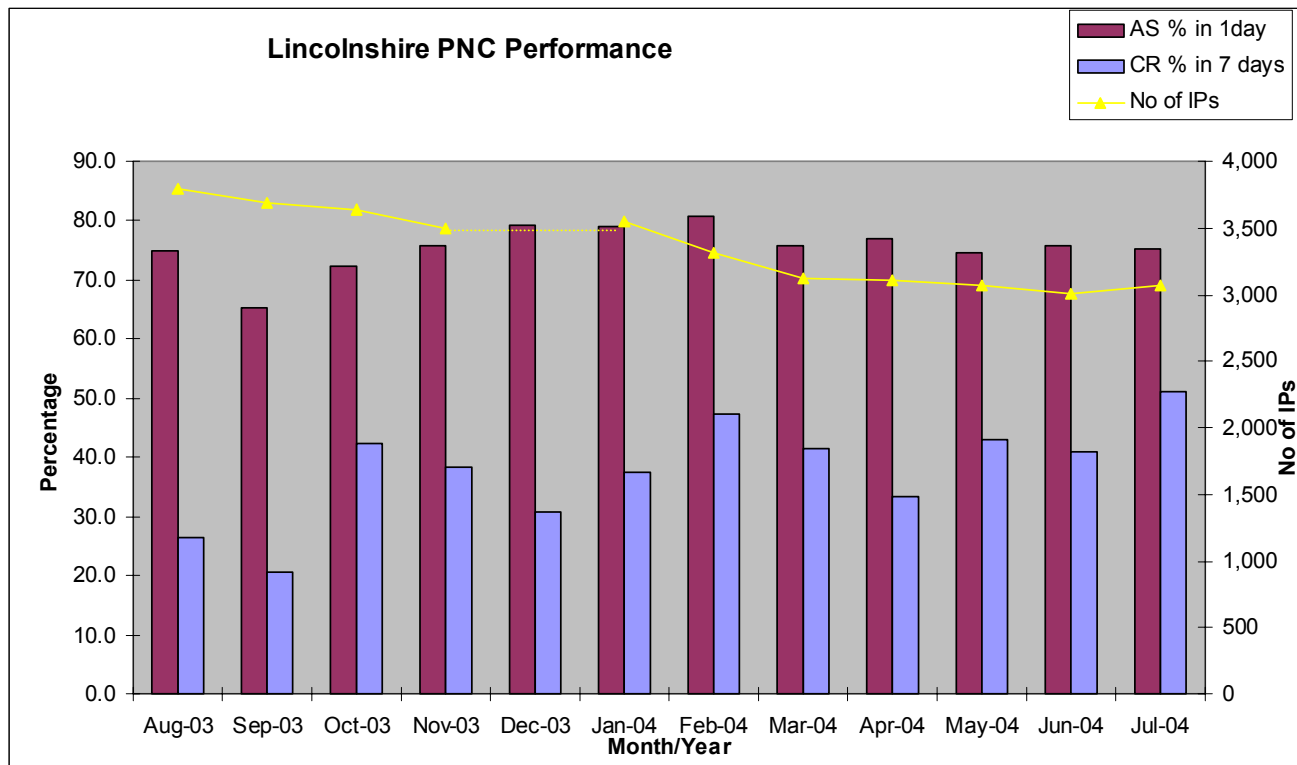
- i. i. Arrest/Summons – 90% of cases to be entered within 24 hours (where forces are using skeleton¹ records as initial entry, full update must be achieved within 5 days).
- ii. ii. Bail Conditions – Entry of Police Bail within 24 hours.

¹ 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

- iii. lli. 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.)

