



GREATER MANCHESTER POLICE

20 – 23 JUNE 2005

POLICE NATIONAL COMPUTER

COMPLIANCE REPORT

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1. Executive Summary

1.1 Introduction

- 1.1.1 Her Majesty's Inspector of Constabulary (HMIC) conducted a Police National Computer (PNC) Compliance Inspection of Greater Manchester Police between 20th and 23rd June 2005.
- 1.1.2 Greater Manchester Police was subject to a PNC Compliance Audit using the April 2003 Protocols on PNC compliance. Her Majesty's Inspector would like to acknowledge the enthusiasm of the Force for its services and also to place on record his thanks to all members of staff who contributed to this report and provided assistance during the inspection. Particular note is made of the comprehensive documentation that was provided to auditors in advance of the inspection.
- 1.1.3 This report is based on views and comments obtained from Strategic, PNC and customer level management and users at Force Headquarters and at two of twelve Basic Command Units (BCUs). These views have been supported by reality checks conducted by HMIC PNC Compliance Auditors.

1.2 Background

- 1.2.1 Greater Manchester Police is the third largest force in England and Wales responsible for policing the metropolitan areas of Manchester, Salford, Trafford, Wigan, Bolton, Bury, Rochdale, Oldham, Tameside and Stockport. In addition, the force is responsible for policing services at Manchester International Airport, the busiest airport in the United Kingdom outside of London. The force covers an area of approximately 500 square miles but has a resident population of 2.5 million people, therefore, policing challenges are presented in some densely populated areas. The force is predominantly urban but with borders to Lancashire, West Yorkshire and Derbyshire, there is also a requirement to police some rural communities. The force is home to a number of Premiership and Championship football clubs and is also home to a large student population. The City of Manchester has also been regenerated over recent years increasing the number of visitors to the area, all contributing to the diverse nature of policing for the force.
- 1.2.2 Twelve BCUs currently provide policing services within Greater Manchester Police. The current BCUs are North Manchester, South Manchester, Salford, Tameside, Stockport, Bolton, Wigan, Trafford, Bury, Rochdale, Oldham and Metropolitan. In addition to the local and community policing, the force is also responsible for policing over 281 miles of motorway.

- 1.2.3 The Force is headed by the Chief Constable's Command Team, led by the Chief Constable, supported by the Deputy Chief Constable (DCC), five Assistant Chief Constables (ACCs) and an Assistant Chief Officer (ACO), with individual responsibilities for Operational Support, Personnel & Training, Community & Internal Affairs, Crime Operations, Territorial Police and Finance, Business Services, Estates & Administration. The Force strength comprises approximately 8,000 full-time equivalent police officers, 392 special constables and 4,000 police staff, including Police Community Support Officers.
- 1.2.4 The PNC function falls within the portfolio of the ACC Operational Support who has overall responsibility for the function. However, day to day management of the function is devolved to a Superintendent as Head of Criminal Justice Administration, the manager of the Criminal Records Unit (CRU) and the manager of the System Management Unit (SMU) who carries out the role of PNC Liaison Officer. The CRU manager is responsible for the staff who update Arrest/Summons information, court results, M.O Keywording and vetting & disclosure. The manager of SMU is responsible for system administration and also a team of staff who act as a central point of reference for the PNC.
- 1.2.5 The CRU, based at the force headquarters, is divided into five sections each covering a variety of shifts, however, one of the sections maintains a 24 hour/7 day presence within the unit. The five sections are Vetting & Disclosure who work from 07:00 to 14:30 Monday to Friday, Results, Antecedents and Data Quality & Training, each of which operates an alternating shift pattern covering the hours between 07:00 and 23:00 Monday to Friday with some staff also working day shifts. Finally there is the Data Input Section which operates both an alternating shift pattern between 07:00 and 23:00 Monday to Friday and also a 24 hour shift system.
- 1.2.6 The CRU is responsible for all updating of the names application throughout the force, including arrest/summons, court results, bail conditions, MO keywords, wanted/missing, disqualified driver updates and quality control. An arrest/summons record is created on the PNC following electronic transmission of the record from the force custody system with the data input section having responsibility for ensuring that all transmissions are accurate and that the records are fully populated. Following the transmission via the interface, a hard copy of the source document is sent to the data input section as reference for staff when carrying out their duties.
- 1.2.7 Court results are sent into CRU from all of the courts via secure e-mail. Staff record the timeliness of receipt and input all data from the court sheets direct to PNC. Crown court results are received manually to the antecedents offices that are located in each of the crown court buildings before being sent by courier to the CRU for update to PNC. In the six months leading up to the inspection, GMP created an average of 9,000 records per month and resulted an average of 9,000 cases on the PNC.

1.2.8 VODS (Vehicle On-line Descriptive Searches) searches are provided by the SMU as a central point of contact but also by Operational Communications staff and local intelligence analysts. QUEST (Queries Using Enhanced Search Techniques) searches are carried out by staff in CRU, ensuring a 24hour service is available. A list of trained users is placed on the force intranet for reference to ensure that officers can always get searches carried out.

1.3 Methodology

1.3.1 A full inspection was carried out covering the sections of; Leadership; Policy & Strategy; People; Partnerships & Resources; Processes and Results.

1.3.2 The inspection was conducted over three stages with a final assessment being provided in line with the current HMIC Baseline Assessment grading structure of;

- **Excellent** - Comprehensive evidence of effective activity against all protocol areas.
- **Good** – Evidence of effective activity covering 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 all the protocol areas, or serious concerns in one or more areas of activity.

1.3.3 The first stage of the inspection involved the force providing HMIC PNC Compliance Auditors with documentation to support their adherence to the protocols. This was followed by a visit to the force with HMIC PNC Compliance Auditors conducting interviews with key staff. The visit to the force also incorporated the final stage of the inspection that was based upon reality checks. The reality checks focused on reviewing PNC arrest/summons data against source 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 accepted the ACPO PNC Compliance Strategy. The strategy is based upon the following four aspects of data handling;

- Accuracy
- Timeliness
- Completeness
- Relevancy

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

1.4.3 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 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 1896 (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;

