



HUMBERSIDE POLICE

24 - 28 OCTOBER 2005

**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 Humberside Police between 24th and 28th October 2005.

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 3 Borough Command Units (referred to as 'Divisions'). 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 Humberside as a force covers the counties of North East Lincolnshire, North Lincolnshire, East Riding of Yorkshire along with the urban area of Kingston-upon-Hull. This total area of 1,356 square miles centres around the Humber estuary, serving a population of almost 900,000 residents. The number of people served by Humberside Police increases significantly when considering those visiting the area through tourism and travel. It is estimated one million people a year travel to and from Europe by ferry via Kingston upon Hull and a further quarter of a million people on domestic and international flights from Humberside Airport. The area maintains its strong maritime heritage with the Humber ports of Immingham, Grimsby, Goole and Hull, accounting for over 15% of the UK overseas trade, and handling more trade with the rest of Europe than any other British. The principal conurbations are Kingston-upon-Hull, Grimsby, and Scunthorpe. The area's minority ethnic communities are concentrated mainly in Kingston-upon-Hull and Scunthorpe with Chinese, Bangladeshi and Indian being the most populated. The region has a higher than average number of asylum-seekers compared to other non-metropolitan forces.

1.2.2 The Force headquarters is located in the suburbs of Hull. There are four basic command units (known locally as divisions), which are coterminous with the district councils. Humberside Police have embodied a Quality of Life Policing, which is a style developed from public consultation based around local accountability and local responsibility, as well as the resultant reassurance and visibility gained from being locally based. To this end 39 Local Policing Teams have been created, backed by a comprehensive estate development strategy to put their bases central to communities.

- 1.2.3 The Force is headed by the Chief Officer Team comprising the Chief Constable, Deputy Chief Constable (DCC), two Assistant Chief Constables (ACCs) and an Assistant Chief Officer (ACO). The Chief Constable, Tim Hollis, was appointed in April 2005. Humberside Police employs 2,263 police officers, 1258 police staff and 328 Special Constables.
- 1.2.4 The creation of Arrest/ Summons records at Humberside is a semi-automatic process which requires the custody officer to update the Force's NSPIS Custody system with the details required to create a skeleton record on the PNC (the minimum amount of data required to create a new record). This is followed by the arresting officer completing a manual or NSPIS generated source input document (known locally as the '310') which contains all the data required for a complete record on the PNC. This is posted to one of the three geographic Administration of Justice Unit (AJU) who will complete the record on the system. The AJUs a cover the hours of 08:30 to 17:00 Monday to Friday and provide skeleton cover to carry out key tasks on Saturdays and public holidays.
- 1.2.5 Magistrates court results are printed in the AJU's from the courts' system and crown court results are received through the post on manual court registers. These are updated by the Divisional AJUs directly on the PNC.
- 1.2.6 Disqualified Driver records, Wanted/ Missing updates, updates to vehicle reports and warrants cancellations on the PNC are the responsibility of the PNC Bureau (PNCB). The Bureau also provides telephone checks for officers and performs enhanced searches on the system, such as Vehicles On Line Descriptive Searches (VODS) and Queries Using Extended Search Techniques (QUEST). The Bureau provides a 24/7 service to the Force.

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

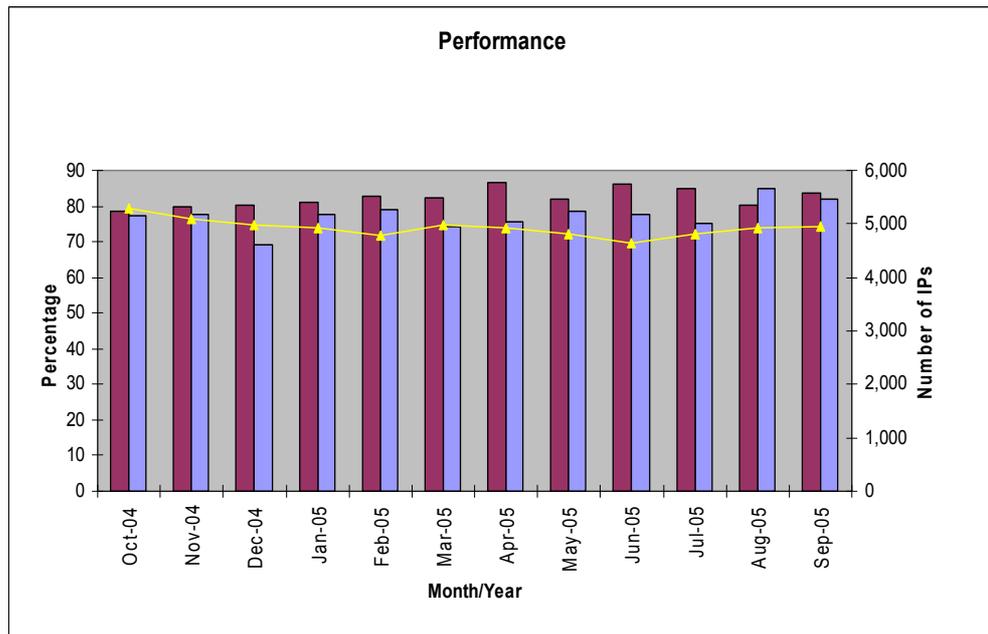
the police. Therefore, the police are measured against an overall target of 10 days.)

