



WARWICKSHIRE POLICE

15 – 18 NOVEMBER 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 Warwickshire Police between 15th and 18th November 2004.

1.1.2 Warwickshire Police was subject to a PNC Compliance Audit using the April 2003 Protocols on PNC Compliance. Her Majesty's Inspector would like to acknowledge the enthusiasm of the Force and also to place on record his thanks to all members of staff who contributed to this report and provided assistance during the inspection.

1.1.3 This report is based on views and comments obtained from Strategic, PNC and customer level management and users at Force Headquarters and at both of the BCUs (referred to as 'Area'). These views have been supported by reality checks conducted by HMIC PNC Compliance Auditors.

1.2 Background

1.2.1 Warwickshire is a small county in the West Midlands, with a population of just over 500,000. Its economy is heavily influenced by manufacturing, complemented by a rapidly growing service sector. Businesses have benefited from a rapidly improving transport infrastructure with good rail links and easy access to the motorway network. The county's principal conurbation is Rugby (population 84,000); the county's visible minority ethnic groups are concentrated in the area of Warwick and Leamington, with Indian and African-Caribbean being the largest communities. Local government is administered through Warwickshire County Council and five district or borough councils.

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 service development respectively, and a Director of Finance. The Force strength comprises approximately 1,012 full-time equivalent police officers, 527 police staff, 170 special constables and 45 police community support officers (PCSOs),

1.2.3 The Force headquarters is located on the outskirts of the town of Kenilworth which forms part of the Southern Area. The Force has two Areas, the other being located in the north of the county. Each Area is commanded by a chief superintendent and is sub-divided into sectors that have coterminous boundaries with the local authority districts. The sectors have a clear remit to deliver an effective service to the communities they serve as well as contributing to the corporate goals of the Force.

- 1.2.4 Warwickshire Police has installed the NSPIS custody and case preparation applications throughout the force. When a person is taken into custody their details are entered into the NSPIS custody system. The custody sergeant is able to carry out a PNC names enquiry as part of the booking in process. They are able to link the returned PNC record to the custody record if they consider it appropriate. The PNC is only updated with partial details of the offender and the offence an hour after the custody record is completed. Also, at this time the NSPIS case preparation system is updated with the data from the custody system to enable the file preparation to commence.
- 1.2.5 NSPIS custody produces a paper source input document (SID). If the PNC record is linked to the custody record all the previous details on the offender will be printed on the form. These details need to be checked and amended if appropriate. For a new PNC record, a blank SID will be generated for completion by the officer.
- 1.2.6 The case handling units (CHUs), based at Leamington and Bedworth have responsibility for updating the PNC as a result of these arrest summons (A/S) reports created by the NSPIS custody application. Every morning the CHUs access the NSPIS custody system to print a list of the people who were processed through custody in the previous 24 hours. This list enables the CHU to ensure that they receive a paper SID for each one of the entries on the list. The CHU updates the PNC with the information contained on the SID.
- 1.2.7 The results from the magistrates courts are electronically transferred to the NSPIS case preparation application. Currently, Warwickshire are using a piece of software provided by Criminal Justice Information Technology (CJIT), which structures the results from the magistrates courts and enables the transfer to the PNC to take place more rapidly. Staff from the CHUs have to access the NSPIS case preparation system to facilitate the transfer of the data to the PNC.
- 1.2.8 The results from the crown court in Warwick are received in a paper format. The disposal data has to be entered into the case preparation system manually for transfer to the PNC.
- 1.2.9 The PNC Bureau (PNCB) located within Leamington police station has a complement of two and a half staff, with a supervisor and a manager and operates between the hours of 08.00 and 18.00, 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 enquires 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.
- 1.2.10 Both the PNCB and the CHUs are part of the Judicial Services department.

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 all 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** 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. 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. Bail Conditions – Entry of Police Bail within 24 hours.
- iii. 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.)