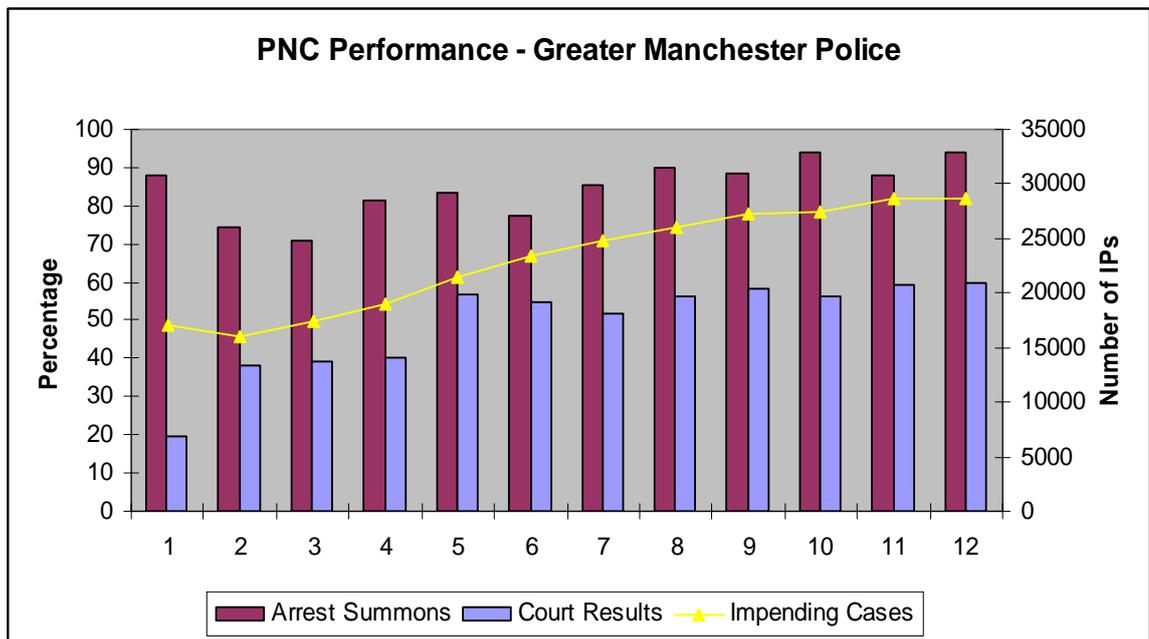
- 90% of recordable offences entered onto PNC within 24 hours of the commencement of proceedings. The commencement of proceedings being defined as when a person is arrested, reported or summonsed.
- 50% of all finalisations being entered onto PNC within 7 days of the information being received by the police. This target was increased to 75% on 1st July 2005, six months after the commencement of the code. (Courts have their own target of 3 days for delivery of the data to the police. Therefore, the police are currently measured against an overall target of 10 days).

1.4.4 Greater Manchester Police create arrest/summons records on PNC via an electronic transfer of data from the force's custody system. A full record is created via the interface, which is followed up by a hard copy of a source input document being sent to CRU to ensure that records are complete. In the 12 months to June 2005, the force has steadily improved its performance as new processes surrounding the introduction of the interface were embedded. In July 2004 the force achieved 88.1% with 24 hours rising to a high of 94% in June 2005. During this period, performance dropped to 71.1% in September but the force has improved since and is now consistently achieving good results. In terms of the number of days to enter the quickest 90% of records, the trend has been similar with the force showing improved performance from 13 days in September 2004 to 1 day in June 2005. The force is performing higher than the England and Wales national averages for this aspect of PNC Performance.

1.4.5 Performance with regard to the input of Court Results has also improved over the last 12 months. Between July 2004 and June 2005, the force saw significant improvement from 19.8% of results being entered within 10 days to 59.6%. However, using the forces own statistical data that takes into account the delays incurred by the courts, the force was achieving an average of 90.75% of results being entered within 7 days of receipt. With regard to the number of days taken to enter the quickest 50% of disposals, using the PITO statistics that are produced on a monthly basis, the force has also improved from a position of taking 39 days in August 2004 to just 8 days in June 2005.

1.4.6 In terms of Impending Prosecutions (IPs), GMP's overall outstanding number of IPs has increased from 17,053 to 28,636, a rise of approximately 68%. However, there is a direct correlation between the increase in the number of IPs and the implementation of the Criminal Justice Act. HMIC PNC Compliance Auditors learned that a continual process is in place to ensure that old cases are reviewed on a regular basis to provide assurance to the force that all cases are legitimately outstanding

1.4.7 A graph illustrating Greater Manchester Police's performance in the 12 months to June 2005 is shown below.



Performance against PNC Targets over twelve month period to June 2005

1.5 Conclusions

1.5.1 HMIC's assessment of PNC compliance within the Force has been assessed as:

Good - Evidence of effective activity covering many areas, but not comprehensive.

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

- The force has strong leadership and strategic direction from Chief Officer level and the PNC Steering Group. The force also hold all relevant staff accountable regarding the submission of source input documentation.
- The force has also developed a wide range of policies and procedures that clearly outline the various areas of responsibility and are known to all staff.
- Management of user access is robust with processes in place to manage new users, staff who leave the force and staff who have changed roles within the organisation.
- Levels of awareness amongst staff are good with the PNC also forming an integral part of Investigative Strategies.
- The force has developed good relationships with both internally and externally to assist in the achievement of targets. The requirements for the force in relation to PNC have been raised at LCJB level and there are also informal relationships between CRU staff and the courts' staff.
- Further work is required concerning the quality of information being updated on PNC. Despite the existence of the Data Quality section, error rates were considered to be high, albeit only minor errors were found.
- HMIC PNC Compliance Auditors found inefficiencies on the use of Operational Communications Staff for PNC updating. The force has an opportunity to reduce demands on training and abstraction rates for staff if a streamlined approach was considered.
- The content of data on PNC that the force updates is very high. Everything that can be updated is updated and no short cuts are being employed.
- Greater Manchester Police have embraced the principles of the thematic inspection report 'On The Record' and has placed itself in a position as a forward thinking force that operates proactively, providing an ability to react to changes more effectively.

- 1.5.3 The findings of this report should be read in conjunction with the previous reports and recommendations relating to PNC. The previous reports are;
- Police Research Group Report – ‘Phoenix Data Quality’, *published 1998*.
 - HMIC Thematic Inspection Report – ‘On The Record’, *published 2000*
 - HMIC Report – PNC Data Quality and Timeliness, 1st Report, *published 2001*
 - HMIC Report – ‘PNC Data Quality and Timeliness, 2nd Report’, *published 2002*
- 1.5.4 A summary of good practice points, along with recommendations for improvement can be seen in Appendix A of this report.

2. Detailed Findings and Recommendations

2.1 Leadership

- 2.1.1 Leadership within Greater Manchester Police is considered to be an area of strength. The level of knowledge, interest and enthusiasm shown by the ACC who has ownership of PNC issues within his portfolio encouraged HMIC PNC Compliance Auditors.
- 2.1.2 The force has a well established PNC Steering Group (PSG) with a broad spectrum of members from across the force. Members of the group are drawn from strategic ranks within the organisation ensuring that the aims and objectives are driven forward and there is less risk that the issues discussed within the group become diluted. HMIC PNC Compliance Auditors also noted that in the case where the ACC is not available to chair the meeting, the chairmanship is not delegated, the meeting is re-scheduled to ensure that the ACC can attend. This is considered good practice.
- 2.1.3 Prior to the inspection, the PSG had been meeting on a monthly basis, however a decision has been made recently to adjust the frequency of the meeting to bi-monthly. HMIC PNC Compliance Auditors view this as a positive approach to ensure that momentum of PNC issues is maintained. A meeting schedule that is too frequent poses the risk of apathy amongst members if there is no update on actions because insufficient time has elapsed between meetings. It was also noted during the inspection that there is a good level of awareness amongst senior staff of the existence of the PSG, ensuring that issues would be raised if they became applicable. Overall, HMIC PNC Compliance Auditors felt that the PSG was operating in such a way that it is being managed effectively and is able to respond to changes that may affect the force, or its performance in relation to PNC.
- 2.1.4 However, whilst the level of knowledge of the group at senior level is good, there was a low level of awareness at operational level. Whilst this does not affect the strategic input of the group, it does restrict the input of operational staff as there is no mechanism for those staff to raise issues. Some staff commented that they would raise issues with the PNC Liaison Officer or a member of staff in the Criminal Records Unit, however, it is unlikely that these issues will make it to the agenda of the PSG if all implications have not been considered. In view of this, HMIC PNC Compliance Auditors are of the opinion that the introduction of a PNC User Group would provide benefits to the force regarding PNC issues. The existence or creation of a user group was raised during some focus groups, but staff were unaware whether a decision had been made to progress this matter. A user group would enable the force to tap into the array of knowledge and experience within a force of this size and ensure that any ideas or proposals are contextualised before being considered for a strategic decision at the PSG. A PNC User Group would also provide benefits in marketing PNC issues locally around the force.