1.4.4 In September 2005, Humberside input 83.5% of Arrest/ Summons (A/S) updates on PNC within 24 hours. This shows a slight improvement in performance over the previous 12 months from 78.7% in October 2004. It should be noted that the force has not achieved the target of 90% in any of the 12 months to September 2005.

1.4.5 Humberside’s performance in terms of court results has shown improvement against the Code of Practice target. In October 2004 the Force entered 77.3% of results within 7 days of the court date. This has increased to 82.0% being entered within 10 days in September 2005. As a result the force is achieving the target as set out in the Code of Practice in this area of activity.

1.4.6 In terms of Impending Prosecutions (IPs) Humberside has shown a decrease of 6% in the 12 months to September 2005. 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 Humberside’s performance in the 12 months to September 2005 is shown below:¹



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

- 1.5.2 This assessment is based on the detailed findings of the report which highlight concerns in some areas of activity. In particular, the Force 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 24hours. In addition, the Force should ensure that there is sufficient data protection auditing undertaken to reduce the risk of inaccurate data on the PNC and that it satisfies itself that there is sufficient resilience in the training department to meet the current and future demands.
- 1.5.4 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 At the time of inspection, Humberside had 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 to quarterly once all targets are being met. Stakeholders from across the force are invited to attend the meetings although a review of the minutes showed that there is currently no representation invited from the Communication environment. As officers and staff in this area are likely to be the heaviest users of the system, HMIC Auditors believe that they should be represented at a strategic level. The review also highlighted the fact that whilst divisional 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 include a representative from the communications environment to attend the Steering Group and urges divisional representation to attend the meeting on a regular basis.

2.1.2 Responsibility and Accountability

- 2.1.2.1 Humberside Police has effective measures in place to ensure that late information for submission on the PNC is pursued from individual officers. Monthly management information is produced outlining the performance of each Division in terms of the timeliness of data submission. This is circulated at the monthly Performance Management Group of Divisional Commanders which enables any problems to be addressed at a senior level, where necessary. HMIC Auditors view this as good practice.
- 2.1.2.2 Further good practice was identified within the PNCB and the AJUs where dip sampling takes place of PNC updates. Team supervisors quality check the work of their staff and record the results of their checks. Again this is viewed as good practice.
- 2.1.2.3 HMIC Auditors identified two areas for improvement which would assist the Force in improving data quality and timeliness. First, there is no process in place to promptly identify records which have been created on NSPIS Custody but which have failed to successfully transmit to PNC. As a result, records which fail the interface are being input to PNC

when the disposal information is updated. This will clearly have a negative effect on the Force's A/S performance and on operational policing as records are being created some weeks or months after the initial arrest. Secondly, the management information which is provided to senior officers could be enhanced by including information on the quality of data submitted by officers. The absence of such information means that the Force is unable to rectify the issue of poor quality submissions by officers.

Recommendation 2

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

- **Enhances its current management information on data timeliness to include data quality and;**
- **Implements a process for the prompt identification of cases which have failed to transmit from NSPIS Custody to PNC.**

2.2 Policy & Strategy

2.2.1 PNC Policy and Strategy

2.2.1.1 At the time of the inspection Humberside had a Policy Strategy document which had been revised and approved at the August 2005 PNC Steering Group (PSG). This was supplemented by a strategic action plan which is monitored by the PSG. These two documents ensure that the Force gives 'ownership' of issues to individuals or departments and is proactive in its management of PNC.

2.2.1.2 In addition, Humberside has documented policies with regard to PNC usage which are publicised on the Force Intranet in the 'Practice Directions'. The policies are therefore easily accessible across the Force and ensure that each individual officer and staff member is aware of their personal and collective responsibilities in relation to PNC.

