Use of the Police National Computer

An inspection of the ACRO Criminal Records Office

Contents

Summary

ACRO Criminal Records Office (ACRO) makes effective and efficient use of the Police National Computer (PNC). Staff are fully trained and all aspects of work that HMIC reviewed were of a high standard. The ACRO workforce is motivated and provides a vital and cost-efficient service to UK police forces.

ACRO provides a variety of vital PNC services to UK police forces. Its principal functions include the provision of police certificates, international child protection certificates and responses to subject access requests that require the collection of information from the PNC. These functions, and ACRO's portfolio structure, are explained in detail at annex A.

ACRO is compliant with most aspects of the PNC Code of Connection. All of the required certification is current. Use of the PNC by ACRO staff is comprehensively audited, but other databases that contain data downloaded from the PNC are not subject to the same standard of audit.

HMIC inspected ACRO's compliance with the PNC Code of Practice. ACRO was found to be compliant with those sections of the code which are still relevant. However, HMIC found the code to be seriously out of date. We recommend that the Home Office reviews the PNC Code of Practice to ensure it is current and relevant.

In HMIC's legitimacy inspection in spring 2016, we recommended that Hampshire Constabulary improves its ability to monitor force IT systems. As ACRO uses the Hampshire IT network, it is also deficient in this area. ACRO also needs to develop a comprehensive business continuity plan and test it regularly.

Hampshire Constabulary, the Hampshire police and crime commissioner, the National Police Chiefs' Council and the Home Office all have some involvement with ACRO. There was confusion among staff as to which body is responsible for ACRO.

The use of the PNC is a prerequisite for many aspects of ACRO's work. Where possible, ACRO has streamlined procedures and developed software to reduce bureaucracy. ACRO has developed a model of working which provides an excellent service to UK police forces.

Recommendation

The Home Office should, by 30 April 2018, ensure the PNC Code of Practice is current and relevant.

Areas for improvement

- ACRO should develop a system for auditing databases that contain downloaded PNC data.

- ACRO, working with Hampshire Constabulary, should ensure they are able to monitor IT systems.

- ACRO should develop an effective business continuity plan and test it regularly.

Background and context

The Police National Computer

The Police National Computer (PNC) is a national database of information available to all police forces throughout the United Kingdom.[1] In addition, certain other organisations, referred to as "non-police organisations", have access to information held on the PNC in order to help them fulfil their statutory functions.

Since its inception in 1974, the PNC has evolved and been enhanced to meet the changing needs of policing and the criminal justice system. In the early years of the PNC's operations, police forces did not put arrest or conviction data onto the PNC. This function was carried out from a facility in London, called the Criminal Records Office (CRO). The CRO also carried out other specialist functions using the PNC on behalf of all UK police forces.

In 1995, forces were given the facilities to put arrest and conviction data onto the PNC. The CRO continued to carry out its specialist functions until 2006.

ACRO and its evolution

In 2006, the Association of Chief Police Officers (ACPO) founded the ACPO Criminal Records Office, which became known as 'ACRO'. The intention was for ACRO to organise the management of criminal record information and improve the links between criminal records and biometric information. ACRO also inherited several of the CRO's specialist functions. At the outset, ACRO was a modest venture that employed a handful of personnel, working from temporary accommodation in a police station car park.

In the years that followed, ACRO expanded as it adopted extra functions on behalf of the police service, such as the exchange of criminal records information with law enforcement bodies in other countries.

In 2015, when ACPO was dissolved and replaced by the National Police Chiefs' Council (NPCC), ACRO's name was modified to become the ACRO Criminal Records Office, and the short name 'ACRO' was retained. All further references in this report to ACRO are references to the ACRO Criminal Records Office.

ACRO is operated by Hampshire Constabulary on behalf of the police service. All ACRO personnel are members of the force, and therefore under the direction and control of the chief constable of Hampshire Constabulary. ACRO adheres to

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[1] *Police National Computer (PNC) Guidance: version 5,* Home Office, January 2014, page 5. The PNC holds information concerning people and property, including convictions, wanted and missing people, stolen vehicles and other types of stolen property.

Hampshire Constabulary policies and procedures, relating to finance and personnel including professional standards. However, ACRO's operational focus is different and distinct from that of the force. ACRO's work is overseen by the ACRO governance board, which is independent of Hampshire Constabulary and ACRO. The governance board is led by the chair of the National Police Chiefs' Council.

