



AVON AND SOMERSET CONSTABULARY

6th – 10th March 2006

**POLICE NATIONAL COMPUTER
COMPLIANCE REPORT**

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1. Executive Summary

1.1 Introduction

- 1.1.1 Her Majesty's Inspectorate of Constabulary (HMIC) conducted a Police National Computer (PNC) Compliance Inspection of Avon and Somerset Constabulary between 6th and 10th March 2006.
- 1.1.2 The Constabulary was subject to a PNC Compliance Audit using the July 2005 Protocols on PNC Compliance. Her Majesty's Inspector would like to acknowledge the enthusiasm of the Force and also to place on record her thanks to all members of staff who contributed to this report and provided assistance during the inspection.
- 1.1.3 This report is based on views and comments obtained from strategic, PNC and customer level management and users at Force Headquarters and at 2 of the 6 Borough Command Units (referred to as 'Districts'). These views have been supported by reality checks conducted by HMIC PNC Compliance Auditors (hereafter referred to as HMIC Auditors).

1.2 Background

- 1.2.1 Avon and Somerset is a large force covering the former county of Avon and the county of Somerset, some 1,855 square miles with a population of about 1.5 million. It is faced with contrasting policing environments. This includes the diverse communities with several areas of deprivation in Bristol, the largest conurbation in the south-west. Whilst the county of Somerset presents the policing issues associated with a sparsely populated rural area containing many small and medium-sized, market towns.
- 1.2.2 The Force headquarters is located in Portishead about 10 miles outside Bristol. There are six basic command units (known locally as districts). 2004/05 saw the bringing together of the three districts in Bristol to form a single very large BCU which is coterminous with the unitary authority. The commanders of the six districts have a high degree of delegated authority to deliver policing services that meet the needs of their very different communities. The districts are supported by several operational headquarters departments, including specialist operations, criminal investigation, communications and criminal justice.
- 1.2.3 The command team comprises the Chief Constable (appointed in January 2005), the deputy chief constable, a director of finance and resources, a director of human resources and three assistant chief constables (ACCs). Avon and Somerset employs 3400 police officers, 2300 police staff, 380 special constables and 110 police community support officers.
- 1.2.4 The creation of Arrest/Summons (A/S) reports at Avon and Somerset varies depending on whether the NSPIS (National Strategy for Police Information Systems) Custody application is installed in the custody unit or not. At the eight custody units who have access to the custody system the creation of A/S reports is a semi- automatic process which

requires the custody officer to update the system with the details required to create a skeleton record on the PNC (the minimum amount of data required to create a new record). When the record is disposed from the custody application the PNC is updated with the details to create an arrest summons report. This is followed by the arresting officer completing a manual or NSPIS generated source input document (known locally as a 9A) which contains all the data required for a complete record on the PNC. This is posted to the Phoenix PNC Bureau (PPB) who will complete the record on the system. At the remaining custody units the arresting officer phones through the skeleton details to the PPB for the update of the PNC. The officer completes the 9a with the remaining information. The 9a is then sent in the internal mail to the PPB for them to update the PNC.

- 1.2.5 The magistrates' court results are electronically sent through to a central port in the PPB who is then able to print the registers. The PPB collect the Bristol crown court results twice a day. The Taunton crown court registers are faxed through to the PPB. The Constabulary and the crown courts have decided not to use the national Xhibit application as neither party believes it offers any business benefits
- 1.2.6 Disqualified Driver records, Wanted/Missing updates, updates to vehicle information reports, property (firearms and animals) reports and warrants cancellations on the PNC are the responsibility of the PPB. The Bureau also provides telephone checks for officers and performs enhanced searches on the system, such as transaction enquiries, Vehicles On Line Descriptive Searches (VODS) and Queries Using Extended Search Techniques (QUEST). The Bureau provides a 24/7 service to the Force.
- 1.2.7 The Crime Management Units update the remaining property reports, whilst the Vehicle Centre (to be incorporated into the force Service Centre from 1st April), have the responsibility for both of the report types dealing with stolen vehicles.

1.3 Methodology

- 1.3.1 A full inspection against the 2005 PNC Protocols was carried out, covering the sections of Leadership, Policy and Strategy, People, Partnerships and Resources, Processes and Results.
- 1.3.2 The inspection was conducted over three stages with a final assessment being provided in line with the current HMIC Baseline Assessment grading structure of:
- **Excellent** – Comprehensive evidence of effective activity against all protocol areas.
 - **Good** – Evidence of effective activity in many areas, but not comprehensive.
 - **Fair** – Evidence of effective activity covering some areas, but concerns in others.

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

1.3.3 The first stage of the inspection involved the force providing HMIC Auditors with documentation to support its adherence to the protocols. This was followed up by a visit to the Force with HMIC Auditors conducting numerous interviews with key staff. The visit to the Force also incorporated the final stage of the inspection, which was based upon reality checks. The reality checks included reviewing PNC data against source documents and a review of PNC policy documentation.

1.3.4 Using the evidence gathered during each stage of the inspection, this report has been produced based upon the European Foundation of Quality Management (EFQM) format.

1.4 **Current Performance**

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

- Accuracy
- Timeliness
- Completeness
- Relevancy

1.4.2 The strategy is owned by ACPO but is also reliant on other partners taking responsibility for key actions within the strategy. The partners include Centrex, HMIC, Police Information Technology Organisation (PITO) and individual forces.

1.4.3 On 1st January 2005, the performance indicators of the ACPO Compliance Strategy were replaced by the timeliness standards contained within the newly published Code of Practice for the PNC. The PNC Code of Practice, developed by the National Centre for Policing Excellence and endorsed by ACPO, is a statutory code made under s.39a of the Police Act 1996 (inserted by section 2 of the Police Reform Act 2002). It provides scope for the Home Secretary to invoke statutory intervention for forces failing to comply. With regards to individual forces, a number of performance indicators (PIs) specifically for PNC data standards were set. Each force has a responsibility to achieve the standards set within the Code of Practice. The timeliness standards within the Code are as follows:

- 90% of recordable offences entered onto PNC within 24 hours of the commencement of proceedings. The commencement of proceedings being defined as when a person is arrested, reported or summonsed.