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that the force consider the introduction of a PNC User Group to enable discussion of PNC matters at an operational level. Any new group should be chaired by an existing member of the PNC Steering Group to provide a direct line of communication between the two groups. Consideration should also be given to the planning of meetings to ensure that both meetings coincide.

- 2.1.5 HMIC PNC Compliance Auditors also reviewed the level of accountability placed upon officers concerning the submission of data for update to PNC and the use of management information to support this process. HMIC PNC Compliance Auditors found that the force takes a positive approach to the quality and timeliness of submission of data with accountability being held at various ranks throughout the organisation. The accountability has been made possible through the production of detailed management information from the Criminal Records Unit (CRU).
- 2.1.6 The CRU records and disseminates data on the quality of source input documents that have been submitted. The data provides analytical capability to determine what types of errors are being made and which officers are making the errors. The CRU also records and disseminates details of all late submissions to enable senior staff to identify any common causes or to provide advice to officers on correct procedure. HMIC PNC Compliance Auditors view the level of management information being provided as good practice.
- 2.1.7 The management information produced by CRU is used widely across the force. The force has a structure that enables it to continually monitor performance across a wide range of policing issues, including PNC performance. **GMP Review to Improve Performance (GRIP)** is a series of meetings held by supervisory staff to hold their staff accountable. GRIP Meetings are now embedded within the culture of the force and they range from Chief Offices discussing performance with BCU Commanders to shift supervision holding operational staff accountable for performance whilst carrying out their duties.
- 2.1.8 PNC performance is raised during the GRIP meeting when there has been under performance in a particular aspect of PNC or by a particular BCU. Evidence was provided during the inspection of the type of data used during GRIP meetings. Anecdotal evidence was also provided that PNC Matters are also discussed in the Territorial Commanders Group, a meeting of BCU Commanders that is held prior to the GRIP meeting with chief officers. BCU commanders also informed HMIC PNC Compliance Auditors that the information they receive on a monthly basis from CRU is useful and sufficient for them to take appropriate action without the need for further analysis. The structure clearly outlines the commitment of the force to have PNC data submitted in a timely and quality manner.
- 2.1.9 Whilst the recording and use of management information is good within the force, HMIC PNC Compliance Auditors made one observation where the force could become more efficient.

- 2.1.10 One of the factors for the return of a poor quality source input document is the existence of a crime number for a reportable offence. If the crime number is not appended to the source input document, the form is returned and an error is recorded against the officer in the case. However, during interviews and focus groups, staff reported that there are currently long backlogs on the force Crime Input Bureau, sometimes up to 66 hours and if they were to wait for the crime number to be available, submission of the form would fall out of the 24 hour threshold.
- 2.1.11 When a form is submitted without a crime number and it is something out of the control of the officer, staff in CRU continue spending time with administrative tasks in recording the information and returning forms. HMIC PNC Compliance Auditors are of the opinion that in times where there are backlogs in the crime input bureau, staff in CRU should continue to record and monitor the supply of crime numbers but their time would be more efficiently used if forms were not returned where the error is beyond the control of the officer. The time spent by staff would be better used to search for crime numbers using their own access to the crime recording system.

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that when the sub-standard source documents are submitted and the cause is beyond the control of the officer making the submission, CRU staff do not return the form but record the issue for analysis and decision making in the future.

2.2 Policy and Strategy

- 2.2.1 With regard to policy and strategy, the inspection focused on a number of areas that warrant review. These can be described under four broad headings: PNC Policy & Strategy; Security and Data Protection. Each of these themes is discussed in further detail below.
- 2.2.2 PNC Policy & Strategy
- 2.2.2.1 Under this heading, HMIC PNC Compliance Auditors reviewed whether the force has strategic direction or whether it is in situation where it can only react to internal changes or external influences, for example, the publication of the code of practice. In addition, the number and types of policies were reviewed and also whether relevant staff were of the existence of certain policies.

- 2.2.2.2 Strategic direction for PNC is provided through the mission statement and stated objectives of the PSG. Whilst this is not a formalised strategy document, HMIC PNC Compliance Auditors are happy that in combination with the strong position of the PSG, the objectives and the group have enabled the force to become proactive in terms of the PNC. Any changes that affect the force, or are likely to have significant impact upon the force, for example, Schengen, are quickly added to the agenda to ensure that all implications to the force are considered.
- 2.2.2.3 Further examples of the strategic direction of the force are the development of other strategies that are owned by the PSG, a good example is the development of a marketing strategy. The marketing strategy resulted from an action from the PSG and whilst an individual owner had been allocated to the strategy, the PSG received regular progress reports through the PSG agenda.
- 2.2.2.4 With regards to PNC policies, HMIC PNC Compliance Auditors were pleased to note the existence of relevant policies for the management of PNC, including the timely submission of data to comply with the Code of Practice for PNC. Policies are clearly written outlining the individual responsibilities of staff involved in particular processes, for example, the policy relating to the submission of source input documents shows the responsibilities of the officer in case, the custody staff and staff in the CRU.
- 2.2.2.5 All policies are stored on the force intranet and they are also circulated on Chief Constable's Orders which are produced on a weekly basis. HMIC PNC Compliance Auditors were encouraged to learn that all staff were aware of the policies and where they can be found. Staff also reported that they are aware that failure to read the weekly Chief Constable's Order cannot be used as mitigation if they have failed to carry out their responsibilities effectively. This is good practice and adds to the level of accountability placed upon officers and staff throughout the force.
- 2.2.3 Security
- 2.2.3.1 HMIC PNC Compliance Auditors found some good practice but also areas for improvement with regards to the provision of security of the PNC.
- 2.2.3.2 Good practice was found in the administration of user access. The System Management Unit (SMU) which is headed by a manager, who also assumes the role of PNC Liaison officer, is responsible for the administration of user access for a number of systems within GMP, including the PNC. A team of system administrators manages the user access for PNC using a database that has been developed on Lotus Notes and provides an electronic record of all PNC trained staff, including the level of training provided, the trainer who provided the training and the dates the training took place.