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 PNCB supervisor. 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 and any suspended officers and staff have their PNC access amended or revoked as necessary. In addition, whilst HMIC Auditors do not question the integrity of the work of the PNCB 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 3

Her Majesty's Inspector of Constabulary recommends that Humberside:

- **Introduces a process to ensure that officers and staff who are on long term sick leave or who are suspended 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 Humberside this is a function of the PNCB supervisor and the Information Compliance Unit who select eight transactions at random daily for verification. 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 During focus groups, officers reported that this process would be more effective as a deterrent against PNC misuse or abuse if the checks were conducted more frequently and the validation requested more speedily. At the time of inspection, validations could be requested up to a month after the PNC check had been performed and some officers reported not having been asked to verify their reasons for a check for up to 10 years. In addition, HMIC Auditors found that communications officers and staff are not included within the current process and are therefore never asked to validate their PNC checks despite being some of the heaviest users of the system at Humberside. HMIC Auditors are therefore of the view that this audit process is insufficient to act as an effective deterrent measure.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that the Force reviews its transaction monitoring procedures to ensure that a robust process is in place to detect misuse and or abuse of the PNC.

2.2.2.5 Data Protection Audits are conducted by the Data Protection Officer (DPO) at Humberside. The DPO performs an annual risk assessment of its IT data systems following which decisions are made as to which systems are audited. This process complies with the ACPO Data Protection Audit Manual. Upon completion of an audit the recommendations are provided to the PNC Steering Group and divisional commanders and departmental heads have the responsibility for ensuring that all relevant actions are completed.

2.2.2.6 However, the Data Protection Department had recently recruited two new members of staff who are in the process of being trained to undertake audits. As a result, the department had fallen behind against its audit plan for the year and it was not certain that the plan could be met in the time available. In the current climate post Richard Inquiry, it is imperative that forces ensure that data protection issues can be identified and rectified as a matter of priority. In addition, HMIC Auditors believe that making the PNC Steering Group responsible for ensuring that audit recommendations are implemented forcewide would improve on the current process by guaranteeing a corporate approach and introducing an additional level of accountability.

Recommendation 5

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

- **Ensures that sufficient data protection auditing is undertaken of the PNC;**
- **Introduces a mechanism to ensure the implementation of data protection recommendations forcewide.**

2.2.2.7 HMIC Auditors also reviewed the role of the Professional Standards Department (PSD) with regard to PNC issues at Humberside. The PSD is independent of operational activities and such independence is viewed as good practice. In addition, the Data Protection Officer has strong links with the PSD which ensures that the PSD is notified of any breaches of system security. The inclusion of PNC trained operators in the PSD would enable them to independently conduct investigations involving PNC activity and to be proactive in the investigation of system misuse and abuse.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that the Force considers the introduction of a PNC capability within the PSD environment.

- 2.2.2.8 Finally with regard to PNC system security, HMIC Auditors reviewed the role of the Information Security Officer (ISO) and Data Protection Officer (DPO) with regard to training. At present, training on DP and IS issues is delivered as part of the overall PNC training, by the Force's PNC accredited trainers. It was pleasing to note that the ISO and DPO have provided training material and, in the past, have attended PNC courses to provide an input. The Force was in the process of implementing a computer based training package and it was planned that this would be rolled out one Division at a time. HMIC Auditors would encourage the Force to progress this implementation and ensure that all police officers and staff undertake the new training package.

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 QUEST was very low. It was pleasing to note that officers and staff were aware of the restrictions surrounding the use of driving licence and insurance information and are therefore unlikely to be utilising this data inappropriately. There was also a good level of awareness by officers of the link between the completion of the '310' and PNC including their responsibilities to ensure that PNC records are kept complete, accurate and up to date.

- 2.3.1.2 However, the Force relies heavily on its intranet for communication, thus placing a reliance on officers and staff to find information for themselves. 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 7

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 PNC training was a further area at Humberside where HMIC Auditors identified concerns. The Force has two accredited PNC trainers, one of whom is dedicated to delivering only PNC training. This provides little resilience for the Force and in the past arrangements have been made with neighbouring forces to provide PNC courses. However, this has been done on an ad hoc basis and a more formalised arrangement with a neighbouring force would enable Humberside to deliver training to meet demand on an ongoing basis and would provide some resilience to the current arrangements.