- 50% of all finalisations being entered onto PNC within 7 days of the information being received by the police. This target increased to 75% on 1 July 2005, six months after the commencement of the Code. (Courts have their own target of 3 days for delivery of data to the police. Therefore, the police are measured against an overall target of 10 days.)

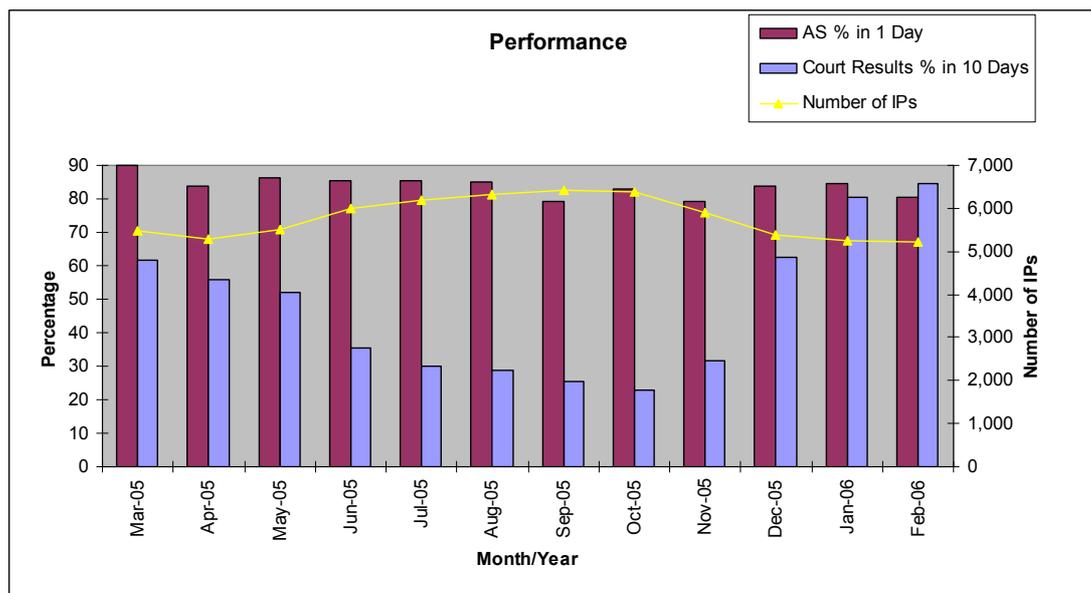
1.4.4 Avon and Somerset's performance against the ACPO PNC Code of Practice target for arrest summons input has been variable over the previous 12 months. It is noted that the force has achieved the target of 90% only once in the previous 12 months in March 2005. In February 2006 the Force input 80.5% of A/S reports within 24 hours, which is also below the national average of 84.9%.

1.4.5 The Force's performance in terms of court results has shown an improvement against the Code of Practice target over the last three months. The Force has achieved the target in January and February 2006 attaining 80.3% and 84.7% respectively. However prior to this the Constabulary failed to achieve the ACPO target in seven of the previous 12 months. Whilst HMIC Auditors are pleased that the Constabulary is now achieving the target it is too soon to be confident that this performance is fully embedded.

1.4.6 In terms of Impending Prosecutions (IPs) Avon and Somerset has shown a decrease of 3% in the 12 months to February 2006. Whilst this shows that the Force is effectively managing its outstanding cases on the PNC, comment should be made that the figure would have slightly increased if the Force was complying with the Code of Practice by updating all records at the point of arrest.

1.4.7 A graph illustrating Avon and Somerset's performance in the 12 months to February 2006 is shown below:¹

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



1.5 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, but concerns in others.

1.5.2 This assessment is based on the detailed findings of the report which highlight concerns in some areas of activity. In particular, Avon and Somerset needs to implement procedures which will ensure that it consistently achieves the PNC Code of Practice target in respect of the input of arrest summons within 24 hours. In addition, at the time of the inspection the Force was not complying with the Codes of Practice which state that 90% of recordable offences should be entered onto PNC within 24 hours of the commencement of proceedings. The commencement of proceedings being defined as when a person is arrested, reported or summonsed.

1.5.2 The findings of this report should read in conjunction with the previous reports and recommendations relating to the PNC. The previous reports are:

- Police Research Group Report – 'Phoenix Data Quality', *published 1998*
- HMIC Thematic Inspection Report – 'On The Record', *published 2000*
- HMIC Report – 'PNC Data Quality and Timeliness, 1st Report', *published 2001*
- HMIC Report – 'PNC Data Quality and Timeliness, 2nd Report', *published 2002*

- 1.5.5 A summary of good practice points, along with recommendations for improvement can be found at Appendices A and B of this report.

2. Detailed Findings and Recommendations

2.1 Leadership

2.1.1 PNC Steering Group

- 2.1.1.1 Avon and Somerset has a PNC Steering Group which meets on a monthly basis and is chaired by the Assistant Chief Constable. HMIC Auditors were informed that the Force plans to reduce the frequency of the meetings from monthly to quarterly once all targets are being met. HMIC Auditors were provided with documented terms of reference which clearly outlined the objectives of the group and identified the key stakeholders invited to attend. The review of the minutes highlighted the fact that whilst operational/district representatives are invited to the meetings, there is rarely any representative in attendance. This could lead to a breakdown in communications beyond the headquarters environment and may be, in part, responsible for some of the issues discussed later in this report.

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that the Force urges operational/district representation to attend the PNC Steering Group meeting on a regular basis.