- 2.2.3.3 The Notes database is updated in one of two ways. When a full class takes place at the force training school, a fax is sent to the SMU containing details of all successful trainees from the course. The system administrators update the database with the relevant details and make the necessary amendments on PNC. In addition, the database provides the facility for trainers to log in themselves to generate the record. This function generates an e-mail to SMU that a new record has been added resulting in the PNC being updated accordingly. SMU manages access to the Notes database and the facility for creating new records is only available to accredited trainers.
- 2.2.3.4 With regard to members of staff who leave the force or change jobs within the force, a list is generated by the Personnel department and sent to the SMU on a fortnightly basis. A check is made of PNC for each member of staff on the list to ensure that user IDs are deleted or amended accordingly. In addition, the weekly Chief Constable's Order contain information on people who leave the force or change jobs and these are reviewed as a fall back for the fortnightly list.
- 2.2.3.5 The process for the management of user access is also part of an audit programme carried out by Greater Manchester Police Authority (GMPA). The GMPA carry out an internal audit role and provide an independent assessment of the process, resulting in a formal report and making recommendations where necessary.
- 2.2.3.6 Another aspect of security that was reviewed by HMIC PNC Compliance Auditors was the Information Security Policy (ISP). The force has a Security Committee chaired by the Assistant Chief Constable (ACC) Specialist Operations, which has ownership of the ISP. The force has an overriding ISP supplemented with individual System Security Policies for each of the systems that the force uses. However, the PNC System Security Policy has not been reviewed for three years during which time, the force has introduced alternative methods of accessing the PNC via the force network.
- 2.2.3.7 The force is currently planning the implementation of the Government Protective Marking Scheme (GPMS) which will also act as a catalyst to review the existing security policies that are in place, including the PNC. This review is planned for the autumn of 2005 and should therefore ensure that all policies are up to date.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that the force ensures that plans to review security policies are carried through to ensure all existing policies remain relevant and up to date.

2.2.4 Data Protection

- 2.2.4.1 The Information Management Section (IMS) has responsibility for Data Protection issues and has a line management structure through Legal Services in the Criminal Justice Division. This means that in terms of chief officer responsibilities, the same ACC has overall responsibility for the management of PNC and also the staff who are charged with auditing of the system. This structure results in a loss of independence in the process of auditing carried out by Information Management staff. IMS staff are in effect reporting to the ACC on issues that are under his immediate control. It is the view of HMIC PNC Compliance Auditors that Data Protection Auditing should fall within a structure in which there is no operational responsibility, for example, within Professional Standards or reporting direct to the DCC.
- 2.2.4.2 Another example in which independence is being compromised within IMS is the ability of staff within IMS to update the PNC. If during an audit an error is found, staff in IMS will make the necessary correction to PNC themselves and advise the relevant unit that an update has been made. For example, If an update is made to a nominal record, the Criminal Records Unit is informed. However, if IMS continue to update the system, there becomes a requirement to audit the work of the section to ensure that assurance is provided to the force. A better solution would be to remove all update facilities from IMS and transfer responsibility for immediate correctional updates to units who currently manage those parts of the system. This change would have minimal impact on the units concerned and would ensure that the work of IMS remains independent.
- 2.2.4.3 HMIC PNC Compliance Auditors also reviewed the planning and level of PNC auditing that is carried out by IMS. Although no current audit plan is in place, the Corporate Information Manager has taken steps to initiate the development of a plan. The plan will be produced using the risk assessment model in the ACPO Data Protection and Audit Manual and include the opinions of systems owners throughout the force. This is currently awaiting approval from the ACC. The delay in producing the plan has been as a result of a restructure within the force that meant that the IMS transferred from one department to another.
- 2.2.4.4 In the absence of the plan, staff from IMS have consulted departmental managers and system owners in order to identify areas of particular risk to the force. In terms of PNC, audits of the Stolen Vehicle and Property indices have been identified as they pose a high risk to the successful use of Schengen when it is introduced. In the 12 months prior to the inspection, audits had been carried out on the Wanted/Missing Index and Warning Signals. In February 2004, the force also completed a Sex Offenders registration audit and between 2003 and 2005, an audit was completed of the forces own Operational Intelligence System (OIS) which also included a comparison with local records against those held on the PNC. Whilst auditing has been limited, HMIC PNC Compliance Auditors were pleased to note that PNC applications form an integral part of the 2005/6 Strategic Audit Plan that is currently awaiting approval.

- 2.2.4.5 Nevertheless, despite the limited range of auditing that has taken place, HMIC PNC Compliance Auditors were pleased to note that auditing is process based. This means that whilst data is being checked for accuracy, IMS staff also review how the data is processed to ensure that risks are minimised and that the force is maximising opportunities for efficiency. This is considered to be good practice.
- 2.2.4.6 IMS are also responsible for being the central point of contact and repository for the Transaction Monitoring carried out by the force. Transaction Monitoring is a process by which the force should be able to validate that a certain number of transactions carried out on the PNC are done for a legitimate policing purpose. Due to the size of the force and the number of transactions it carried out, GMP have identified individuals on each BCU and in each department to have responsibility to conduct the checks on a local basis. The results of the checks should be forwarded to IMS for collation and recording. The process is also supported by comprehensive guidance which outlines the individual areas of responsibility.
- 2.2.4.7 When the checks are carried out, transactions conducted locally are selected at random and a form is sent to the officer making the check or the officer requesting the PNC enquiry. The officer must complete the form with details of the enquiry and return it to the local officer who is responsible for the process locally. The form does not have to be endorsed by any line managers. Once forms are returned, the local liaison officer records the details of the check, including the legitimacy and the quality of the transaction data, for example, originator line and reason code, before sending the data onto IMS.
- 2.2.4.8 However, HMIC PNC Compliance Auditors learned that there is currently nobody in IMS receiving all of the results from Transaction Monitoring. They also learned that the process is not being conducted in each BCU or department. The level of monitoring and time expended on the process varies between different BCUs. For example, in one BCU a number of staff stated that they had not received transaction monitoring forms for 'a while' whilst in another, the forms were sent on a regular basis. On the BCU where monitoring is taking place on a regular basis, a police officer currently spends approximately 1 day per week conducting the checks and managing the local administration of the process. Without the central control by a member of staff in IMS, the force is also losing independence in the process because BCU staff are in effect auditing themselves.
- 2.2.4.9 HMIC PNC Compliance Auditors are of the opinion that due to the current approach to the transaction monitoring process, whereby no collating of responses is happening, the force cannot be assured that the process is being carried out effectively. Anecdotal evidence was obtained during interviews and focus groups that the process was seen as a bureaucratic administration task and was not a deterrent against misuse of the system. Staff stated that the biggest deterrent against misuse was the publication of the results of discipline hearings in the weekly Chief Constable's Orders.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that the force should;

- **Review the organisational positioning of the Information Management Section to ensure that independence is returned to the unit, including the removal of PNC update facilities from staff in the unit**
- **Review the current arrangements for transaction monitoring in order to reduce the administrative burden and to ensure that the process is seen as a suitable deterrent to misuse of the system**

2.3 People**2.3.1 PNC Awareness**

2.3.1.1 HMIC PNC Compliance Auditors were pleased with the level of knowledge of the PNC amongst officers throughout the force. The force has undertaken marketing activity under the auspices of the PNC Steering Group, utilising the expertise of the force public relations staff. A marketing plan has been developed containing a number of specific actions to be carried out, including a poster campaign and drawing on the services of PITO Customer Services to provide a number of presentations to CID staff to raise the awareness of PNC as an investigative tool.