- 1.4.4 In July 2004 Lincolnshire Police entered 75.2% of Arrest Summons (A/S) reports within the 24 hour target. However, the English and Welsh average is 80.4% and the ACPO target is 90%. A similar trend is also shown in the days to enter the quickest 90% of AS reports with the figure being 13 days in July 2004 and the English and Welsh average being 9 days for the same period. Although in the previous 12 months Lincolnshire's performance in this area has only fallen below 70% once (65.4% in September 2003), it has conversely only reached 80% (February 2004) once in the same time span. The concern is that there have been no signs of consistent improvement.
- 1.4.5 A similar trend is exhibited with regard to the input of court results. In July 2004 Lincolnshire entered 51.1% of court results within 7 days, where the English and Welsh average was 53.6%. In the previous 12 months the highest figure achieved is for the current month, with a low of 20.5% in September 2003. The days to enter the quickest 90% of court results have also been very variable over the last 12 months, with the worst being 307 days in November 2003 and the best being 19 days in March 2004. Again, it is the inconsistency and the lack of a steady improvement in this area that is the concern.
- 1.4.6 In terms of Impending Prosecutions (IPs), the overall outstanding number of IPs for Lincolnshire Police have reduced from 3,788 in August 2003 to the current 3,073 showing a decrease of 19% 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. HMIC Compliance Auditors are aware that the CJIU are currently in the process of reviewing outstanding IPs of more than a year old. It was reported to them that it will be another 6 months before the process is complete. After which there will be a system in place within the Phoenix section to make this a monthly task.
- 1.4.7 A graph illustrating Lincolnshire's performance in the 12 months to July 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 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:

- The Force relies on the local CIS system both from the aspect of providing intelligence information to police officers and to transfer data to the PNC. This transfer of information occurs at the arrest summons and the court resulting stage of the process. However, the installation of NSPIS Custody and Case Preparation has resulted in the Force embarking on a process of double keying of information to ensure that the CIS application is maintained. The Force is therefore unlikely to achieve any business benefits from this new technology, neither is it any closer to reaching the ACPO performance targets for the PNC.
- The Force has been unable to achieve the performance targets of the ACPO Compliance Strategy for PNC in the 12 months to July 2004. Her Majesty’s

Inspector of Constabulary remains to be convinced that the Force is in a position to improve on its performance in the next 12 months.

- Awareness of the full functionality of the PNC and its benefits to operational policing activities is limited throughout the Force and this may be attributed to the lack of awareness training and marketing of PNC in the force.
- There has been no independent auditing conducted of the PNC data within the Force for 2 years.
- Her Majesty's Inspectorate of Constabulary has found weaknesses in all six sections of the protocols.
- Her Majesty's Inspector is concerned that the Force has not made any 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, 1st Report, *published 2001*
- HMIC Report – 'PNC Data Quality and Timeliness, 2nd 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 The pre-read material as requested by the HMIC PNC Compliance Auditors showed that Lincolnshire Police had not held a PNC Steering Group (PSG) meeting since January 2003, although they were made aware that another was held during the week of the visit. HMIC PNC Compliance Auditors are of the opinion that regular meetings of a PSG provides a useful vehicle to bring together both strategic views of the chief officers and key PNC stakeholders throughout the force. The re-establishment of such a group would also enable the Force to devise long term strategic objectives for its use of the PNC, take ownership of relevant actions and provide a forum to discuss and action any performance issues thus ensuring that the Force is obtaining maximum benefit from the system.

2.1.2 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.

2.1.3 It was encouraging to learn that the A/S Performance Indicators are broken down on a divisional level and circulated to the Divisional Commanders. However, the PNC performance statistics do not feature in the Divisional Performance Reviews, consequently, it was felt that there is no accountability for the Divisions' performance in this area.

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that the PNC Steering Group be revitalised with representation from relevant stakeholders within the Force, thereby enabling the Force to devise long term strategic objectives for its use of the PNC, and provide a forum to discuss and action any performance issues. In order to improve and subsequently maintain the profile of PNC, the Steering Group should be chaired by an ACPO rank.

2.1.4 It was reported to the HMIC PNC Compliance Auditors during the inspection that there are plans to establish a PNC User Group, to be chaired by the Head of CJIU and reporting to the PSG.. HMIC PNC Compliance Auditors are aware of a number of forces throughout England and Wales where similar sub groups are employed to implement the strategic decisions from the PSG. The PNC User Group also assists with the dissemination of any changes made to the PNC, communicates PSG decisions and pass items to the PSG for discussion at the

appropriate level. Lincolnshire are encouraged to establish a PNC User Group encompassing the responsibilities as described above.

2.2 Policy and Strategy

2.2.1 With regard to policy and strategy, the inspection covered a number of areas that warrant a review. These can be described under four broad headings: PNC Strategy; Custody Policy, Communication, and Security and Data Protection Audits. 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, currently at Lincolnshire Police there is only a draft PNC strategy document.