ACRO is responsible for managing the UK Central Authority for the Exchange of Criminal Records (UKCA-ECR) with other EU Member States. This responsibility is delegated by the Home Secretary to the chief constable of Hampshire Constabulary, who in turn passes this to ACRO.

As of 31 December 2016, ACRO had 282 personnel (280 police staff members and two police officers, one of whom is a superintendent). Management of ACRO is the responsibility of its chief executive officer, assisted by the superintendent.

ACRO's principal functions are the provision of police certificates, international child protection certificates and responses to subject access requests that require the collection of information from the PNC. These functions, and the portfolio structure which ACRO adopts, are explained in detail at annex A.

Terms of reference

Her Majesty's Inspectorate of Constabulary (HMIC) is recognised as having strong expertise with regard to PNC use; and the Government's Independent Advisor on Criminality Information Management recommended that HMIC's audit role should cover all PNC users. Although ACRO is technically part of Hampshire Constabulary, it is not currently inspected as part of HMIC's force inspection regime.

In early 2016, the chief executive officer invited HMIC to inspect ACRO's use of the PNC. This is HMIC's report of that inspection. The inspection focused on the following three areas:

1. ACRO's compliance with the PNC Code of Connection;[2]

2. ACRO's compliance with the PNC Code of Practice;[3] and

3. the efficiency and effectiveness of ACRO's use of the PNC.

[2] *Home Office PNC Code of Connection Version 3.5, 2013, Part 1.3.* The Code of Connection defines the absolute minimum standards to be adopted and maintained by any organisation that wishes to connect to the PNC. It is based on standards and guidelines that are primarily concerned with the technical and security aspects of the PNC at a local organisational level.

[3] *National Centre for Policing Excellence (Centrex),The Police National Computer Code of Practice,* 1 January 2005, Part 25 & 26. The code is a statutory Code of Practice within the meaning of section 39A of the Police Act 1996, as introduced by section 2 of the Police Reform Act 2002. Its purpose is to set out achievable timeliness and data quality criteria entered onto the PNC and to promote good business practices to ensure the integrity of PNC data in the future.

This inspection did not consider any other areas of operations that ACRO undertakes. Specifically, our inspection did not include:

- contact with users of ACRO services such as police forces, other organisations and members of the public;

- examination of the electronic security of the IT systems and their resilience to cyber attack;

- detailed examination of the ownership and governance of ACRO;

- physical tests of the building security; or

- analysis of the content of training programmes for staff; or

- assessment of ACRO's compliance with the Police National Database Code of Practice.

Methodology

In mid-December 2016, we conducted an initial visit to ACRO's offices at Fareham, Hampshire to help define the scope of our inspection. The inspection team then conducted an extensive document review and analysis of relevant data in advance of our inspection. The inspection began on Monday 16 January 2017 and lasted for two weeks. During this time, inspectors visited ACRO and conducted:

- a series of interviews with managers and supervisors;

- focus groups with staff; and

- observations of ACRO's operations.

Findings

Compliance with the PNC Code of Connection

The PNC Code of Connection came into effect in 2013. Issued by the Home Office, it is a mandatory policy, adherence to which is required for an organisation's connection to the PNC.

The PNC Code of Connection defines the minimum standards to be adopted and maintained by any organisation that wishes to have access to the PNC. It is based on standards and guidelines that are primarily concerned with the technical and security aspects of the PNC at a local organisational level. In all aspects of the PNC Code of Connection that we were able to inspect, with the exceptions of business continuity and the audit of stored data, we found ACRO to be compliant.

Prior to connection to the PNC all users must have a current PNC Compliance Certificate. The Code of Connection details the process users must follow to obtain this accreditation. The certificates are valid for a period of one year and, at the time of our inspection, all of the required certification was current.

Security of the information stored on ACRO's computer systems is provided via the security measures in place for the Hampshire Constabulary computer network, on which ACRO operates. This has been reviewed by the national accreditor[4] and deemed fit for purpose. ACRO is planning to introduce its own dedicated computer network (as part of the Public Secure Network)[5] which is intended to provide resilience and faster connections to the PNC, but this has yet to be agreed by the force.