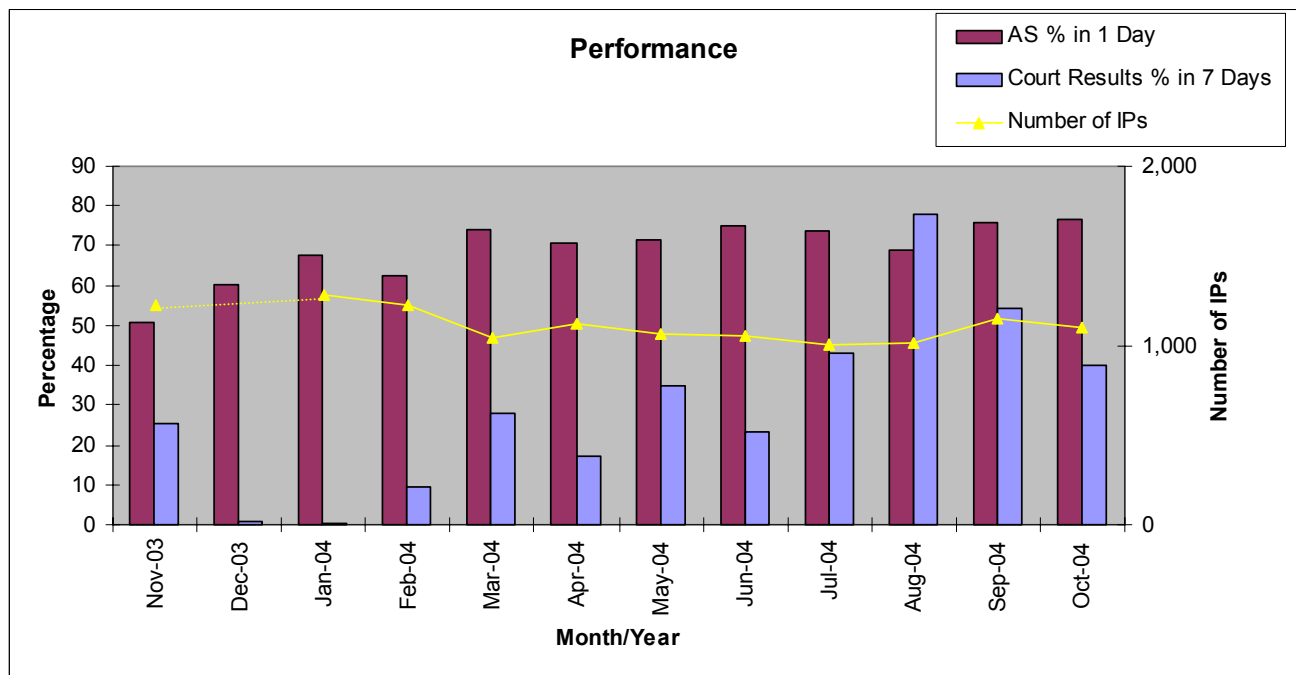
1.4.3 In October 2004 Warwickshire entered 76.5% of Arrest Summons (A/S) reports within the 24-hour target. Over the last 12 months the Force has shown a steady improvement in this PI, however, although the current figure for October 2004 is a high for Warwickshire it is still below the English national average of 81.7% and the ACPO target of 90% within 24 hours. The days the Force takes to enter the quickest number of A/S reports has also reduced over the same period and again Warwickshire have attained their best performance in October 2004 of 5 days. This is below the English average of 9 days. The Force have partially introduced the recording of DNA and fingerprints as a result of the change in the legislation and now takes DNA and fingerprints on arrest for those offenders brought in for more serious crimes. As a result of which Warwickshire has experienced an approximate 10% increase in the number of A/S reports it has to process on a monthly basis.

1.4.4 Warwickshire's performance in terms of court results, as displayed in the PITO statistics, has fluctuated over the last year. The percentage of court results entered within seven days in October 2004 was 39.9%, which is below the English average of 53.7%. However, the Force has achieved a high of 78% in August 2004 and disappointingly low figures of 0.7% and 0.5% in December 2003 and January 2004 respectively. It was reported to HMIC PNC Compliance Auditors that this variation in the court resulting performance was due to the unreliability of the interface between the NSPIS case preparation application and the CJIT software. In October it was reported that no disposals were downloaded from the magistrates courts for 11 days. The days to input 90% of cases have shown a steady improvement from 38 days in November 2003 to 19 days in October 2004. In this area the Force is now performing better than the English average of 39 days.