2.1.2 Responsibility and Accountability

- 2.1.2.1 The PPB produce a management report each month for the Performance Improvement Meeting (PIM) which is chaired by the DCC. The pack includes a wealth of data on the Force's PNC performance. However, interviews revealed that senior managers find much of this information overly technical and as such confusing. Importantly as it is at a Force level it does not provide them with the data they need to improve performance at the district level.

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that the Force reviews the format of the monthly PNC management information presented to the PIM. In particular, district commanders should be consulted as to the data they need in order to improve performance.

- 2.1.2.2 The PPB check the NSPIS Custody 'log' in the morning and afternoon Monday to Friday to identify records which have been created on the system but have failed to successfully transmit to PNC records. The PPB can then create the record manually so that 24 hour target is attained. However, at the time of the inspection this was not being undertaken at the weekends. This clearly has a negative effect on the Force's A/S performance and on operational policing.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that the Force reviews its process for the prompt identification of cases which have failed to transmit from NSPIS Custody to PNC so that all PNC records are updated within the Code of Practice timescale.

2.2 Policy & Strategy**2.2.1 PNC Policy and Strategy**

- 2.2.1.1 In HMIC's Second Report on the PNC 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. Whilst it is recognised that Avon and Somerset have a PNC action plan this is not considered by the auditors to be a documented strategy.

- 2.2.1.2 A formalised strategy document covering topics such as the operational use of the PNC, training and security would provide a framework for continued improvement in the efficiency and effectiveness of PNC usage. It would also allow the Force to give 'ownership' of issues to individuals or departments and generate a more proactive approach to PNC. Importantly, it would help to ensure that the Force is getting a maximum return on its investment in the system and that officers gain most benefit from the information which is stored on it. The document should be viewed as a living document and be updated accordingly.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that the Force develops a PNC Strategy which expands upon the current PNC action plan to include future changes to the PNC to enable it to prepare a strategic position to forthcoming developments and to respond effectively at an operational level when these changes are introduced.

- 2.2.1.3 Avon and Somerset has a comprehensive set of policy documents with regard to PNC usage. It was reported that in addition to the current paper format these will be published on the Force intranet by summer 2006. HMIC Auditors encourage the Force to continue with this as it a

vital that officers and staff are aware of their personal and collective responsibilities in relation to the PNC.

2.2.1.4 Accepted good practice is where policies are dated and reviewed on an annual basis. On examining the Avon and Somerset PNC policies HMIC Auditors found a number of policies that were undated and the policy for the update of Crown Court Results had last been reviewed in April 2003. During the inspection HMIC Auditors were made aware that the PNC Manager was in the process of undertaking this review of the PNC policies. HMIC Auditors therefore encourage the Force to complete this task.

2.2.2 PNC Security

2.2.2.1 With regard to system security, HMIC Auditors reviewed five key areas. These are User Access, Transaction Monitoring, Data Protection Auditing, the Role of Professional Standards and Information Security, and Data Protection training. Some good practices and some areas of concern were identified during the review and these are discussed further below.

2.2.2.2 Access to the PNC is managed by the PPB supervisors. The Force has processes in place to ensure that a user is only given access to the system upon completion of a training course. There are also processes in place to ensure that all movers and leavers have their access to the system amended or removed, as appropriate. However, this process could be improved by ensuring that those officers and staff on long term sickness absence have their PNC access amended or revoked as necessary. In addition, whilst HMIC Auditors do not question the integrity of the work of the PPB supervisors, there is some risk to the organisation in having individuals able to make such changes to system access with no independent auditing of the activity being carried out.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that Avon and Somerset:

- **Introduces a process to ensure that officers and staff who are on long term sick leave have their access amended or removed from the system as appropriate;**
- **Introduces an independent audit, at least annually, of all user access administration.**

2.2.2.3 Transaction monitoring is a requirement of the ACPO Data Protection Audit Manual. It is a process where police officers and staff are asked to verify their reasons for performing transactions on the PNC and, as such, is an important activity in the prevention and detection of misuse or abuse of the PNC. At Avon and Somerset this is a function of the Corporate Information Management (CIM) Department who have Local Information Management Officers (LIMOs) in each district and corporate department. Each LIMO is responsible for conducting daily transaction checks for verification. The number of checks is dependent on the number of employees and whether the department operates on a 24

hour basis. A form is sent to the individual who requested the check to confirm that it was conducted for operational policing purposes and supporting documentation is requested. The form is signed off by the individual's supervisor before being returned.

- 2.2.2.4 The CIM department collate all the returns from the LIMOs and produce an annual report on the transaction monitoring within Avon and Somerset.
- 2.2.2.5 Whilst this process is viewed as good practice anecdotal evidence gained during interviews and focus groups revealed that some validation requests were received up to 4 weeks after the PNC transaction had taken place. This could involve the PNC enquirer in unnecessary additional research to justify the enquiry. The guidance issued by CIM states that the request should be sent out within a day of the PNC enquiry. HMIC Auditors encourage the Force to ensure that this guidance is adhered to.
- 2.2.2.6 Data Protection Audits are conducted by the CIM department. The CIM performs an annual risk assessment of its IT data systems following which decisions are made as to which systems are audited. An area for improvement would be to separate the PNC system into its various elements so that the Force can produce the more detailed risk assessment the audit manual specifies. Upon completion of an audit the recommendations are provided to the PNC Steering Group district commanders and departmental heads who have the responsibility for ensuring that all relevant actions are completed.
- 2.2.2.7 HMIC Auditors also reviewed the role of the Professional Standards Department (PSD) with regard to PNC issues at Avon and Somerset. The PSD is independent of operational activities and such independence is viewed as good practice. In addition, the CIM Department Manager has strong links with the PSD which ensures that the PSD is notified of any breaches of system security.
- 2.2.2.8 HMIC Auditors were informed that the Information Security Policy is reviewed annually and is supported by system operating procedures. Both of these are seen as good practice.