2.3.1.2 In addition, within the CID environment, the use of PNC as an investigative tool is also reinforced in Senior Investigating Officer (SIO) Investigative Strategies. These strategies provide guidance to an SIO when conducting major investigations and PNC forms an integral part of this process. HMIC PNC Compliance Auditors consider this to be good practice. Another positive aspect of the CID environment is that the force has a SCAS referral officer based at the Force Intelligence Bureau (FIB) and the completion of the SCAS form is one of the first fifty actions that must be completed if the crime fits the criteria for SCAS.

2.3.1.3 Whilst there is good awareness amongst CID staff and some uniform staff, HMIC PNC Compliance Officers were informed that some communication is 'hit and miss' and that some staff usually find out through word of mouth. In addition, during interviews and focus groups, uniformed staff on BCUs stated that they had not been in receipt of the presentation from PITO or GMP staff and this is considered an opportunity in which the force can close the gap that has occurred in the knowledge between various officers.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that the force consider broadening the scope of staff who receive the presentations by PITO, to ensure that BCU staff are made aware of all PNC functionality.

- 2.3.1.4 With regard to new staff entering the force, particularly probationer constables, the force is currently reviewing the amount of information provided to staff during their initial training. Historically, probationer staff were given an overview of the system at Stage 3 of their training, however, following evaluation of the effectiveness of this approach, a review has been conducted. The result of the review is that PNC overviews will be delivered in 'bite size' chunks through numerous stages of the training, rather than a one off session that is likely to have little impact on the staff.
- 2.3.1.5 The new structure had not been implemented at the time of the inspection but HMIC PNC Compliance Auditors were provided with a copy of the proposal. The proposal illustrates that PNC overviews will be provided throughout the whole of the training, focusing on specific areas that are relevant to that stage of training. HMIC PNC Compliance Auditors consider this to be good practice but also encourage the force to evaluate the effectiveness as the proposal is implemented.
- 2.3.2 Training
- 2.3.2.1 PNC Training is available in the Criminal Records Unit (CRU) and from the Communication and Specialist Training Unit within the Learning and Development Branch that is based at the Force Training School at Sedgeley Park. The CRU has a training section that is a dedicated training resource for its own staff. The force training school provides a service for the remainder of the force offering a full range of courses from enquiry, vehicle/property update, VODS and QUEST.
- 2.3.2.2 Within the CRU, training is planned to coincide with the start date for new recruits to the office. The training section provides induction for staff, PNC training and mentoring where necessary. With regards to PNC training, the force delivers courses in accordance with national standards and all staff are assessed at the end of the course. New staff receive an enquiry course as their initial training for which they must successfully complete a formal assessment before progressing on to update training. Update training is given for the whole of the offence processing element of PNC, including creation of arrest/summons reports and court results to ensure that staff can identify the links between the initial arrest and the final disposal at court. The training is supported by mentors in the work place and all new staff have all of their work checked for quality with a feedback mechanism to training if issues are identified.
- 2.3.2.3 Whilst the force has a rolling recruitment programme, the training section are not focused on training new staff all of the time. During interim periods, training staff are also responsible for delivering supplementary training to existing staff, for example on the more complex of areas of PNC like the wanted/missing index. Training staff are also responsible for ensuring that procedural guidance is kept up to date for each section within the unit.
- 2.3.2.4 In addition, CRU operates a career grading structure for new staff. Once a member of staff has completed two years service, the member of staff must complete successfully a further assessment before progressing up the pay scale. The second assessment tests the retention of knowledge of the member of staff and has a strict pass mark of 90%. The training section within CRU is responsible for conducting these assessments and providing feedback to management.

- 2.3.2.5 In addition to CRU staff, there are twelve accredited PNC trainers at the force training school. Accredited trainers are responsible for the delivery of PNC courses as well as other IT related courses. Training provided by the force training school is planned a year in advance following an annual training needs analysis conducted across the force. The TNA enables the force training school to allocate time for certain courses depending on demand in addition to some courses that are permanent fixtures within the training programme, e.g. training for Operational Communications staff.
- 2.3.2.6 The training courses are modular based and in accordance with national standards outlined by Centrex. All courses have a formal assessment at the end in which candidates are required to achieve a pass mark of 90%. HMIC PNC Compliance Auditors also found that during interviews and focus groups, staff had not experienced any significant delays in obtaining courses when there was a specific need for their role.
- 2.3.2.7 Overall, the provision of training within the force is considered to be good, however, there are a couple of issues that the force should consider. Anecdotal evidence was provided to HMIC PNC Compliance Auditors that following the devolution of financial responsibility to BCU finance managers, inconsistencies in the approval for courses had been experienced. An example was provided where a course for a particular role had been approved in one BCU but in a similar role on another BCU had been refused. The reason for refusal had been a financial one. Unfortunately, during the inspection, HMIC PNC Compliance Auditors were unable to validate this claim, however, they had been informed that PNC access was provided depending on the role being carried out. Therefore, if there is a need to receive training to carry out the role, training should have been considered.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that the force clarify the situation concerning the responsibility for approving training courses. Training should be driven by role requirement and there must be consistency between BCUs.

- 2.3.2.8 In addition, during focus groups, a number of staff who had access to the Driving Licence and Vehicle Insurance databases were unaware of the current restrictions surrounding the use of the information. Some staff commented that they had received access to the data without any training so were therefore not informed on the restrictive use of the data.

2.4 Partnerships and Resources

- 2.4.1 The force has placed itself in a good position with external agencies concerning the management and use of the PNC. A range of relationships has been developed from Chief Officer level to PNC operator within the CRU.

- 2.4.2 The ACC with responsibility for Criminal Justice, including PNC, is the vice-chair of the Local Criminal Justice Board (LCJB). Through his work as chairperson of the PNC Steering Group, he is ideally placed to raise issues with external agencies if they have an effect on the PNC performance of the force. In addition to the LCJB, BCU commanders are also members of Local Criminal Justice Groups (LCJG) which provide a similar role but at local or BCU level. Similarly, the role of the BCU Commander in the group enables them to tackle issues with individual courts if concerns are raised by the force. The improved communication between agencies has resulted in court data being supplied electronically and in most cases in a timely manner. The force has also introduced performance data that is used in collaboration with the Magistrates Courts Service to identify courts that are failing to meet the target for the supply of data.
- 2.4.3 At a lower level, PNC operators on the Court Results section within CRU have been empowered to develop informal working relationships with staff based within the courts. Whilst not being able to tackle strategic issues, the development of the relationships has improved the ability of staff to resolve day to day issues, ensuring that data held on PNC is accurate and up to date. During focus groups with CRU staff, HMIC PNC Compliance Auditors were informed that staff felt they were able to complete their tasks more efficiently having made useful contacts within the courts.
- 2.4.4 HMIC PNC Compliance Auditors were also pleased to note the existence of formal data sharing protocols between the force and the external agencies, for example, environmental health staff. The protocols reduce the risk of disclosure to unauthorised staff by providing guidance on who the data can be disclosed to and the level of data they are entitled to. The protocols have been produced and are owned by the Data Protection Officer.
- 2.4.5 Another area that HMIC PNC Compliance Auditors reviewed under this protocol heading was the effectiveness of the force when attending regional and national PNC meetings. The force currently chairs the North West Regional PNC Liaison Officers Conference and also has a representative on the national Names Working Group. These two roles ensure the force is suitably placed to respond to changes in policy and procedure or to become aware to changes in PNC functionality.