1.4.5 In terms of Impending Prosecutions (IPs), the overall outstanding number of IPs for Warwickshire Police has reduced from 1,173 in October 2003 to the current 1,098 showing a decrease of 6% 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. It was reported to the HMIC PNC Compliance Auditors that the PNCB had undertaken a 100% audit of the IPs within the last 12 months, and that this task was carried out twice a year. HMIC PNC Compliance Auditors are therefore assured that a process exists to manage the outstanding IPs.

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

1.4.6 A graph illustrating Warwickshire's performance in the 12 months to October 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:

- HMIC PNC Compliance Auditors' main cause for concern centres around the lack of robust auditing within Warwickshire Police. Even with the proposed changes that the Force has discussed with the HMIC PNC Compliance Auditors it is unlikely that the requirements of the ACPO Data Protection Manual will be achieved.
- The Force does not have an overall strategy document for the management of the PNC and is therefore unlikely to be able to progress issues and/or benefits on a long term basis to ensure that it is in a position to take advantage of the proposed changes

- HMIC PNC Compliance Auditors are concerned that Warwickshire is not prioritising the places on PNC courses so that staff who need access to the PNC as part of their job role are given the appropriate training.
- It is imperative that for the safety of the police officer and the offender that the warning signal information is updated onto the PNC within 24 hours. HMIC PNC Compliance Auditors remain to be assured that the process for inputting warning signals within Warwickshire is sufficiently robust to ensure that this always happens.
- 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, 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 Information Management Group and PNC User Group.

2.1.1.1 HMIC PNC Compliance Auditors were encouraged to find leadership, in relation to the PNC, to be an area of strength within the Force. The ACC has ownership of the PNC issues within his portfolio and there was evidence during interview of a good level of knowledge and understanding with regard to PNC issues. The Information Management Group (IMG) deals with the strategic issues concerning the PNC and is chaired by the same ACC. Within Warwickshire there is also a PNC User Group (PUG) which reports directly to the IMG.

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 considered the structure as good practice. However, they also discovered that awareness of the PUG in particular was low within BCUs, the feedback from the focus groups was that the area representation at the PNC User Group was not widely known about.

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that the Force raises the awareness of the PNC User Group amongst operational staff. Individual representatives must have responsibility to feedback to staff within their respective BCU to enable two way communication of issues between the PNC users and the group.

2.1.2 Performance Monitoring

2.1.2.1 It was encouraging to learn that the A/S Performance Indicators are broken down on an Area level and circulated to the Area Commanders. However, these statistics are presented in a format which does not facilitate the easy interpretation of trends or comparisons of performance between the two Areas.

2.1.2.2 All police forces are sent the nationally produced statistics on a monthly basis by PITO (Police Information Technology Organisation). Whilst it is recognised that in the past these statistics were not easily interpreted, they have recently been enhanced and are now provided in an easy to read chart format. HMIC PNC Compliance Auditors are aware of police forces who abstract the relevant detail

and display it in a format where comparisons can be made over a time period and with other police forces of a similar size.

- 2.1.2.2 This 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 Area 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 2

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

- (a) Distributes the PITO PNC statistics to the relevant stakeholders and include them with the locally prepared divisional PNC statistics displaying them in a format that will enable trends to be identified and comparisons made**
- (b) 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 Warwickshire Police.

- 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 3

Her Majesty's Inspector of Constabulary recommends that Warwickshire 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 PNC Policy and Procedures

2.2.3.1 Warwickshire does not have a comprehensive policy document in place which clearly outlines each individual's responsibility with regard to the PNC. Neither does it have a complete set of procedural guides outlining individual and departmental responsibilities for maintenance and update of the system within the Force. In particular, it was reported to HMIC PNC Compliance Auditors that there are no clear guidelines as to whether it is the arresting officer or the prisoner processing units who has the responsibility for completing the source input document (SID). Similarly, there are no documented procedures for the input of vehicle reports, which is undertaken by two departments within the Force. This often leads to confusion especially with new member of staff and may result in the omission of data updates as everyone is in the belief that it is someone else's responsibility.