2.2.2.2 A formalised strategy document, covering topics such as the operational use of the PNC, training, and security would provide a framework for continued improvement in the efficiency and effectiveness of PNC usage. It would also allow the Force to give 'ownership' of issues to individuals or departments, and generate a more 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 Lincolnshire Police 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 Custody Policy

2.2.3.1 HMIC PNC Compliance Auditors acknowledge that there is guidance provided on the Force intranet and a booklet is in existence regarding the procedures surrounding the submission of the P83s however, this is not in the opinion of the HMIC PNC Compliance Auditors a formalised Force wide custody policy. In its current format the procedural guidance is split between the two documents which could lead to uncertainty as two documents have to be accessed instead of one.

- 2.2.3.2 In addition, the lack of a custody policy diminishes the ability of the Force to implement accountability in respect of the submission of the P83. Through focus groups, HMIC PNC Compliance Auditors learned that officers were aware that a P83 had to be submitted by the end of the tour of duty but some were unaware of the reasons for doing so.
- 2.2.3.3 The statistics produced by the CJIU manager on a monthly basis show a difference in the performance of each division, no reasons have been identified by the Force for this difference. The establishment of a Force wide custody policy could resolve any divisional inefficiencies that have evolved.
- 2.2.3.4 The Force has an ideal opportunity to do this with the roll out of the NSPIS Custody application across the force. The NSPIS Custody training could include the guidance needed to introduce of this policy.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that a Force policy detailing the custody process including the completion of the P83 Source Input Document (SID) and the paper SID is published and enforced to ensure consistency of process. The policy must include the responsibilities of officers and police staff at all levels, including custody suites, arresting officers and the CJIU.

2.2.4 Communication

- 2.2.4.1 During the course of the inspection it became apparent that the levels of knowledge and understanding of the functionality of the PNC varied throughout the Force at the operational level. There was some concern that recent changes to the PNC (for example the introduction of the driving licence database) had not been communicated to the operational police officers. HMIC PNC Compliance Auditors were encouraged to note however, that Lincolnshire Police have plans to form a PNC User Group that will be able to implement the strategic decisions from the PSG along with assisting with the dissemination of any changes made to the PNC. It will be able to widely communicate PSG decisions and pass items to the PSG for discussion at the appropriate level.

2.2.5 Security

- 2.2.5.1 It was reported to the HMIC PNC Compliance Auditors that the Data Protection Officer delivers an input on responsibilities of employees regarding Data Protection and Information Security on the Police Staff Induction Course and to the Police probationers. However, during focus groups it was discovered that PNC access is sometimes shared and that terminals are left logged on. Whilst the integrity of the employees of Lincolnshire Police is not in question, the responsibilities of employees to ensure the security of all computer systems is quite specific under the 1990 Computer Misuse Act.

2.2.5.2 Transaction monitoring is a function carried out by the Data Protection Office. Six transactions are validated on each day Monday to Friday 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 Office. Responses are reviewed by the Data Protection Officer who either files the check or may conduct further investigation. Each Division is also responsible for sending out a further 20 transaction enquiries per month. In addition, the central communication centre is soon to carry out another 50 PNC transaction checks per month.

2.2.5.3 However, the HMIC Compliance Auditors were concerned to learn that there had been no transaction monitoring carried out by the Data Protection Office for the past six months, due to a reported staff shortage. Furthermore, during discussions at the focus groups it was revealed that they did not feel that the transaction monitoring was a deterrent to the misuse of the PNC.

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 on Information Security, including the 1998 Data Protection Act and 1990 Computer Misuse Act.

2.2.6 Data Protection Audits

2.2.6.1 Data Protection audits are the responsibility of the Data Protection Officer (DPO) at Lincolnshire Police. The DPO adopts good practice, as outlined in the ACPO Data Protection Manual, by producing an annual risk based strategic audit plan which has the PNC as its main focus. However, the HMIC PNC Compliance Auditor questions the value of such a process as the DPO stated that no audit activity has taken place for two years due to a claimed lack of resources. In the current situation it is unlikely that the Data Protection team will be able to instigate the 2004 plan.

2.2.6.2 The PNC Code of Connectivity mandates the requirement for PNC audits in accordance with Section 2 of the ACPO Manual for Data Protection Management.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that the Force urgently review the situation within the Data Protection Unit to enable formal data protection audits to be conducted against the PNC data.