2.3 People

2.3.1 Marketing and Awareness

- 2.3.1.1 During meetings and focus groups, HMIC Auditors noted variable levels of awareness among officers and staff of the PNC functionality as an aid to operational policing. In particular, knowledge of the driving licence, insurance information, MOTs and ViSOR was very low. There was anecdotal evidence to suggest that officers were still submitting HORT/1s for road traffic offences in order to satisfy a performance regime for paperwork, as opposed to carrying out PNC checks over the radio. If this is the case and officers are creating unnecessary inconvenience for the public and bureaucracy for their colleagues to satisfy a statistical return it should be ceased immediately.

- 2.3.1.2 The Force relies heavily on its intranet for communication, thus placing a reliance on officers and staff to find information for themselves, a method which has its place, however, it can have weaknesses when providing information of operational importance. It is the view of HMIC Auditors that a focused marketing campaign should be carried out to raise the level of awareness of PNC functionality, covering a variety of communications methods across the Force. This campaign should be developed as part of a marketing strategy owned by the PNC Steering Group but using expert resources that may be available to it, for example, the force marketing department or the services of the PITO (Police Information Technology Organisation) PNC Customer Services team.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that the Force publishes and implements a Communication Strategy to raise awareness for the effective use of PNC across the Force.

2.3.2 PNC Training

- 2.3.2.1 It was reported that Avon and Somerset currently have three accredited PNC trainers and another three in the process of gaining their accreditation. All these trainers have responsibilities for training other IT systems as well as the PNC. The PNC courses are provided on a modular basis, by trainers who are assessed annually both of which are seen as good practice. In addition, there is a version control for lesson plans for PNC courses so that the Force can ascertain for any student the functionality that was being delivered at that point in time.
- 2.3.2.2 It was reported that PNC courses are planned three months in advance depending on the demand and are advertised on the intranet. Currently, applicants complete a 'Performance Needs Matrix' (PNM) which determines their training priority. It was reported that there are 60 to 70 staff on the waiting list for the PNC, the majority of whom have a lower priority as determined by the PNM. From 1st April the Force will be using the Training Administration System which is part of the NSPIS HR application to prioritise IT training. This will ensure that PNC training requests are determined as part of the appraisal system and therefore job related.
- 2.3.2.3 HMIC Auditors were informed that all PNC courses were subject to an assessment prior to staff being given access to the PNC. However, anecdotal evidence questioned whether this assessment covered all aspects of the update training. The guidance from Centrex is that all aspects of PNC training should be assessed and the Force needs to satisfy itself that it adheres to that national direction.
- 2.3.2.4 Good practices were identified in relation to PNC training which are worthy of note at this stage. It was pleasing that the Force had reassessed the PPB three years ago and that some Communication

Operators had been provided with an assessed refresher training course. HMIC Auditors would encourage the Force to continue with this course of action to cover all staff employed within the communications environment.

- 2.3.2.5 In addition, the Force has a policy to remove an operator's password if they have not accessed PNC for 3 months and to reassess operators who have not accessed PNC for 6 months.
- 2.3.2.6 Previous inspections have identified the procedure of reassessment of PNC operators as good practice. HMIC Auditors are aware of forces that have used the reassessment process to determine the need for refresher training. It was reported that there were a number of custody sergeants who had been given access to NSPIS custody without first being PNC names enquiry trained as recommended by Centrex. A comprehensive reassessment of all PNC operators, starting with staff who make PNC enquiries as part of their daily duties would enable the Force to resolve the issue of the custody sergeants and prioritise the refresher training.
- 2.3.2.7 The final point to be made in respect of PNC training is post training evaluation. The Force had some good practices in place with a "Happy Sheet" at the end of each course and training assessors attending courses on a regular basis to provide feedback to the trainers. In addition, the Force is also using the Kirkpatrick Evaluation Model which is an internationally recognised framework for monitoring the effectiveness of training courses. Unfortunately, there was no evidence from interviews and focus groups that this was being used to monitor PNC training courses.

Recommendation 7

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

- **Ensures that all aspects of PNC training is formally assessed prior to the operator being given access to the system.**
- **Implements mandatory reassessment for PNC operators with refresher training to be provided to any candidate who fails the reassessment and;**
- **Introduces a formal post training evaluation process, including a workplace evaluation after the trainee has had the opportunity to put the training into practice for all PNC courses.**

2.4 Partnerships and Resources

2.4.1 Relationship with the Courts

- 2.4.1.1 The Force has a good liaison with its local courts through the Local Criminal Justice Board and the Local Courts User Groups. As a result, no issues were raised during the inspection with regard to this area of

activity. Evidence of the effectiveness of this process can be seen in the Force's improved performance for updating court results on the PNC.

2.4.2 Relationship with Non Police Prosecuting Agencies (NPPAs)

2.4.2.1 With the introduction of the Code of Practice for PNC in January 2005, the target for the input of A/S records no longer includes those records which are updated as a result of an NPPA prosecution. However, there is still a need for forces to ensure that these records are updated in a timely manner to assist operational policing activity. This can only be achieved if forces encourage the NPPAs to provide complete, timely and accurate information for input to PNC. It was reported during the inspection that the Force does have Service Level Agreements with its NPPAs.

2.4.2.2 However, nationally provided PITO A/S statistics show that the over the last three months the Avon and Somerset NPPAs are not submitting their data within the 24 hour time limit. In previous inspections forces have sent letters to the NPPAs reminding them of their responsibility to submit this information in a timely manner which has been identified as good practice. HMIC Auditors encourage Avon and Somerset to undertake this process.