2.2.3.2 In the absence of the appropriate publicised documentation the Force would be unable to pursue a policy of enforcement. The policies and procedures should outline who is responsible for each part of a process and the consequences of failure to comply. Such an approach would then enable the Force to hold officers and staff accountable in relation to the PNC data.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that the Force introduce a formal policy in connection with the PNC. It should ensure that it covers all aspects of PNC information and supporting documentation.

2.2.4 Security

2.2.4.1 Warwickshire Police has an Information Security Policy that is reviewed regularly. HMIC PNC Compliance Auditors were made aware of a computer based training

(CBT) package on Information Security that the Force had already purchased but was unable to take advantage of as a result of technical difficulties. The Force is encouraged to overcome these complications to gain the benefit of the investment it has already made in the CBT.

2.2.4.2 It was reported to the HMIC PNC Compliance Auditors that the “time-out” facility on the Force’s computer system which locks the users screen after a period of inactivity was set to 15 minutes. This is an additional risk to the misuse of the PNC which the Force has introduced by allowing the screen to be accessible whilst potentially unattended for such a length of time.

2.2.4.3 The final area of security that is worthy of comment is that of user access to the PNC. Responsibility for the management of user access to the PNC rests with the PNCB supervisor. Access to the PNC is only given once a candidate has successfully passed an assessment at the end of a PNC training course. The nature of the course, for example Names Enquiry or Vehicle Enquiry, and the job title of the candidate determine what level of access a user is given to the system. Upon completion of the training, the PNC Trainers notify the PNCB supervisor by email that the user needs to be set up on the system.

2.2.4.4 In terms of the removal of access, for example if a member of staff leaves the Force, the PNC supervisor has been provided with access to the Force’s HR system. The system administrator has set up a report to generate this information so that the PNC supervisor can easily identify officers and staff who have left or whose role has changed and amend the PNC access accordingly.

2.2.4.5 However, HMIC PNC Compliance Auditors learned that the Force has not independently audited the function being carried out by the PNCB supervisor. Whilst the integrity of the PNCB supervisor is not in question, this absence of independent monitoring exposes the Force to an increased risk of inappropriate or unauthorised access being granted to the PNC. Such an audit would ensure that the integrity of the system is maintained.

2.2.5 Data Protection Audits

2.2.5.1 Although the Force does produce an annual data protection audit plan it is not adhered to. It was also reported to the HMIC PNC Compliance Auditors that no data protection audits had taken place since September 2003. Prior to September 2003 the Data Protection Officer (DPO) had two assistants who were responsible for undertaking the audits. As a result of organisation changes these assistants had been reassigned leaving the DPO with sole responsibility for data protection, subject access, disclosure and the freedom of information legislation.

2.2.5.2 HMIC PNC Compliance Auditors were informed that the newly appointed PNCB supervisor was to undertake an auditing role within the Force. However, the PNCB supervisor has not been given any formal audit training. In order to carry out the role effectively HMIC PNC Compliance Auditors consider that training is essential.

2.2.5.3 In addition the PNCB supervisor performs enquiries and updates records on the PNC. Allowing an operational role to undertake the auditing process brings into

question the effectiveness of the auditing process due to the absence of independence.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that the Force prepares and adheres to a risk based audit plan in accordance with the ACPO Data Protection Manual. The PNC Code of Connectivity mandates the requirement for PNC Audits in accordance with Section 2 of the ACPO Manual for Data Protection Management.

2.2.6 Transaction Monitoring

2.2.6.1 Transaction monitoring is a function carried out by personnel based within the PNCB. 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 PNCB. 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..

Recommendation 6

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, they were not always fully conversant with the full capabilities of the system particularly when enhancements were made to the application.