2.2.6.3 HMIC PNC Compliance Auditors were informed of the introduction of an automatic auditing system to review Wanted/Missing and vehicle reports. The system is

scheduled to be introduced in August 2004 and will generate an email to the report owner every 90 days to check the report's validity. However, although this will be viewed as good practice once it is in operation, the automatic review will not guarantee that the reports are appropriate to be entered onto the PNC, nor will it check that the phrasing of the reports to ensure that they adhere to the guidelines in the PNC Manual. It is only the use of PNC audits as per the ACPO Data Protection Manual that will provide assurance to the Force in these issues.

2.3 People

2.3.1 PNC Awareness/Marketing

2.3.1.1 During the course of the inspection it became apparent that the levels of knowledge and understanding of the functionality of the PNC varied throughout the Force at all levels. In particular, meetings and focus groups showed that while the PNC basic enquiry facilities and VODS (Vehicle On-line Descriptive Search) were generally well known, other areas were less understood and officers' knowledge of the QUEST functionality was limited. It is therefore likely that maximum advantage is not being gained from the PNC and, indeed, the need to submit accurate and timely information is more difficult to enforce as police officers do not appreciate the benefits.

2.3.1.2 It was reported that information relating to enhancements to PNC in the past two years – such as the introduction of the insurance details and driving licence information - was communicated to them through a number of mediums such as email, routine orders and word of mouth, none of which are totally reliable.

2.3.1.3 An effective PNC marketing policy administered through the PNC sub group would enable the focus of efforts and help ensure that the Force is gaining maximum return on it's investment in the system and that officers gain most benefit from the information which is stored on it. The marketing of PNC needs to be viewed as an ongoing process where marketing strategies are employed, such as posters and the PITO roadshow, to encourage interest and awareness in the PNC on a rolling programme basis

2.3.1.4 HMIC PNC Compliance Auditors are aware that the Force had arranged for PITO to attend the FHQ in June 2004 and give a presentation. The pre-read also contained a draft marketing policy.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that the Force adopts a structured approach to marketing, by way of a formal marketing or communication strategy, ensuring that awareness amongst operational staff is raised to an appropriate level.

2.3.2 Training

- 2.3.2.1 Lincolnshire Police do not have a formal PNC training strategy document. It was reported during the focus groups and interviews that the availability of PNC training has been limited over the past two years. Employees reported applying for PNC enquiry courses and receiving no feedback as to whether they had been refused a course or were on a waiting list. A formal PNC training policy would ensure that personnel were aware of the availability of courses and the criteria used to determine the offer of a place on a PNC course.
- 2.3.2.2 Lincolnshire Police only employ Centrex accredited PNC trainers which conforms to recommendation 13 of "On the Record" (see Appendix B). Furthermore, the competence of all staff attending PNC training courses is assessed before they are given access to the system. The PNC training is modular, enabling employees to attend the training courses that are applicable for the parts of the PNC that they need for their role, this approach is considered as good practice.
- 2.3.2.3 The PNC accredited trainers provide an input at Stage 3 on the probationer training. The probationers are given an overview of the information contained on the PNC, how to obtain a PNC check and how to complete a P83. This is considered to be good practice.
- 2.3.2.4 The force have decided to train all probationers on a five day PNC enquiry course during Stage 6 of their training. 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. The force also needs to review its training regime and consider the demands from existing staff who have submitted requests to be PNC trained.
- 2.3.2.5 During interviews and focus groups, HMIC PNC Compliance Auditors were advised by PNC trained staff that following their initial training on the system, in some cases over ten years ago, no further training has been provided, despite a number of significant developments to the system. However, in order to reduce abstraction rates amongst staff, the Force may wish to adopt a practice of other forces whereby PNC trained staff are required to sit the assessment that is offered at the end of the enquiry course. The use of the assessment ensures that only staff who have not maintained their skills require refresher training to retain their access to the system.

Recommendation 7

Her Majesty's Inspector of Constabulary recommends that the Force introduce a PNC training strategy document that covers:

- (a) Training provision for new and existing employees including the criteria for acceptance on a course.**
- (b) The provision of refresher training.**

2.3.3 Quality Assurance

2.3.3.1 During the inspection, HMIC PNC Compliance Auditors learned that the Phoenix section supervisors quality assure 100% of the PNC input (via the CIS) of inexperienced staff and 10% of the skilled PNC updaters. Unfortunately, due to reported staff shortages the supervisors only currently check 5% of the work input by the experienced staff onto the CIS. HMIC PNC Compliance Auditors consider the checking of 10% of the skilled updaters to be an appropriate level, and would encourage Lincolnshire to return to that level of quality assurance.