Staff were fully aware of the need to use passwords when accessing IT systems. In the weeks preceding our inspection they had been given 'reminder cards' stating the importance of not sharing passwords and of logging out of workstations when not in use.

The physical security of the building is good. There is electronic card operated access on doors and lifts, ensuring only accompanied or approved personnel have access to ACRO. The building security has been approved by the national accreditor.

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[4] The police national accreditor is a Home Office employee who is responsible for the accreditation of police IT systems to ensure the systems comply with policies and security requirements set out in the Community Security Policy as approved by the National Police Chiefs' Council.

[5] The Public Secure Network (Police) is a secure high-performance network to which the police and other public sector organisations have access.

All of the staff are vetted to the appropriate level by the Hampshire Constabulary vetting unit. On joining ACRO, all staff are given training in integrity and the standards expected of them. This was apparent during interviews and discussions with all the staff we spoke with during the inspection.

ACRO managers undertake comprehensive auditing of the use of the PNC by ACRO staff. They use software called PNC Guard.[6] This has been set to identify every 250th transaction carried out on the PNC through ACRO. The transactions so identified are then flagged to the audit team, which has access to all of ACRO's systems. This prompts the audit team to check the PNC record, view the reasons for the check, compare these with the originating documentation and see the result of the check. By doing this the audit team can determine whether the check was valid and necessary. If the team is unable to make such a determination, a message is sent to the operator asking the member of staff to explain the reasons for the check. These messages are then returned to the audit team for validation. If a check is deemed not to have been appropriate, there is an escalation procedure which could result in an investigation by Hampshire Constabulary's professional standards department. At the time of our inspection no instances of misuse of PNC data had been escalated through this process. The records of all completed audits are stored on secure databases.

Although its use of the PNC is subject to thorough and daily audits, ACRO stores PNC data on other databases which are not subject to the same audits. This is something for ACRO to address. In addition, forces must be able to monitor all of their information technology systems to identify individuals who misuse them for corrupt activity. This technology allows forces to monitor IT use by individuals in live time. We made Hampshire Constabulary aware that this area required improvement during our 2016 legitimacy inspection.[7] ACRO currently cannot monitor the use of all of its IT systems.

ACRO does not have a current business continuity plan. Should ACRO lose the ability to use its current building it will require access to another suitable building and the necessary PNC facilities to ensure business continuity. The senior managers within ACRO are aware of this and believe that, should it be necessary, they would be able to use PNC terminals at two other police buildings within Hampshire. However, ACRO has conducted limited tests which found that full functionality of all systems was not possible. ACRO needs to devise a business continuity plan which should then be fully and regularly tested.

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[6] PNC Guard is computer software which can randomly select PNC checks for audits or target, for audit purposes, specific PNC operators or data being checked.

[7] *PEEL: Police legitimacy 2016 – An inspection of Hampshire Constabulary*, HMIC, January 2017. Available from: www.justiceinspectorates.gov.uk/hmic/publications/peel-police-legitimacy-2016-hampshire/

> **Areas for improvement**
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> - ACRO should develop a system for auditing databases that contain downloaded PNC data.
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> - ACRO, working with Hampshire Constabulary, should ensure they are able to monitor IT systems.
>
> - ACRO should develop an effective business continuity plan and test it regularly.

Compliance with the PNC Code of Practice

The PNC Code of Practice ("the Code") took effect on 1 January 2005. It is a statutory code of practice within the meaning of section 39A of the Police Act 1996, as inserted by section 2 of the Police Reform Act 2002.

The purpose of the Code is to set out timeliness and quality criteria for data entered onto the PNC and to promote the adoption of good practices to ensure the integrity of PNC data. One of the provisions in the Code is that it should be reviewed one year from the date of its commencement. The Code remains in force, but it has not been reviewed or revised since its introduction. We found much of the Code to be out of date and no longer relevant, so we concentrated on the few aspects of the Code that remain relevant to ACRO and other PNC users. These aspects were:

- training;

- compliance with the Data Protection Act 1998 (DPA);

- the quality and timeliness of PNC inputs, both self generated and those from non-police organisations (referred to within ACRO as "non-police agencies"); and

- identifying best practice in PNC use.

HMIC recommends that the Home Office revise the PNC Code of Practice and bring it up to date.

We found that ACRO complies with all aspects of the Code that are still relevant.