2.5 Processes

- 2.5.1 In terms of processes, HMIC PNC Compliance Auditors found a number of issues within Greater Manchester Police that are worthy of note in this report. These relate to the source input document (208), Data Quality, Operational Communication Rooms, M.O. Keywording, Ad-Hoc Intelligence Updates and the Originator Line.

2.5.2 Source Input Document (Form 208)

- 2.5.2.1 Over the last twelve months, GMP has redesigned the process for notification of offenders to PNC. The force introduced a new custody system that has an interface to send the data to PNC. The new process involves the officer in the case completing a manual copy of the form 208 which is subsequently updated to the custody system by a member of the custody staff. Upon completion of the update to the custody system, the system generates a hard copy of the form 208 which is sent to the CRU together with the original handwritten document for complete update and quality control.
- 2.5.2.2 When reviewing the process and carrying out reality checks of the documents, HMIC PNC Compliance Auditors discovered that dates being sent to PNC which are used to calculate the timeliness statistics on a monthly basis are not in accordance with the codes of practice that came into effect on 1st January 2005. The code of practice 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.
- 2.5.2.3 HMIC PNC Compliance Auditors learned that although the arrest time and date are recorded on the custody system, the interface does not send this, an alternative time and date are sent depending on the outcome within the custody suite. For example, if a person is released on police bail to return to the police station at a date in the future, the time and date of the transmission of data is recorded on the PNC. For all other cases, the time and date of the decision by the custody officer is recorded on PNC.
- 2.5.2.4 During reality checks of documents, none of the cases would have affected the overall statistical performance of the force, however, HMIC PNC Compliance Auditors were informed 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.
- 2.5.2.5 In addition to cases that are transferred via the interface, HMIC PNC Compliance Auditors investigated the process for non-custody cases, for example summons cases. Analysis of data on PNC showed that in May 2005 over 11% of cases generated by the force were as a result of a summons being issued. Therefore, if the process for these cases is failing, the force would find it difficult to achieve and maintain the timeliness target of 90% within 24 hours.

- 2.5.2.6 HMIC PNC Compliance Auditors found that the process has recently been changed to ensure that summons cases are submitted in a timely manner to the CRU for direct input onto PNC. Each BCU has a clerk who deals with summons cases and at the time when a decision is made to issue a summons, the clerk must fax the information to the CRU. This process is backed up by an entry in the Chief Constable's Orders and in addition, CRU staff collate management information for BCU commanders to identify any cases that miss the 24 hour deadline. HMIC PNC Compliance Auditors are content that the force has addressed this issue to ensure that all updates are made in a timely way.

Recommendation 7

Her Majesty's Inspector of Constabulary recommends that the force investigate the anomaly concerning the dates that are transferred and subsequently recorded on PNC. The Code of Practice for PNC states that target is derived from the commencement of process, therefore, the dates recorded on PNC must reflect this to ensure accurate calculating of performance.

2.5.3 Data Quality

- 2.5.3.1 Within CRU, a Data Quality section is responsible for ensuring that accurate data is updated on the PNC names application by GMP. The section quality assures source input documents and court results from both the crown courts and the magistrates' courts.
- 2.5.3.2 During the inspection, HMIC PNC Compliance Auditors carried out reality checks of PNC records against the corresponding source input documents. When the forms are received in the CRU, the Data Input Section reviews the records against the forms and makes any further updates that have not transferred across the interface. From the Data Input section, the forms are sent to the Data Quality section for the quality assurance process. The target of the data quality section is to quality assure at least 40% of all cases updated to PNC.
- 2.5.3.3 However, during the reality checks, it was discovered using a week chosen at random that only 4% of forms had been checked. Furthermore, HMIC PNC Compliance Auditors found high error rates for forms that had not been quality assured and also for those that had been subject of the quality assurance process. The majority of errors are classed as minor in that there would be no significant impact upon operational policing, nevertheless, due to the fact that in some cases the 208 passes through two sections within CRU, the error rate can be considered high. The majority of errors were data being omitted on PNC even though it had been supplied on the form. In the sample taken during the inspection, 25% of forms that had been through the quality assurance process contained errors. This figure rises to 60% for forms that had not been quality assured. Using raw data, there is potential that 96% of cases being updated to PNC have a 60% error rate.

- 2.5.3.4 One of the highest risks posed by the error rates is that of apathy amongst officers when submitting the 208 at the point of arrest. The force is very strict with the quality of forms being submitted, using management information to notify BCU commanders of any deficiencies amongst their staff. However, if officers become aware that the data being submitted is not being updated onto PNC, the quality of the forms will invariably decline.
- 2.5.3.5 The force must review the level of responsibility at each level of the update process, from the custody staff, whose work eventually transfers to PNC and the Data Input section within CRU to ensure that records are accurate and complete. The data quality section should employ more stringent checks when carrying out quality assurance to ensure that all updates are being made and no data is being lost.

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that the force enforce a more stringent quality control regime within CRU, both on the Data Input Section and the Data Quality Section to remove any risk of data being omitted from PNC records. Any gaps in the quality must be raised with relevant staff and supervision either at the custody suites or internally within CRU.

- 2.5.4 Operational Communications Rooms (OCRs)
- 2.5.4.1 OCRs provide the call handling and despatch service for the force. There are five control rooms including a dedicated one for the policing of Manchester International Airport.
- 2.5.4.2 In each of the rooms, the radio operators assigned to each BCU carry out routine PNC checks on behalf of officers without the need for officers to change channel on the Airwave radio system. During interviews and focus groups, all officers stated that they could always get a check via the radio and that no delays were ever incurred. Nevertheless, HMIC PNC Compliance Auditors found one area of concern within the OCR environment.
- 2.5.4.3 PNC updates are carried out by staff who operate the 'PNC Desk' in each of the rooms. Any incidents that require a PNC update are switched via the command and control system to the PNC desk so that the operator can make the necessary updates. However, HMIC PNC Compliance Auditors learned that in times when resources were low, for example due to sickness absence or annual leave, the PNC desk is the first resource in the room to be sacrificed. Anecdotal evidence was provided by staff stating that in the worst case scenario, this can result in stolen vehicles being delayed getting on the PNC.