2.3.1.2 The reality checks on the originator line² that the HMIC PNC Compliance Auditors carried out revealed that the driving licence database provided by the DVLA was

² 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

being used for intelligence gathering. Furthermore discussions within the focus groups showed that there was often confusion amongst operational officers as to when the information from the driving licence and the vehicle insurance database could be used. HMIC PNC Compliance Auditors were concerned with the lack of understanding of the implications of recent developments to PNC that provide operational benefits to officers, such as the legal requirements when accessing vehicle insurance data and driving licence information.

- 2.3.1.3 It was also reported during these meetings that a marketing tool had been lost to Warwickshire police officers and police staff when the paper form of Force Orders had been abandoned. The paper copy has been replaced by an electronic format on the intranet. As a result of the shortage of computer terminals and the way in which the information has now been disseminated across the intranet facility it was highlighted to the HMIC PNC Compliance Auditors that staff find it difficult to access the information that was previously contained within the Force Orders.
- 2.3.1.4 The force has employed the services of PITO and now plans regular presentations to promote the effective use of the PNC.
- 2.3.1.5 A draft marketing policy was provided as part of the pre-read material. HMIC PNC Compliance Auditors encourage the Force to adopt the policy as it would formalise the good practice in this area that it has begun.

Recommendation 7

Her Majesty's Inspector of Constabulary recommends that the Force most likely under the authority of the Information Management Group adopts the draft PNC Marketing Strategy and implements it throughout the Force to ensure that police officers and police staff are aware of the PNC facilities available to them.

- 2.3.2 Training
- 2.3.2.1 HMIC PNC Compliance Auditors were pleased to note that Warwickshire Police have five accredited PNC trainers (including the supervisor). The PNC courses are modular which enables the Force to employ a degree of flexibility in providing courses that suit the requirements of the job role.
- 2.3.2.2 However, it was reported that there is a waiting list of 40 to 60 people for the PNC enquiry course. Anecdotal evidence was provided that communication operators that were carrying out PNC checks over the radio have had to wait 8 months for a PNC names enquiry course. It was also reported to HMIC PNC Compliance Auditors that there are custody sergeants who have been given access to NSPIS custody (through which a PNC check can be performed), with no training on either NSPIS custody or on PNC.
- 2.3.2.3 Furthermore, Warwickshire 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.

- 2.3.2.4 With regards to the evaluation of training courses, the force uses feedback forms that are completed by students at the end of the course. There is no post training evaluation carried out. In order to obtain maximum benefit from evaluation, the force should consider introducing post training evaluation approximately three months after the delivery of a course. This will ensure that the course objectives have met the expectations of the student and that the benefits are being experienced back in the workplace.

Recommendation 8

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

- (a) Reviews its current prioritisation of places for PNC courses to ensure that those who require PNC in exercise of their daily duties receive training at the earliest opportunity**
- (b) Considers the provision of refresher training.**
- (c) Considers the introduction of post training evaluation to capture feedback from students once they have used their new skills back in the workplace.**

2.4 Partnerships and Resources

- 2.4.1 Warwickshire Police has developed a good relationship with the Magistrates Courts through the Joint Agency Executive Group meeting. The improvement in the provision of the court registers from the magistrates courts has been somewhat masked by the technical problems with the CJIT direct resulting solution linking the magistrates courts IT system and NSPIS Case Preparation application. Consequently, when the CJIT direct resulting solution is not working Warwickshire's NSPIS Case Preparation application does not electronically receive the court disposals from the magistrates courts IT system. Therefore, the PNC is not updated with the magistrates court results during that time period.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that the Force progresses with the Magistrates Courts and CJIT providers the current IT issues which are affecting performance.

2.4.2 Warwickshire have developed a secure e-mail system with the Probation Service so that they are notified of probation breaches in a timely manner. The Criminal Justice Information Technology (CJIT) initiative should enable this secure e-mail system to be extended to more NPPAs.