2.5 Processes

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

2.5.1.1 On 1st January 2005, the performance indicators of the ACPO Compliance Strategy were replaced by the timeliness standards contained within the newly published Code of Practice for the PNC. The PNC Code of Practice, developed by the National Centre for Policing Excellence (NCPE) and endorsed by ACPO, is a statutory code made under s.39a of the Police Act 1996 (inserted by section 2 of the Police Reform Act 2002). The Code stipulates that 90% of recordable offences be entered onto PNC within 24 hours of the commencement of proceedings. The commencement of proceedings is defined as when a person is arrested, reported or summonsed.

2.5.1.2 Avon and Somerset has only once achieved the Code of Practice target in the previous 12 months. In addition, HMIC Auditor reality checks showed that the Force was failing to update the full record promptly, therefore the record remains in skeleton form on the PNC during this time. Reality checks revealed that between January and February 2006 records were taking an average of 27 days to receive a full update which is an improvement on the period between October and November 2005 where records were taking an average of 53 days to receive a full update.

2.5.1.3 Finally, the Code states that the measurement for timeliness is from the 'commencement of proceedings' which in the case of an arrest is the time and date that a person is arrested.

- 2.5.1.4 At Avon and Somerset, the time and date of the decision (e.g. to charge/ bail/ release) by the custody officer is transmitted from NSPIS to PNC. However, new legislation means that there is a growing number of cases within the force where a custody extension is required to obtain more evidence before making a decision. In these cases, despite a potential three day delay in making a decision, the performance of the force would be unaffected because the time and date recorded on PNC would still be the decision time, giving the impression that the target had been met. Whilst it is recognised that NSPIS is a national system, forces using it should act as the drivers for change in order to ensure that they comply with new legislation.

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that the Force reviews its processes for the update of A/S records, in light of the inspection findings, to ensure that all PNC records are complete, accurate, timely, and that the force complies with the Code of Practice.

- 2.5.2 Non – custody cases

- 2.5.2.1 During the inspection HMIC Auditors reviewed the process for PNC updates for cases that do not pass through custody, e.g. individuals reported for summons or issued with a Fixed Penalty Notice for a recordable offence. Under the Code of Practice for PNC the system should be updated within 24 hours of the commencement of proceedings and, as such, these cases are included within the Code. At Avon and Somerset the officer in case should telephone the details through to the PPB to create a skeleton record onto the PNC within 24 hours. This should be followed by a form (referred to locally as a '9a') being completed by the officer to enable the full record to be updated.

- 2.5.2.2 Interviews and focus groups revealed that the majority of the officers were unaware of the process, particularly the requirement to telephone the PPB with skeleton details within 24 hours.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that Avon and Somerset Constabulary reinforces to operational officers its current processes for capturing non-custody cases on the PNC to assist in the achievement of performance targets.

- 2.5.3 Compliance with the Code of Practice

- 2.5.3.1 At the time of the inspection, Avon and Somerset Constabulary was failing to comply with the Code as not everyone arrested, reported or summonsed was being recorded on PNC. For example, cases that are subject to police bail are not recorded (other than on NSPIS Custody)

until a person is charged in all but one of the force Custody units. This is due to the fact that there are problems with the Force updating such data through the interface. In addition, if the decision in these cases is that 'No Further Action' is to be taken, the record will never be input to PNC. It is therefore possible that officers in other forces 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 is also losing 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.

- 2.5.3.2 HMIC Auditors were encouraged that the Force had plans in place to capture this data once the next version of NSPIS Custody becomes available.

Recommendation 10

Her Majesty's Inspector of Constabulary encourages the Force to implement its plans to record all arrestees within 24 hours of the commencement of proceedings onto the PNC, as soon as possible.

- 2.5.4 Ad hoc intelligence updates²

- 2.5.4.1 In Avon and Somerset the officers complete a form 78d with intelligence updates which are then assessed by the Local Intelligence Officer and passed through to the PPB for update to the PNC if appropriate. It was also reported that all major incidents undergo a debrief where intelligence data collected during the incident would be identified and passed into the intelligence system and subsequently the PNC.

- 2.5.4.2 However, if the Violent and Sex Offenders Register (ViSOR) system was updated with intelligence data there was no subsequent process to update the PNC. The Force is not therefore fulfilling its obligation to ensure that all PNC and ViSOR records are comparable with accurate and up to date information which is of particular concern as some of these records may relate to the most serious offenders.

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that the Force expands the process for capturing intelligence to guarantee that information applicable to PNC from ViSOR is identified and that a process is developed to ensure that the information is updated accordingly.

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

2.5.5 Data quality

2.5.5.1 HMIC Auditors conducted reality checks to determine the quality of data being supplied by officers and subsequently input to PNC. This was achieved by obtaining 29 source input documents (form 9a), reviewing their content and comparing the details submitted to the PNC record. HMIC Auditors were pleased to note that the Force updates all remand histories, adjournments and bail conditions on the system, which is accepted best practice.

2.5.5.2 However, some concerns were raised with regard to data quality. HMIC Auditors were informed that the PPB employ a quality assurance process where all new operators are 100% checked until the required standard is met. For more experienced staff their work is dip sampled. The results of this process are recorded and will form part of the appraisal process. However, reality checks revealed that 22% of records that had already been checked by supervisors still contained an error.

2.5.5.3 HMIC Auditors also identified a record that having passed through the supervisory process still contained an error of a magnitude which resulted in 2 records being corrupted with inaccurate information. Whilst the quality assurance process applies to the PPB operators it appears that the supervisors work is unchecked.

Recommendation 12

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

2.5.6 MO Keywords

2.5.6.1 MO keywords are a parameter that can be used during a QUEST search. This is an important intelligence feature of the PNC, which can be used to identify possible suspects, particularly for serious offences. It has been a requirement for several years that all forces must input MO keywords into the system to ensure that searches via QUEST cover the whole of PNC. It is vital to the success of PNC that the Force ensures the input of MO keywords for these serious cases.