- 2.5.4.4 Furthermore, staff also reported that they often lose their PNC skills due to the rotation system used to staff the PNC desk. All OCR staff receive PNC update training when they progress to becoming a radio operator. However, with the PNC desk being staffed on a rotational basis, and due the number of staff on each shift, staff reported that it can be in excess of five months between periods of updating the PNC.
- 2.5.4.5 HMIC PNC Compliance Auditors are of the opinion that the force is not making best use of its resources in providing update training to all staff and then having to provide mentoring or refresher training when operators have had large gaps between updating the PNC. The OCRs currently have approximately 700 staff who are PNC trained, therefore, the demand on the training school is significant with only a limited number of staff providing the benefit at any one time. The force may wish to consider the development of specialist PNC staff in each of the rooms who are dedicated for PNC input or whether the force would benefit from the introduction of a PNC Bureau.
- 2.5.4.6 By reducing the number of staff assigned to PNC updating, the force will significantly reduce the demand on the force training school for PNC courses. The force will also benefit from the development of 'experts' as their knowledge of PNC increases as they make more use of the system. Abstraction times will also be reduced for OCR staff because they will no longer be required to attend supplementary courses for PNC updating. In addition, the force will develop points of contact for all PNC enquiries, including VODS and QUEST. Currently, a number of staff in OCRs are trained to carry out VODS and QUEST searches, however, their ability to provide a useful service is hindered because they are carrying out operational duties at the same time, for example being a radio operator.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that the force review the provision for PNC updating of vehicles and property records. The force has an opportunity to reduce training demands and abstraction rates if specialist staff, either as a dedicated PNC desk in each room or a PNC Bureau were to be considered.

2.5.5 M.O. Keywording

- 2.5.5.1 M.O. Keywording is a process that provides a searchable database of M.O. data when conducting QUEST searches on the PNC. When offences are recorded on the PNC and a M.O. is provided, the force selects keywords from the M.O. that might be relevant for future searches. Keywords can be the point of entry during a burglary, the age of a victim, the sex of a victim, location of offence or even the character assumed during a bogus official offence. Since the introduction of the facility in 1997 when QUEST was developed, GMP has been one of the leading forces in terms of the number of offences that have been keyworded since the facility was introduced in 1997.

- 2.5.5.2 The current process for Keywording is that all 208 forms are submitted to the M.O. team which is part of the Data Input section in CRU. The M.O. section sifts through all of the forms to identify any cases suitable for Keywording. Once cases have been identified, the staff review any information on the 208 plus anything else that is held on local systems, e.g. the crime recording system. In the event that serious cases are being updated, staff may often request copies of witness statements to ensure that all relevant data is considered for the Keywording process. HMIC PNC Compliance Auditors consider this to be good practice.
- 2.5.5.3 However, whilst the process is good and relevant offences are being captured, during reality checks, a case was found for a conviction of murder in which no Keywording has been carried out. HMIC PNC Compliance Auditors acknowledge that omissions of this nature are in the minority, but nevertheless, tighter controls should be in place to ensure that cases of this magnitude are not missed in the future. Due to the way the current process works, the Keywording is completed before an offender goes to court, therefore, a simple control to implement could be for staff carrying out court results to check that Keywording has been completed if the offence fits the Keywording profile.

Recommendation 10

Her Majesty's Inspector of Constabulary recommends that the CRU implement a process whereby staff updating disposals review the record to ensure M.O. Keywording has been completed if the offence is relevant.

- 2.5.6 Ad-Hoc Intelligence Updates
- 2.5.6.1 Ad-hoc intelligence updates are updates that are made to the PNC where the source of the information is other than an arrest or summons where a source document would be used.
- 2.5.6.2 Currently, GMP does not make any ad-hoc intelligence updates to PNC. The force has concerns over the verification of the information and whether the data would be updated on the correct record in the absence of fingerprints or a DNA sample. However, the force does employ Intelligence Analysts who carry out the rating of intelligence under the 5x5x5 system of rating to ensure that intelligence is serving a useful purpose.
- 2.5.6.3 HMIC PNC Compliance Auditors are of the opinion that if intelligence has been graded under the 5x5x5 system as 'A1' data, the force should have confidence in the use of that data on the PNC. The volume of intelligence that will be applicable to PNC from all intelligence sources would be confined to new descriptions or new addresses, therefore, the force should consider the introduction of a process to ensure that CRU are notified of any updates that are relevant to PNC.

- 2.5.6.4 The lack of ad-hoc updates to PNC was also highlighted in a Data Protection Audit of the Operational Intelligence System (OIS) that was carried out between 2003 and 2005. The scope of the audit was to gauge the level of inconsistencies between the local system and the PNC. The result was that in the sample size tested (200 records) 50% contained errors or inconsistencies. These inconsistencies included records that have been cross-referenced with each other on both systems had differing names or dates of birth, last known addresses of offenders differed between the systems. In 8.5% of the sample used for the audit, the identifiable characteristics on the OIS were more detailed or different than those on recorded PNC. This could result in the inefficient QUEST searches being carried out on the PNC.

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that the force introduce a process for ensuring that relevant intelligence updates are applied to PNC. Once intelligence has been rated and has become fit for purpose, they should ensure the information is also recorded on PNC.

2.5.7 Originator Line

- 2.5.7.1 The originator line on the PNC is a free text field of 72 characters that is used to provide explanation and reference for all PNC transactions. In addition to providing a reference to why a transaction has been carried out, it can also be used as an investigative tool when conducting transaction enquiries (#TE) on historical PNC transactions.
- 2.5.7.2 A #TE can be carried out by any force to view any transactions in the current month plus the previous 11 months made against a person or vehicle. The information on the originator line indicates to the inquiring force who has carried out a transaction and for what purpose. This information can prove valuable during an investigation. In Greater Manchester Police, the quality of the originator line is sufficient to provide both a suitable reference and an aid to investigations. During the inspection, a sample of transactions reviewed provided evidence that the quality is good. In addition, all PNC trained were aware of the importance of completing the field correctly.

2.6 Results

- 2.6.1 In the 12 months to June 2005, Greater Manchester Police have demonstrated overall improvement in their performance, achieving consistently high performance following the introduction of the interface between the custody system and PNC. Between July 2004 and June 2005, the force has achieved performance ranging from 88.1% in July 2004 to a high of 94% in June 2005. During the twelve months periods, performance dropped on a number of occasions as processes were improved following the introduction of the interface. However, over the last five months, performance has been above or just below the target of 90%, indicating that the current performance can be maintained. During the same period, the force has reduced the number of days to enter 90% of cases from a high of 11 days in August 2004 to 1 day in June 2005. Against both indicators, the force is performing better than the England & Wales averages of 85.9% and 1 day respectively.
- 2.6.2 In terms of court results, the force has also made significant improvements in performance. Using data provided by PITO on a monthly basis, the force has improved its performance from a low of 19.8% in July 2004 to a high of 59.6% in June 2005. The latest data in June 2005 is just above the national target of 50% but below the England and Wales average of 65.8%. However, the force has embraced the need to record the timeliness of receipt of the data in order to reflect the true performance of the percentage of results entered within 7 days of receipt. The force records the date that court registers are received and also the date that the information is entered on to PNC. Using the force data, currently only available up to April 2005, it shows performance that 83.9% of magistrates' court cases are entered within 7 days of receipt and 97.6% of crown court cases are updated within the prescribed time. HMIC PNC Compliance Auditors are of the opinion that the force is meeting its target for the input of court results and where failings have been identified in the supply of data from the courts, the force is taking action to resolve the situation.
- 2.6.3 Performance against both of the above indicators should also be taken into context when considering the content of data that GMP updates on the system. The force has taken the decision to ensure that a full record is always updated at the first opportunity, e.g. when the record is created via the interface, ensuring that no skeleton records remain on the system. In addition, when updating court data, the force updates all disposals, remand information including bail conditions and custody histories. In view of the level of detail being updated, the force should be commended on its current level of performance.