2.3.3.2 It was reported during interviews that there were a number of new employees taken on by the CJIU last year and a belief that in the need for expediency their training was too condensed. The new employees were expected to attend the next training course before they had fully mastered the procedures taught in the previous course. HMIC PNC Compliance Auditors are supportive of a structured and modular approach to the training of staff for the CJIU. The manager and supervisors could consider a mentoring system combined with a competency based approach to the probationary period, where the new employee has to attain a quality level before they are allowed to progress with any further training.

2.4 Partnerships and Resources

2.4.1 The relationship Lincolnshire Police has with their local magistrates and crown courts appears to be variable. The Force has an agreement with the local court to fax through bail conditions so that these can be input onto the PNC. However, it was reported that not all the subsequent updates to the bail conditions are received and that courts have to be reminded to provide these details along with legible copies.

2.4.2 The HMIC Compliance Auditor is aware of a number of forces throughout England and Wales who have taken a variety of steps to negotiate with their local magistrates and crown courts for the timely transfer of court results. This has generally been achieved by developing relations with the courts through the Local Criminal Justice Boards. In addition, recommendation 6 (a) of the HMIC PNC Data Quality and Timeliness 1st Report, produced in 2001, actively encouraged Forces to develop good relations with the relevant stakeholders within this area, see appendix D of this report.

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that the Force improves its liaison with the local Magistrates and Crown Courts. This should ensure that the Court personnel are aware of the expectations of the Police with regard to inputting of court results onto the PNC and improve the speed of the results being sent to the CJUs and the CJIU.

- 2.4.3 The HMIC PNC Compliance Auditors suggest that the Force develops its relationships with Non Police Prosecuting Agencies (NPPA) to assist in achieving the target of 90% for Arrest/Summons reports being entered within one day. Currently, the Force often first hears of a prosecution by an NPPA when the court results are received by the Phoenix section. This affects the A/S figures for the Force. Nationally, NPPA prosecutions account for less than one in ten of all prosecutions and whilst this forms a small percentage of the total in Lincolnshire Police, inputting them at the correct stage of the process would assist the Force in achieving the 90% target.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that options be explored to improve the relationship with Non Police Prosecuting Agencies (NPPAs), to develop an awareness of their expected performance in this area.

2.5 Processes

- 2.5.1 HMIC PNC Compliance Auditors found a number of opportunities for improvement in the management of PNC information. These improvements can be broadly described under the following headings: quality of data; submission of source input documents; update of police bail data and offence processing.

2.5.2 Quality of Data

- 2.5.2.1 As a result of reality checks on P83s submitted to the CJIU, HMIC PNC Compliance Auditors found a number of errors that are of concern. Eight errors were found where the CIS had been updated, but the updates had either not transferred to the PNC or had produced data on to the PNC that did not reflect the correct situation. These related to description details, changes in the subject's address and tattoos, all of which are details that are searchable through the QUEST facility. These findings were based on a small sample of 14 documents that were examined during the reality checks. The likelihood of detecting an error in such a small sample is low, therefore detecting these high instances indicates that the error rate could be significant.

- 2.5.2.2 On subsequent discussions with the Force it was reported that an upgrade to the local CIS system had caused the majority of these errors to occur, as data that was previously being downloaded onto the PNC was now failing to do so. In addition, when the Phoenix section supervisors quality assure the updaters input they checked the paper P83 against the CIS system, believing that the data entered into the CIS completely transfers to the PNC. Consequently, the loss of information being transferred to the PNC as a result of the upgrade to the CIS application had not been detected.