2.4.3 Another area that HMIC PNC Compliance Auditors reviewed under this protocol heading was the effectiveness of the Force when attending regional and national PNC meetings. HMIC PNC Compliance Auditors were pleased to note that the Force plays an active role in the regional PNC Liaison Officers Conference and the national P4G. The PNCB manager attends the groups on behalf of the Force and is therefore suitably placed to become aware of any national issues that may impact upon the force.

2.5 Processes

2.5.1 HMIC PNC Compliance Auditors found a number of areas worthy of comment in the management of PNC information. These can be broadly described under the following headings: quality of data; submission of source input documents; cases which do not pass through custody; update of police bail data and ad-hoc intelligence updates

2.5.2 Quality of Data

2.5.2.1 It was reported to the HMIC PNC Compliance Auditors that the CHU will check the data quality of the SID and the partial A/S records on the PNC and will update the PNC record from information on other systems at Warwickshire Police. 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 The reality checks that the HMIC PNC Compliance Auditors carried out on the SIDs did not reveal any major errors. The errors that were recorded appeared to be as a result of the updater being careless or could be as a result of inaccurate data being obtained when additional research is carried out by the member of staff as discussed in the previous paragraph.

2.5.2.3 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.

2.5.2.4 The process of authorising warning signals (W/S) onto the PNC names record is for the police officer to submit a PNC6 document to the PNCB who will then enter the information onto the PNC. The evidence for the W/S is generally captured on the SID or the NSPIS custody system, which the PNCB never see. The anecdotal evidence from the focus group discussions was that some W/S are undoubtedly missed off the PNC as the PNC6 is not submitted after the SID is completed.

Recommendation 10**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) Reviews the warning signal policy to ensure that the information is not missed off the PNC and that the bureaucracy for the officer is reduced.**

2.5.3 Cases Which do not Pass Through Custody

2.5.3.1 Currently, there is no process in place at Warwickshire Police to ensure that all records which should be input on the PNC are input in a timely manner. Processes only exist for those individuals who pass through the Custody Suites. However, there are cases which should result in the creation of a PNC record but where the individual concerned does not come into the Custody Suite, e.g. summons cases. In these cases the PNC record is created when the court disposal is received by the CHUs.

2.5.3.2 If the Force is to meet its ACPO target of 90% of Arrest/Summons records being created within 24 hours, processes are required to ensure that all cases are captured in a timely manner. It is therefore necessary for the Force to introduce processes to ensure that individuals who do not pass through Custody have their details recorded and input to the PNC within the 24 hours. HMIC PNC Compliance Auditors remind the Force of the Codes of Practice which are to be introduced from 1 January 2005 and which will enforce this requirement.

2.5.4 Update of Police Bail Data

2.5.4.1 Currently Warwickshire only updates arrest/summons records for cases where an offender has been released on police bail for serious offences and then only after the decision has been made to charge. It is therefore possible that officers 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 NSPIS custody 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) Introduce a process to capture details of all recordable offences for input to the PNC in a timely manner.**
- (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 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. HMIC PNC Compliance auditors remain to be reassured that the process for updating ad hoc intelligence data is robust.

Recommendation 12

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.

2.6 Results

- 2.6.1 Warwickshire's performance in respect of inputting A/S results has shown a steady improvement over the preceding 12 months, reaching a high for the year in October 2004 when the Force achieved 76.5% within 24 hours. However it must be noted that this is still well below the ACPO target of 90% within 24 hours, and the English average of 81.7%. The days the Force takes to enter the quickest number of A/S reports has also reduced over the same period and again Warwickshire have attained their best performance in October 2004 of 5 days. This is better than English average of 9 days. The Force have partially introduced the recording of DNA and fingerprints as a result of the change in the legislation and now takes DNA and fingerprints on arrest for those offenders brought in for more serious crimes. As a result of which Warwickshire have experienced an approximate 10% increase in the number of A/S reports it has to process on a monthly basis.