ACRO staff were well trained in the requirements of the DPA. All new ACRO staff took part in a training course which included content from the DPA. Every member of staff, within the previous three months, had been given refresher training about the DPA and all of the staff we spoke to were aware of their responsibilities there under. Staff told us ACRO has a good relationship with the Information Commissioner's

Office and breaches of the DPA were reported as required. These included a few isolated occasions when police certificates had inadvertently been forwarded to the wrong address.

ACRO has a number of policies and guidance documents to assist staff in the completion of their work. These were comprehensive and staff were aware of them, knew how to access them and were seen using them during the inspection. Staff commented on how helpful they found these policies and guidance documents. We found these documents fully reflected the working practices required by the PNC User Manual.[8]

Due to the nature of the work that ACRO undertakes, virtually every member of staff uses the PNC. To ensure the most effective use of the PNC, all staff are given comprehensive training when they join ACRO. All of the training is provided by nationally-accredited trainers and the pass mark at the conclusion of the course has been set at 80 percent, rather than the 70 percent used nationally. ACRO has done this because it sees itself as a centre of excellence regarding the use of the PNC. New staff have all of their updates to the PNC monitored until they are considered fully competent. From that point on, ten percent of their updates are sampled.

ACRO monitors the amount of time staff occupy roles where use of the PNC is required. This is through a process known locally as 'movers and leavers', through which staff who have not recently[9] used the PNC are identified and retrained. Prior to these staff members accessing the PNC again, they are given a refresher course to ensure they are fully competent in the use of the PNC. All of the staff we observed during the inspection were comfortable and competent in their use of the PNC.

We were impressed with the GSA[10] system that assisted the quality control (QC) and audit processes. To ensure that updates to the PNC comply with the required standards, each of the teams within ACRO operates QC processes. These processes involve a colleague reviewing ten percent of the updates completed by each member of staff. The updates to be reviewed are selected randomly from a database which is updated by staff as they complete their work. Supervisors use the results from these update reviews as part of their staff's performance review process. Staff we spoke to had a range of views about the process of reviewing updates; from being completely comfortable to feeling awkward about finding fault in

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[8] *The PNC User Manual version 16.01*, Home Office, October 2016.

[9] The reasons for this often include matters such as sickness, maternity leave or attachments away from ACRO.

[10] The GSA (Geoff Smith Associates) system is bespoke software that streamlines certain ACRO processes, in particular the production of Police Certificates, by automatically transferring data from the PNC to ACRO's databases.

colleagues' work. To reassure itself that the QC process is fully accurate and effective, ACRO's audit team should conduct periodic checks on the error rate as reported by the teams.

ACRO interrogates and updates the PNC on behalf of 41 non-police organisations (NPOs). This involves conducting checks on individuals and inputting arrest information and court results. In order to update the PNC, the NPOs supply ACRO with a source input document (SID), which is quality-assured by the PNC services team. This team has developed good relationships with individual NPOs, and any substandard SIDs are addressed by the team. The team was effective at inputting NPO updates and managing the quality of SIDs.

Each of the processes within ACRO that involved updating the PNC was either subject to a service level agreement or an internally agreed timeliness target, which ACRO was achieving. The target in the PNC Code of Practice is to update the PNC within 24 hours of the start of a process, such as an arrest or summons. However, for NPO prosecution updates completed by ACRO, this target cannot be met because ACRO relies on the NPO forwarding the details before an update can be made. However, once ACRO receives such information, within 24 hours it updates the PNC. We reviewed a selection of updates and found them to be of a high standard. There were no backlogs of cases waiting to be updated on the PNC.

To identify good practice, and thereby ensure the integrity of PNC data, ACRO has a database working group. This group considers information from a range of sources:

- internal meetings in which issues regarding the PNC have arisen;

- learning identified through liaison officer[11] letters, by the internal audit team and case study reviews; and

- items from regional and national PNC meetings that ACRO staff attend.

ACRO is operated by Hampshire Constabulary and all ACRO staff are employees of the force. Although ultimately the staff are the responsibility of the chief constable, they are managed by the chief executive officer. Day to day management of staff is the responsibility of a Hampshire Constabulary superintendent. The assistant chief constable, with responsibility for Hampshire's access and use of the PNC, plays no role in the management or operation of ACRO.