Recommendation 10

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

- (a) Satisfies itself that PNC data transferred after the installation of the upgrade to the CIS system is accurate.**
- (b) Guarantees that any future upgrades are thoroughly tested prior to their introduction.**
- (c) Ensures that the quality assurance process includes checking the PNC record for the accuracy of the data.**

2.5.3 Submission of the PNC Source Input Document

2.5.3.1 The feedback from the focus groups was that officers are generally aware of their responsibility to submit the P83 by the end of their shift. Difficulties arose when the police officers failed to provide the CJIU with sufficient information to enable them to update the CIS which subsequently transfers the details to the PNC. This is despite the front sheet of the P83 having been redesigned to make it easier for the officer to provide the mandatory information required. Another area of concern is with the submission of reprimands, final warnings, cautions and NFAs (No further actions). It was reported that the P83 was often received well outside the 24-hour target. The lack of an up to date custody policy, as discussed in paragraph 2.2.3.1 and recommendation 3, reduces the likelihood of enforcing accountability in respect of these issues. In addition, the lack of knowledge concerning the benefits of updating and subsequently using the information stored within the PNC will not encourage police officers to provide quality data in a timely manner. The Force is therefore encouraged to market the benefits of the PNC in line with recommendation 6.

2.5.4 Update of Police Bail Data

2.5.4.1 Lincolnshire Police do not currently record cases, which are subject to police bail on the PNC, although they do record the information on the local CIS. It is therefore possible that officers in the adjoining policing areas are checking records on the PNC which do not include the most up to date information of recent arrests and other vital details which may assist in the custody sergeants' decision-making process. The Force may also lose the opportunity to retain DNA and fingerprints on the national database since it is not possible to retain information on these databases without a supporting Arrest/Summons number

2.5.4.2 The electronic interface between CIS and PNC is unable to transfer police bail, and whilst the force is able to manually input this information they are unable to automate the process until their suppliers change the interface, and PITO make changes to PNC. HMIC Compliance Auditors recognise the difficulties in managing this change but would encourage the force to continue their dialogue with the suppliers and PITO to make sure these changes are kept as a priority.

Recommendation 11

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

- (a) Gives consideration to establishing policy and procedures in order to record police bail information on the PNC and thus benefit from the additional forensic data stored on the national database.**
- (b) Continues to liaise with their Interface suppliers and PITO to have the necessary changes made to allow the automatic inputting of Police Bail.**

2.5.5 Offence Processing

2.5.5.1 It was reported during interviews and focus groups that the three CJUs based on the divisions employ different procedures, which by the very nature must mean that some are better than others, yet the practice continues and consistent good practice is not being captured.

2.5.5.2 HMIC PNC Compliance Auditors are aware of a number of Forces who have undertaken a complete review of the offence process and have employed a "cradle to grave" approach to ensure the efficient use of resources. The reviews have included an intensive scrutiny of all the IT systems used in this process.

2.5.5.3 With the introduction of the NSPIS applications of Custody and Case Preparation, the Force will need to appraise its business processes to ensure that it benefits from the installation of the new technology. The force may wish to prioritise the IT systems to reduce the amount of double keying that is currently taking place. It should also consider reviewing their procedures for recording of conviction data, currently it is recorded on CIS and PNC, being doubled keyed into each system. They should assure themselves of the business benefits of recording the same information on both systems.

Recommendation 12

Her Majesty's Inspector of Constabulary recommends that the Force gives consideration to reviewing the entire offence processing procedures in order that it is able to benefit from the installation of NSPIS Custody and Case Preparation applications and move closer to achieving the ACPO PNC performance indicators.

2.6 Results

- 2.6.1 It is of concern to note that a year ago in July 2003 Lincolnshire Police was inputting 71.2% of A/S reports within 24 hours where the national average figure was 73%. A year later in July 2004, Lincolnshire's figure has increased to 75.2%, but the national average is now 80.4%. The ACPO target is still to enter 90% of A/S reports on to the PNC within 24 hours, over a 12 month period Lincolnshire have made limited progress to achieving the ACPO target, and are now proportionately further away from the national average.
- 2.6.2 2.6.2 A similar trend is noted in the PI of court results. The percentage of court results entered onto the PNC within 7 days in August 2003 was 26.3%, although this figure has improved to 51.1% in July 2004, the Force is still below the English and Welsh national average of 53.6%. Whilst the Force is commended for this improvement it is too soon to determine whether this is a sustainable improvement and an indicator of an enhanced performance.
- 2.6.3 The number of Impending Prosecutions (IPs) has been reduced by 19% over the last 12 months from 3788 to 3,073. The Force has made reasonable progress in this area. It has been reported that the CJIU is currently in the process of checking all outstanding IPs more than 12 months old. Once this review has been completed the force will be in a position to undertake the process on a monthly basis. HMIC PNC Compliance Auditors are of the opinion that this monthly review of outstanding IPs may be carried out more efficiently at the CJUs with their closer links to the courts.
- 2.6.4 A graph illustrating these figures can be seen in Section 1 of this Report at paragraph 1.4.7.
- 2.6.5 The inputting of keywords has been disappointing at Lincolnshire Police. Over the last three months as the Force has experienced an overall reduction in the number of cases that have been keyworded. This process is carried out within the Phoenix section, where a cited lack of resources was given as the reason. The Force will need to employ measures to ensure that all outstanding offences are keyworded.
- 2.6.6 HMIC PNC Compliance Auditors were pleased to discover that the Force has a robust mechanism for ensuring that appropriate cases are referred to the Serious Crime Analysis Section (SCAS), a database maintained by a team of specialist staff at Bramshill. From interviews it was also apparent that senior officers within CID had an understanding of investigative abilities of PNC and would use those facilities as appropriate.
- 2.6.7 The recommendations outlined so far in this report aim to improve the quality of the data being input and to assist Lincolnshire Police 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 Lincolnshire Police:

Arrest Summons performance indicators are broken down on a divisional level and Lincolnshire's overall performance is compared against the national average.

Paragraph 2.1.4

The introduction of the auditing software in August 2004 to check the validity of wanted missing and vehicle reports every 90 days.

Paragraph 2.2.6.2

The PNC input to the police probationers at Stage 3.

Paragraph 2.3.2.3

Summary of Recommendations for Lincolnshire Police

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that the PNC Steering Group be revitalised with representation from relevant stakeholders within the Force, thereby enabling the Force to devise long term strategic objectives for its use of the PNC, and provide a forum to discuss and action any performance issues. In order to improve and subsequently maintain the profile of PNC, the Steering Group should be chaired by an ACPO rank

Paragraph 2.1.3

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that Lincolnshire Police 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.

Paragraph 2.2.2.2

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that a Force policy detailing the custody process including the completion of the P83 Source Input Document (SID) and the paper SID is published and enforced to ensure consistency of process. The policy must include the responsibilities of officers and police staff at all levels, including custody suites, arresting officers and the CJIU.

Paragraph 2.2.2.3

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 on information security, including the 1998 Data Protection Act and 1990 Computer Misuse Act.

Paragraph 2.2.5.3

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that the Force urgently review the situation within the Data Protection Unit to enable formal data protection audits to be conducted against the PNC data.

Paragraph 2.2.6.2

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that the Force adopts a structured approach to marketing, by way of a formal marketing or communication strategy, ensuring that awareness amongst operational staff is raised to an appropriate level.

Paragraph 2.3.1.4

Recommendation 7

Her Majesty's Inspector of Constabulary recommends that the Force introduce a PNC training strategy document that covers:

- (a) The training provision for new and existing employees including the criteria for acceptance on a course.
- (b) The provision of refresher training

Paragraph 2.3.2.5

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that the Force improves its liaison with the local Magistrates and Crown Courts. This should ensure that the Court personnel are aware of the expectations of the Police with regard to inputting of court results onto the PNC and improve the speed of the results being sent to the CJUs and the CJIU.

Paragraph 2.4.2

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that options be explored to improve the relationship with Non Police Prosecuting Agencies (NPPAs), to develop an awareness of their expected performance in this area.

Paragraph 2.4.3

Recommendation 10

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

- (a) Satisfies itself that PNC data transferred after the installation of the upgrade to the CIS system is accurate.
- (b) Guarantees that any future upgrades are thoroughly tested prior to their introduction.
- (c) Ensures that the quality assurance process includes checking the PNC record for the accuracy of the data.

Paragraph 2.5.2.2

Recommendation 11

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

- (a) Gives consideration to establishing policy and procedures in order to record police bail information on the PNC and thus benefit from the additional forensic data stored on the national database.
- (b) Continues to liaise with their Interface suppliers and PITO to have the necessary changes made to allow the automatic inputting of Police Bail.

Paragraph 2.5.4.2

Recommendation 12

Her Majesty's Inspector of Constabulary recommends that the Force gives consideration to reviewing the entire offence processing procedures in order that it is able to benefit from the installation of NSPIS Custody and Case Preparation applications and move closer to achieving the ACPO PNC performance indicators.

Paragraph 2.5.5.3

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 – 1st 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 – 2nd 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.