- 2.6.2 In terms of the numbers of A/S reports processed on a monthly basis, only the City of London input less data. Consequently, in purely mathematical terms there will not need to be many late submissions of A/S reports to badly affect the Warwickshire PI in this area. It is imperative therefore that the Force seriously considers Recommendation 12 concerning the capturing of data from cases that are not processed through the custody system, in order to improve their overall performance.
- 2.6.3 Warwickshire's performance in terms of court results, as displayed in the PITO statistics, has fluctuated over the last year. The percentage of court results entered within seven days in October 2004 is 39.9%, which is below the English average of 53.7%. However, the Force had achieved a high of 78% in August 2004 and disappointingly low figures of 0.7% and 0.5% in December 2003 and January 2004 respectively. It was reported to HMIC PNC Compliance Auditors that this variation in the court resulting performance statistics was due to the unreliability of the interface between the NSPIS case preparation application and the CJIT direct resulting software. In October it was reported that no disposals were downloaded from the magistrates courts for 11 days. (See recommendation 9 earlier in this report). The days to 90% have shown a steady decline from 38 days in November 2003 to 19 days in October 2004. In this area the Force is now performing better than the English average of 39 days.
- 2.6.4 In terms of Impending Prosecutions (IPs), the overall outstanding number of IPs for Warwickshire Police has reduced from 1,173 in October 2003 to the current 1,098 showing a decrease of 6% 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. It was reported to the HMIC PNC Compliance Auditors that the PNCB had undertaken a 100% audit of the IPs within the last 12 months, and that this task was carried out twice a year. HMIC PNC Compliance Auditors are therefore assured that a process exists to manage the outstanding IPs.
- 2.6.5 It was reported to the HMIC PNC Compliance Auditors that the Case Handling Unit manually inputs court bail for both the crown court on to the PNC, thus complying with national PNC Policy. Unfortunately, for bail administered by the magistrates court the Force has to wait for the electronic transfer between the courts IT system and NSPIS Case Preparation, consequently it is unlikely that the 24 hour target set by ACPO is achieved.
- 2.6.6 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 Warwickshire 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.

Appendix A

Summary of Good Practice within Warwickshire Police:

- The Force has an established management and meeting structure to ensure that PNC issues are dealt with at a strategic and practitioner level.
- The Force has implemented a secure mailbox with the Probation Service to ensure that changes required to PNC are made in a timely manner.

Summary of Recommendations for Warwickshire Police

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that the Force raises the awareness of the PNC User Group amongst operational staff. Individual representatives must have responsibility to feedback to staff within their respective BCU to enable two way communication of issues between the PNC users and the group.

Recommendation 2

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

- (a) Distributes the PITO PNC statistics to the relevant stakeholders and include them with the locally prepared divisional PNC statistics displaying them in a format that will enable trends to be identified and comparisons made.
- (b) Expand its current system of performance monitoring to include information on the quality of data submitted for input to the PNC.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends Warwickshire 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.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that the Force introduce a formal policy in connection with the PNC. It should ensure that it covers all aspects of PNC information and supporting documentation.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that the Force prepares and adheres to a risk based audit plan in accordance with the ACPO Data Protection Manual. 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 6

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 7

Her Majesty's Inspector of Constabulary recommends that the Force most likely under the authority of the Information Management Group adopts the draft PNC Marketing Strategy and implements it throughout the Force to ensure that police officers and police staff are aware of the PNC facilities available to them.

Recommendation 8

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

- (a) Reviews its current prioritisation of places for PNC courses to ensure that those who require PNC in exercise of their daily duties receive training at the earliest opportunity
- (b) Considers the provision of refresher training.
- (c) Considers the introduction of post training evaluation to capture feedback from students once they have used their new skills back in the workplace.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that the Force progresses with the Magistrates Courts and CJIT providers the current IT issues which are affecting performance.

Recommendation 10

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) Reviews the warning signal policy to ensure that the information is not missed off the PNC and that the bureaucracy for the officer is reduced.

Recommendation 11

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

- (a) Introduce a process to capture details of all recordable offences for input to the PNC in a timely manner.
- (b) Continues to liaise with their Interface suppliers and PITO to have the necessary changes made to allow the automatic inputting of Police Bail.

Recommendation 12

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.

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.