2.5.6.2 It was report to the HMIC Auditors during the inspection that the Force has a backlog of approximately one year of cases waiting to be keyworded. This process is carried out within the PPB where a cited lack of resources was given as the reason. Therefore, HMIC Auditors encourage the Force to employ measures to address this backlog as soon as possible.

2.5.7 Warrants management

2.5.7.1 Warrants management is the responsibility of the Warrants Unit based in New Bridewell. The warrants officers are responsible for managing the physical warrants (i.e. the paperwork) and for notifying the Warrants Unit of any which require circulating on the PNC and for the cancellation

of existing warrants on the system. The PPB performs the out of hours cover for this process. Anecdotal evidence suggests that the process works well and is supported by quarterly audits undertaken by the CIM department.

2.5.7.2 However, reality checks on records revealed that 3 of the 6 examined had a date of birth indicating the record related to an individual of less than 5 years of age. Undoubtedly, the date used when the record was created was the date of creation rather than birth. There are two consequences of this incorrect date of birth. The first being that the record contains inaccurate information and secondly the record would not be returned if the correct date of birth was used to conduct the search. HMIC Auditors encourage the Force to extend the quality assurance process as discussed in recommendation 12 to all PNC updates.

2.5.8 Password resets

2.5.8.1 As with the majority of computer systems, users require a user identification and a password in order to gain access to the system. Management of this for the PNC is the responsibility of the PPB. As the system administrator the PPB has the ability and authority to reset passwords if a user has forgotten it and has subsequently locked themselves out of the system. HMIC Auditors were notified that no security questions which could be checked to personnel records (e.g. date of joining, date of birth) are requested prior to a password being reset. This exposes the Force to the risk of system abuse as an unauthorised individual could obtain access to the system if they were aware of an authorised user id.

Recommendation 13

Her Majesty's Inspector of Constabulary recommends that the Force introduces a process to ensure that the security of the system is maintained.

2.6 Results

2.6.1 In February 2006, Avon and Somerset input 80.5% of Arrest/ Summons (A/S) updates onto the PNC within 24 hours. It should be noted that the force has only once achieved the target of 90% in the 12 months to February 2006. However, for forces that create skeleton records on the PNC update of the full record in a timely manner is required in order to comply with principles 3 and 4 of the Data Protection Act. HMIC Auditors conducted reality checks and subsequent discussions, highlighted the fact that the Force has a backlog of updates to PNC of approximately a month. HMIC Auditors believe that the previous ACPO PNC Compliance Strategy target of 5 days is a guide which should be used to satisfy the legislation.

2.6.2 Avon and Somerset's performance in terms of court results has shown improvement against the Code of Practice target although the force

failed to attain the target in 7 out of the 12 previous months. HMIC Auditors were encouraged to see that the Force had achieved the target in January and February of 2006, but remains to be completely assured that the change in performance is fully embedded.

- 2.6.3 Finally, with regard to outstanding prosecutions on the PNC in the 12 months to February 2006 the Force has shown an overall decrease of 3%. In April 2001, HMIC supported by the Home Secretary stated that all forces should be in a position to confirm that any outstanding case that is over twelve months old is legitimately outstanding. In Avon and Somerset's case, this accounts for approximately 16.8% of all their outstanding prosecutions. HMIC Auditors are therefore assured that the Force is able to provide such confirmation.

APPENDIX A**SUMMARY OF RECOMMENDATIONS FOR AVON AND SOMERSET****Recommendation 1**

Her Majesty's Inspector of Constabulary recommends that the Force urges district representation to attend the PNC Steering Group meeting on a regular basis.

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that the Force reviews the format of the monthly PNC management information presented to the PIM. In particular, district commanders should be consulted as to the data they need in order to improve performance.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that the Force reviews its process for the prompt identification of cases which have failed to transmit from NSPIS Custody to PNC so that all PNC records are updated within the Code of Practice timescale.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that the Force develops a PNC Strategy which expands upon the current action plan to include future changes to the PNC to enable it to prepare a strategic position to forthcoming developments and to respond effectively at an operational level when these changes are introduced.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that Avon and Somerset::

- Introduces a process to ensure that officers and staff who are on long term sick leave have their access amended or removed from the system as appropriate;
- Introduces an independent audit, at least annually, of all user access administration.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that the Force publishes and implements a Communications Strategy to raise awareness for the effective use of PNC across the Force.

Recommendation 7

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

- Ensures that all aspects of PNC training is formally assessed prior to the operator being given access to the system;
- Implements mandatory re-assessment for PNC operators with refresher training to be provided to any candidate who fails the re-assessment and ;
- Introduces a formal post training evaluation process, including a workplace evaluation after the trainee has had the opportunity to put the training into practice for all PNC courses.

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that the Force reviews its processes for the update of A/S records, in light of the inspection findings, to ensure that all PNC records are complete, accurate, timely, and that the Force complies with the Code of Practice.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that Avon and Somerset Constabulary reinforces to operational officers its current processes for capturing non-custody cases onto the PNC to assist in the achievement of performance targets.

Recommendation 10

Her Majesty's Inspector of Constabulary encourages the Force to implement its plans to record all arrestees within 24 hours of the commencement of proceedings onto the PNC, as soon as possible.

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that the Force expands the process for capturing intelligence to guarantee that information applicable to PNC from ViSOR is identified and that the process is developed to ensure that the information is updated accordingly.

Recommendation 12

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

Recommendation 13

Her Majesty's Inspector of Constabulary recommends that the Force introduces a process to ensure that the security of the system is maintained.

APPENDIX B**SUMMARY OF GOOD PRACTICES AT AVON AND SOMERSET**

- The system of transaction monitoring, using district and departmental resources to supplement the corporate monitoring by CIM.
- The independence of the Professional Standards Department.
- The Information Security Policy which is reviewed annually and supported by system operating procedures.
- Removal of passwords of dormant PNC accounts after 3 months and reassessment of operators who have not access the system for 6 months.
- The version control on PNC lesson plans.
- Annual assessment of the PNC trainers.