- 2.6.4 The number of Impending Prosecutions has increased over the last twelve months by approximately 68% from 17,053 to 28,636. However, the increase is in line with the force's decision to implement the elements of the Criminal Justice Act that allows forces to record details of all arrests and capture fingerprint and DNA information. In light of the significant increase, HMIC PNC Compliance Auditors reviewed the process employed by the force to ensure that old impending cases are dealt with. The force receives data on a monthly basis from PITO to identify any cases that have reached the age of 13 months old. Staff in the CRU populate a database to allow tracking of the cases and carry out investigations to ascertain the result of the case or to see whether the case is legitimately outstanding. HMIC PNC Compliance Auditors are satisfied that despite the inevitable increase in the number of Impending Prosecutions, the force has an effective process to manage the overall numbers.

Appendix A

A Summary of Good Practice within Greater Manchester Police

- A chief officer, the Assistant Chief Constable, has ownership of PNC issues within his portfolio.
- A PNC Steering Group exists and meets regularly to discuss strategic PNC issues and is chaired by the Assistant Chief Constable. If the Assistant Chief Constable is not available, the meeting is re-scheduled.
- Comprehensive and regular management information is provided to Chief Officers and BCU commanders concerning the timeliness and quality of the submissions of source input documents.
- The onus is on staff to make themselves aware of policy and procedural changes through the published Chief Constable's Order.
- The administration of user access is robust with a process to ensure that staff who leave the force have their authorities removed. The process is also subject of independent reviews by the Police Authority.
- Data Protection Audits are processed based to ensure the force maximises its opportunities for efficiency and accuracy.
- The use of PNC as an investigative tool is included in the Investigative Strategies used within Crime Operations and major Incident Teams.
- Awareness of PNC to probationer staff has been broken down into smaller packages to be delivered at various stages of training to ensure that more information about PNC is retained by new staff.
- When carrying out M.O. keywording, staff request copies of witness statements to enable more accurate and relevant recording of keywords to facilitate better QUEST searches in the future.

Summary of Recommendations for Greater Manchester Police

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that the force consider the introduction of a PNC User to enable discussion of PNC matters at an operational level. Any new group should be chaired by an existing member of the PNC Steering Group to provide a direct line of communication between the two groups. Consideration should also be given to the planning of meetings to ensure that both meetings coincide.

(Paragraph 2.1.4)

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that when the sub-standard source documents are submitted and the cause is beyond the control of the officer making the submission, CRU staff do not return the form but record the issue for analysis and decision making in the future.

(Paragraph 2.1.11)

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that the force ensures that plans to review security policies and carried through to ensure all existing policies remain relevant and up to date.

(Paragraph 2.2.3.7)

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that the force should;

- Review the organisational positioning of the Data Protection Unit to ensure that independence is returned to the unit, including the removal of PNC update facilities from staff in the unit
- Review the current arrangements for transaction monitoring in order to reduce the administrative burden and to ensure that the process is seen as a suitable deterrent to misuse of the system

(Paragraph 2.2.4.9)

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that the force consider broadening the scope of staff who receive the presentations by PITO, to ensure that BCU staff are made aware of all PNC functionality.

(Paragraph 2.3.1.3)

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that the force clarify the situation concerning the responsibility for approving training courses. Training should be driven by role requirement and there must be consistency between BCUs.

(Paragraph 2.3.2.7)

Recommendation 7

Her Majesty's Inspector of Constabulary recommends that the force investigate the anomaly concerning the dates that are transferred and subsequently recorded on PNC. The Code of Practice for PNC states that target is derived from the commencement of process, therefore, the dates recorded on PNC must reflect this to ensure accurate calculating of performance.

(Paragraph 2.5.2.6)

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that the force enforce a more stringent quality control regime within CRU, both on the Data Input Section and the Data Quality Section to remove any risk of data being omitted from PNC records. Any gaps in the quality must be raised with relevant staff and supervision either at the custody suites or internally within CRU.

(Paragraph 2.5.3.5)

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that the force reviews the provision for PNC updating of vehicles and property records. The force has an opportunity to reduce training demands and abstraction rates if a specialist staff, either as a dedicated PNC desk in each room or a PNC Bureau were to be considered.

(Paragraph 2.5.4.6)

Recommendation 10

Her Majesty's Inspector of Constabulary recommends that the CRU implement a process whereby staff updating disposals review the record to ensure M.O. Keywording has been completed if the offence is relevant.

(Paragraph 2.5.5.3)

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that the force introduce a process for ensuring that relevant intelligence updates are applied to PNC. Once intelligence has been rated and has become fit for purpose, they should ensure the information is also recorded on PNC.

(Paragraph 2.5.6.3)

Appendix B**Thematic Inspection Report on Police Crime Recording, the Police National Computer and Phoenix Intelligence System Data Quality - 'On The Record'****Recommendation 9** (Chapter 5 page 86)

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

Recommendation 10 (Chapter 6 page 104)

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

Recommendation 11 (Chapter 7 page 111)

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

Recommendation 12 (Chapter 7 page 112)

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

Recommendation 13 (Chapter 7 page 118)

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

Recommendation 14 (Chapter 8 page 145)

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

Recommendation 15 (Chapter 8 page 146)

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

Recommendation 16 (Chapter 8 page 148)

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

Recommendation 17 (Chapter 8 page 150)

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

Recommendation 18 (Chapter 9 page 164)

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

Recommendation 19 (Chapter 9 page 164)

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

Recommendation 20 (Chapter 9 page 165)

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

Appendix C

PRG Report “Phoenix Data Quality” Recommendations

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

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

Appendix D

Police National Computer Data Quality and Timeliness – 1st Report

Recommendation One (Paragraph 5.2)

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

Recommendation Two (Paragraph 5.11)

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

Recommendation Three (Paragraph 5.19)

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

Recommendation Four (Paragraph 5.29)

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

Recommendation Five (Paragraph 5.31)

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

Recommendation Six (Paragraph 5.34)

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

Recommendation Seven (Paragraph 6.10)

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

Recommendation Eight (Paragraph 6.12)

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

Recommendation Nine (Paragraph 6.14)

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

Recommendation Ten (Paragraph 6.16)

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

Appendix E

Police National Computer Data Quality and Timeliness – 2nd Report

Recommendation 1

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

Recommendation 2

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

Recommendation 3

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

Recommendation 4

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

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

Recommendation 5

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