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[11] Liaison officer letters are a long-established means of communicating any updates or changes to the PNC system, to police forces and other organisations that have access to the PNC. The letters are sent electronically.

ACRO's operational work is overseen by the ACRO governance board, which is independent of ACRO and is chaired by the chair of the National Police Chiefs' Council (NPCC). The office of the police and crime commissioner (OPCC) for Hampshire has a stake in ACRO's financial governance, as it has responsibility for the leases on the buildings that ACRO occupies.

ACRO is responsible for managing the UK Central Authority for the Exchange of Criminal Records (UKCA-ECR) with other EU Member States. This responsibility is designated by the Home Secretary to the chief constable of Hampshire Constabulary, who delegates it to ACRO. Much of ACRO's international work is carried out on behalf of the Home Office.

To protect Hampshire Constabulary against the costs of civil litigation and other unexpected liabilities, ACRO has significant funds in reserve as insurance. It is also in the process of indemnifying the force through section 22 of the Police Act 1996 which, once complete, would share any liability across all UK forces. ACRO reported that this is a time-consuming and lengthy process as all parties must sign an agreement.

We found these arrangements complicated. Staff at all levels within ACRO described them in a confusing variety of ways. Since its inception, ACRO has developed and taken on work that other organisations either could not do or were not willing to accept. This has led to the development of a unit that performs a variety of vital functions for a range of interested parties. In line with the terms of reference we did not inspect further these relationships. However, as many of the functions have no relevance to Hampshire Constabulary the ownership of ACRO and its roles and responsibilities should be reviewed.

Recommendation

The Home Office should, by 30 April 2018, ensure the PNC Code of Practice is current and relevant.

Efficiency and effectiveness

ACRO makes efficient and effective use of the PNC. Use of the PNC is a prerequisite for many aspects of ACRO's work. Where possible, ACRO has streamlined procedures and developed software that interfaces with the PNC to reduce bureaucracy. It has developed a model of working which provides an excellent service to UK police forces.

Communications within ACRO were good. Staff were kept informed and believed the levels of consultation to be good. A variety of methods were used to inform staff of new developments and give them the information needed to complete their work. These included email, an intranet site, regular staff meetings and bulletin boards. Staff commented that communication was made relatively easy as they were all on one site, and we were given examples of staff meetings that had been held when significant events occurred. This allowed everyone to attend and hear the messages. The intranet site was easy to use, informative and current.

ACRO has no marketing strategy. This means it may miss opportunities to respond to customer feedback and refine its working practices. Staff were unclear as to the relationships that ACRO had with interested parties such as Hampshire Constabulary, other police forces, the OPCC, the NPCC, the Home Office, NPOs and the public.

ACRO does not seek feedback about the services it provides to forces, NPOs and the public. ACRO has processes in place to allow for feedback, which led us to believe that if feedback was received it would be acted upon. However, this was a reactive process. Actively seeking feedback from its customers, which could be seen as a captive market, would reassure ACRO that it was in fact providing a high-class service and may also lead to some improvements. It does, however, have a communications strategy which details areas of work and responsibilities. ACRO does some excellent work and informs others of this through its annual report, regular updates to chief constables and through members of staff attending regional and national PNC groups.

At the time of our inspection there were 40 vacancies. This was due to ACRO staff applying for other posts within Hampshire Constabulary. This was cited as a continuing problem. A recent recruitment drive has resulted in 25 of those posts being filled, with new recruits due to start shortly. The current vacancies mean that, to operate effectively, staff have to be flexible in how they work. They are moved to similar roles in other teams to assist areas experiencing the highest demand. All of the staff we spoke to were supportive of such moves to assist colleagues. Staff were well briefed; everyone appeared to know exactly what was expected of them.

By deploying staff flexibly, ACRO demonstrated that it was good at managing demand. It was able to demonstrate how it responded effectively to unexpected significant pieces of work. For example, it was asked on short notice to check several thousand athletes and officials travelling to the 2016 Olympic and Paralympic Games in Brazil. ACRO has service level agreements with the NPOs on behalf of whom it interrogates or updates the PNC We found that it adhered to all of these agreements.