APPENDIX C – ‘ON THE RECORD’**THEMATIC INSPECTION REPORT ON POLICE CRIME RECORDING, THE POLICE NATIONAL COMPUTER AND PHOENIX INTELLIGENCE SYSTEM DATA QUALITY - RECOMMENDATIONS****Recommendation 9** (Chapter 5 page 86)

Her Majesty's Inspector recommends that all Forces produce position statements in relation to the 1998 PRG report recommendations on Phoenix Data Quality and the ACPO Compliance Strategy for the Police National Computer. He further recommends that Forces produce a detailed action plan, with timescales, to implement their recommendations. The position statements and action plans together with progress updates should be available for audit and inspection during future HMIC PNC Compliance Audits and inspection of Forces. Forces should send copies of action plans to HMIC's PNC Compliance Audit Section by 1 February 2001.

Recommendation 10 (Chapter 6 page 104)

Her Majesty's Inspector recommends that Forces urgently review their existing SCAS referral mechanisms in the light of the above findings. These reviews should include verification with SCAS that all Force offences fitting the SCAS criteria have been fully notified to them, and updated. This process should be managed by Forces through their in-Force SCAS Liaison Officers.

Recommendation 11 (Chapter 7 page 111)

Her Majesty's Inspector recommends that the marketing, use and development of national police information systems is integrated into appropriate Force, local and departmental, strategic planning documents.

Recommendation 12 (Chapter 7 page 112)

Her Majesty's Inspector recommends that where not already in place, Forces should establish a strategic PNC Steering Group. This group should develop and be responsible for a strategic plan covering the development, use and marketing of PNC and Phoenix.

Recommendation 13 (Chapter 7 page 118)

Her Majesty's Inspector recommends that all Forces conduct an audit of their present in-Force PNC trainers to ensure they have received nationally accredited training. Any individuals who have not been accredited as PNC trainers by National Police Training should not conduct in-Force PNC training.

Recommendation 14 (Chapter 8 page 145)

Her Majesty's Inspector recommends that Forces ensure that each Phoenix inputting department develops an audit trail to register the return of substandard PSDs, via line supervisors, to originating officers. The system developed should include a mechanism to ensure the prompt return of PSDs. Forces should also incorporate locally based audit trails, monitoring the passage of returned PSDs between line supervisors and originating officers.

Recommendation 15 (Chapter 8 page 146)

Her Majesty's Inspector recommends that Forces develop clear guidelines to cover their expectations of officers on the return of incomplete or substandard PSDs. This guidance should be communicated to all staff and regular checks conducted to ensure compliance.

Recommendation 16 (Chapter 8 page 148)

Her Majesty's Inspector recommends that Forces should develop a system to ensure that all ad-hoc descriptive and intelligence updates registered on local Force systems are automatically entered onto the Phoenix system. The policy should clearly outline whose responsibility it is to notify Phoenix inputters of any descriptive changes. Forces should also ensure that the policy is marketed to staff and that regular checks are conducted to ensure compliance.

Recommendation 17 (Chapter 8 page 150)

Her Majesty's Inspector recommends that Forces develop a formal system to ensure that a proportion of each member of Phoenix inputting staff's work is regularly checked for accuracy. Forces should also consider the benefits of measuring other aspects of their work including speed of entry and compliance with policies. Performance outcomes should be evidenced in staff PDRs.

Recommendation 18 (Chapter 9 page 164)

Her Majesty's Inspector recommends, where not already present, that Forces develop risk assessed Force Data Protection Officer audit programmes.

Recommendation 19 (Chapter 9 page 164)

Her Majesty's Inspector recommends that Forces integrate PNC and Phoenix data quality compliance into their performance review and inspectorate programmes for BCUs and specialist departments.

Recommendation 20 (Chapter 9 page 165)

Her Majesty's Inspector recommends that PSD performance statistics should be incorporated in routine Force performance information. The statistics should identify omissions and errors in individual fields, in particular, descriptive information. Appropriate accountability measures should be established to ensure that any performance shortfalls identified are addressed.

APPENDIX D – PRG REPORT**“PHOENIX DATA QUALITY” RECOMMENDATIONS**

- National performance indicators and standards for timeliness of input, data fields to be completed, quality assurance requirements and the provision of training should be agreed by ACPO and promulgated to all Forces.
- Achievement against and compliance with these indicators should be audited after a period of 12 months, perhaps through the inclusion in the scope of HMIC audits.
- Senior officers take an active and visible role in policing compliance with agreed standards within their own Force.
 - ACPO performance indicators should be reflected in Force policy or standing orders (or the Force equivalent). Guidance should include the responsibilities of officers at each stage of the process e.g. for the provision of source documentation, for approval, time taken to pass to input bureaux, and the bureaux' responsibilities for data entry and quality control.
 - Line and divisional managers, as well as chief officers, should be held accountable for compliance with these standards. This could be achieved through inclusion in divisional efficiency assessments, and through the publication and dissemination of performance statistics throughout individual Forces and nationally.
- Source documentation should be common across all Forces, if not in design, in the information requested. A national format, stipulating a hierarchy of fields to be populated, should be developed.
- Programme(s) geared to raising awareness amongst operational officers and line managers of the potential benefits of Phoenix in a practical sense and their responsibilities of the provision of data should be developed. To ensure all officers have an opportunity to benefit from these programmes, consideration should be given to inclusion of a 'Phoenix awareness' module in probationer training, promotion courses and divisional training days.
- Best practice in administrative arrangements and organisational structures should be widely distributed. Internal working practices and organisational structures should be streamlined to remove any redundancies.