ACRO has good systems to monitor PNC use. National agreements for use of PNC require users to inform the PNC's Hendon data centre of increases in use more than ten percent. This is necessary to keep demands on the PNC within manageable limits, in order to ensure that the service is maintained at all times. ACRO complies with this requirement. Despite this, between July 2015 and August 2016, statistics revealed a drop of 13 percent in ACRO's PNC transactions, compared to the period July 2014 to August 2015. ACRO staff were unable to explain why this was the case.

ACRO is taking worthwhile steps to maximise efficiency. A recent business change programme has led to a £1m reduction in annual expenditure through changes to working practices. ACRO has automated its business process to link the GSA system with the PNC. This has removed the need for double-keying of information, which has greatly improved efficiency in the production of police certificates. ACRO has developed a method of accurately costing the services it provides, which is known as the 'unit cost model'. This has led to reductions in charges imposed for some services, due to recently introduced improved processes and the use of IT. ACRO has negotiated with other countries to exchange conviction data through the European Criminal Records Information System (ECRIS). By doing this, it is saving £200,000 annually on interpreters' fees. These changes have ensured that ACRO is responding to the budgetary pressures on forces, enabling it to pass on these efficiencies in the form of reduced costs for services.

Annex A – ACRO portfolio structure and principal functions

ACRO's operational work is split across three portfolios:

- International Services;

- National Services; and

- Business Development & Projects.

International Services

The International Services portfolio includes the International Criminal Conviction Exchange (ICCE) department.

The ICCE department is made up of two teams. The first is the UK Central Authority for Exchange of Criminal Records (UKCA-ECR) team, which manages the exchange of information between the UK and EU Member States via EU mechanisms. The second is the Non-EU Exchange of Criminal Records (NEU-ECR) team, which manages the exchange of information with countries outside the EU via Interpol channels.

National Services

The National Services portfolio is made up of four teams:

- National disclosures;

- PNC services;

- Customer services; and

- Criminal records.

The national disclosures team manages the majority of the services ACRO provides to members of the public. These services are:

- police certificates for people wanting move or work abroad. These are often required by foreign governments in order to make decisions on visa applications and entry into their countries.

- international child protection certificates (ICPCs) for people seeking to work with children outside the UK. These confirm whether or not the individual has a relevant criminal history. ACRO provides them on behalf of the National

Crime Agency's CEOP (Child Exploitation and Online Protection Centre) Command.

- National co-ordination of subject access requests from members of the public who want to access the information held on national police databases about them.

In addition, ACRO's criminal record team manages the records deletion process, which allows members of the public to request that information held about them on national police systems be removed. The authority to delete the PNC entries is given by individual chief constables.

The PNC services team deals with non-police organisations requiring information from the PNC and non-police prosecuting agencies requiring updates to be made to the PNC. Historical records (pre-1995) are held on microfiche and only updated to the PNC if and when the person subject to the record comes to the attention of the police again. The PNC services team completes the back-record conversion of these files on behalf of the police service.

Business Development & Projects

The Intelligence Unit analyses and assesses data to generate useful information and intelligence from ACRO's operational processes. The unit disseminates reports to police forces and other agencies.

The unit also has a team of ViSOR[12] staff who manage the records of UK nationals convicted of sexual offences abroad, as well as those of UK-based foreign nationals who are found to have previous convictions for sexual offences overseas. ViSOR staff use the Police National Database (PND)[13] to help identify individuals who have come to their attention.

The International Development team works with countries to develop information-sharing protocols, and develops processes with UK police forces for submitting information requests regarding overseas convictions. The team also works to raise the profile of ACRO's international criminal conviction exchange services.

The National Development team focuses on developing ACRO's products and services and the operational benefits they provide within the UK.

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[12] ViSOR is the database used by UK law enforcement agencies use to manage dangerous offenders. ViSOR stands for violent and sex offender register.

[13] The PND is a national data store of operational policing information and intelligence, through which forces can exchange information.

Central services

ACRO's operational services are supported by several central and corporate services across three portfolios:

- Business & Finance (Business & Facilities, Finance, Communications, Business Continuity & Risk Management);

- HR (ACRO HR team); and

- IT & Systems (ACRO IT, Systems Support & Compliance).

National units

ACRO provides support to the other national police units that are also operated by Hampshire Constabulary:

- National Police Freedom of Information and Data Protection Unit (NPFDPU);

- National Vehicle Crime Intelligence Service (NaVCIS); and

- National Wildlife Crime Unit (NWCU).