- Greater computerisation of the transfer of results from courts direct to Phoenix should continue to be developed. In the shorter term, the Police Service is likely to retain responsibility of the input of court information. To minimise the resource burden on the Police Service in this interim period, the police and courts should work to ensure recognition of each other's requirements and to minimise any inconsistencies in their respective working practices.
 - In the first instance, this might be achieved by ACPO highlighting to Magistrates' Courts and to the Crown Court, perhaps through the Trials Issue Group, the importance of Phoenix records to the integrity of the criminal justice system as a whole. Liaison meetings could usefully be established to introduce greater consistency in working and recording practices between the courts and police Forces e.g. for recording data. In the first instance, this could be pursued locally, perhaps through the court user group. Issues considered by such meetings might include supplying additional information (such as Arrest / Summons numbers) to the Magistrates' Court system and to automated transfer of court registers.
 - Consistent practice and performance is also required from the courts. Recommendations referring to performance indicators and standards, audits and monitoring, senior level commitment, common recording practices, awareness of system customers and administrative 'best practice' could equally apply to the courts. Mirroring the responsibilities of Chief Constables for their Force, the Court Service and the Magistrates' Court Committee should be accountable for the performance of courts.
 - Consistent practice in advising custody details, including transfers and releases, is required. This includes consistency in advising CRO numbers to maximise the number of complete records. The police and prison services should liaise to encourage greater understanding and acknowledgement of each other's requirements.

APPENDIX E – 1ST PNC REPORT**POLICE NATIONAL COMPUTER DATA QUALITY AND TIMELINESS –
RECOMMENDATIONS****Recommendation One (Paragraph 5.2)**

Her Majesty's Chief Inspector recommends that ACPO nationally review the position and priority of PNC within the structure of portfolio holders to reflect both the technical and operational importance of PNC.

Recommendation Two (Paragraph 5.11)

Her Majesty's Chief Inspector draws renewed attention to Recommendations 11 to 20 of *'On the Record' (2000)*, and recommends that all forces develop appropriate systems, overseen at a senior level, to ensure that they are implemented.

Recommendation Three (Paragraph 5.19)

Her Majesty's Chief Inspector recommends that PITO review, as a matter of urgency, the supplier/customer relationship between PNC and forces, particularly in relation to the marketing of PNC functionality, and the type, frequency and validity of management information reports produced.

Recommendation Four (Paragraph 5.29)

Her Majesty's Chief Inspector recommends that Her Majesty's Inspector (Training), in consultation with PITO and National Police Training, conducts a review of the quality and availability of accreditation training for PNC trainers and the extent to which they are subsequently employed in forces.

Recommendation Five (Paragraph 5.31)

Her Majesty's Chief Inspector recommends that discussions take place between ACPO, PITO and other relevant stakeholders to examine what opportunities exist for a short term 'technology solution' for the inputting of Court Results, either involving NSPIS applications currently in development, or an interim solution.

Recommendation Six (Paragraph 5.34)

Her Majesty's Chief Inspector recommends that renewed and re-invigorated discussions should take place between relevant stakeholders to, (a) Ensure that local systems are in place to maximise co-operation with the courts to achieve their respective 72 hours targets and, (b) Work towards Magistrates' Courts and Crown Courts assuming full responsibility for inputting all case results directly onto PNC.

Recommendation Seven (Paragraph 6.10)

Her Majesty's Chief Inspector recommends that following appropriate consultation with relevant stakeholders, a national inspection protocol for PNC data quality and timeliness be introduced.

Recommendation Eight (Paragraph 6.12)

Her Majesty's Chief Inspector recommends, that following appropriate consultation with relevant stakeholders, the Secretary of State should consider using his powers under Section 5 of the Local Government Act 1999, to require all police authorities to institute a Best Value Review of processes to ensure PNC data quality and timeliness. Such review should be conducted against a common template and terms of reference.

Recommendation Nine (Paragraph 6.14)

Her Majesty's Chief Inspector recommends, that in consultation with the Standards Unit and other stakeholders, HM Inspectorate should urgently review their current PNC audit responsibilities in the light of the findings of this report, with a view to adopting a more proactive stance in relation to force performance, data quality and timeliness.

Recommendation Ten (Paragraph 6.16)

Her Majesty's Chief Inspector recommends, that in consultation with other stakeholders, ACPO IM Committee initiate research with a view to encouraging mutual support between forces for out of hours PNC data entry purposes.

APPENDIX F – 2ND PNC REPORT**POLICE NATIONAL COMPUTER DATA QUALITY AND TIMELINESS –
RECOMMENDATIONS****Recommendation 1**

The Home Office should lead and co-ordinate an urgent re-examination of the current PNC strategy and standards with a view to producing national binding performance and compliance criteria to which all relevant stakeholders and partners are agreed and committed.

Recommendation 2

ACPO nationally and Chief Constables locally must ensure that the national standards for PNC operation, resourcing and training are fully integrated into local Information Management Strategies and recognised as an important part of operational service delivery. This area must receive sustained high-level support through a 'champion' at chief officer level.

Recommendation 3

PITO should be tasked to consolidate the force 'profiling' approach as used in the inspection into the routine statistical returns provided to forces. PNC statistics should then be integrated into the mainstream suite of management information/indicators that inform decisions at force and BCU levels.

Recommendation 4

HMIC should be tasked to establish a risk-assessed programme of monitoring and inspection that is able to respond quickly and effectively to deviations from accepted standards. This programme should include;

- remote monitoring of performance (PITO profile statistics)
- regular collaboration and contact with force PNC Managers
- proportionate programme of visits and inspections
- targeted interventions to respond to identified problems

Recommendation 5

The Home Office should establish a structured process for addressing and remedying any significant and persisting deviation from the agreed national standards (see Recommendation 1). This process should identify the respective roles of HMIC, Police Standards Unit and police authorities. It should set out the escalation of responses, which might include an agreed action plan, re-inspection, Intervention, and ultimately withdrawal of facility.