2.3.2.2 Furthermore, there were concerns raised with regard to training availability and prioritisation. At the time of the inspection, the Force had a backlog for the delivery of PNC awareness training to probationers, although it was reported that additional courses were being run to manage this situation.

2.3.2.3 HMIC Auditors also noted that it was the responsibility of each Division to nominate individuals for PNC training on a quarterly basis. Once the bids are in, the volumes are reviewed by the Training Supervision Board which then determines the number of courses to be run in the next quarter. As a result of some Divisions wanting to keep their abstraction rates to a minimum, officers who had requested PNC training and required it as a core part of their role, had been successively denied (one case was reported of a custody officer waiting 10 years and still not PNC trained). This is a situation which the Force needs to address if officers and staff are to be able to perform their duties effectively.

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 plans to start reassessing PNC operators and to provide PNC refresher training where necessary. HMIC Auditors would encourage this course of action. The Force had already good practices in ensuring that all course attendees are subject to a formal assessment prior to being given access to the PNC and the course content included data protection and information security issues throughout.

2.3.2.5 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, evaluation of the effectiveness of training once it has been put into practice back in the workplace had been conducted with the AJU staff who had attended the PNC names update course. HMIC PNC Compliance Auditors view the implementation of such an evaluation process to be good practice as it assists in improving training design and delivery and would encourage this system of evaluation to be extended to cover all PNC courses.

Recommendation 8

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

- **Considers options available to provide resilience to the current PNC training arrangements to ensure that training needs can be met;**
- **Reviews its process for prioritisation of places for courses to ensure that those who require PNC in exercise of their daily duties receive training at the earliest opportunity;**
- **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.**

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 Criminal Justice 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. HMIC Auditors would therefore encourage the Force to introduce Service Level Agreements with its NPPAs to achieve this.

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 Humberside Police has not yet been able to achieve the Code of Practice target. In addition, HMIC Auditor reality checks showed that the Force was failing to update the full record promptly with records taking an average of 4 weeks to receive a full update and therefore the record remains in skeleton form on the PNC for this period.

2.5.1.3 Furthermore, HMIC Auditors noted that officers are frequently recording "No Change" on the '310s' with regard to an offender's descriptive details. Three out of twenty '310s' examined by HMIC Auditors had been completed in this way and there is a risk that officers are adopting this procedure to save time and vital intelligence could be lost.

2.5.1.4 In addition, HMIC Auditors observed cases being captured in the live environment, i.e. in the custody suites. These observations showed that pre-charge bail conditions (i.e. those being imposed by the police prior to a person being charged) are not always being captured for update on the PNC within 24 hours. HMIC Auditor reality checks on the system showed that the information is being updated promptly in some cases but for those cases which are missing this data, operational policing activity could be adversely affected.

2.5.1.5 Finally, when carrying out reality checks of documents, HMIC Auditors discovered that the dates being sent to PNC, which are used to calculate the timeliness statistics on a monthly basis, are not in accordance with the Code of Practice that came into effect on 1st January 2005. 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. At Humberside, the time and date of the decision (e.g. to charge/ bail/ release) by the custody officer is transmitted from NSPIS to PNC. During reality checks of documents, none of the cases would have affected the overall statistical performance of the Force, 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 9

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 Use of NSPIS Custody

2.5.2.1 Humberside Police has the NSPIS Custody system rolled out across the Force. The system is now well established and the Force relies on the system to update PNC records. During the inspection HMIC Auditors obtained anecdotal evidence of delays being caused in the custody suites as a result of too few officers being trained and insufficient terminals being available within the suites. This evidence was supported by HMIC Auditors observing activities in the custody suites.

2.5.2.3 In particular, long delays can arise when additional charges and/ or charge details need to be updated. The Force would be able to process people through the custody suites more efficiently and effectively if more terminals were available and more officers in the use of NSPIS Custody as, under current arrangements, queues can form as only one officer and or terminal is available to update data.

Recommendation 10

Her Majesty's Inspector of Constabulary recommends that the Force reviews the processes and resources in place for the update of NSPIS in the custody suites to ensure that the efficiency and effectiveness of updates can be improved and sustained.

2.5.3 Non – custody cases

2.5.3.1 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 Humberside there is a process for ensuring that the skeleton record is created on PNC within 24 hours in the case of Fixed Penalty Notices. This should be followed by a form (referred to locally as a '310') being completed by the officer to enable the full record to be updated.

2.5.3.2 However, officers reported that many 310's are getting lost and they are being chased for the information for the PNC. This information is vital if the Force is to use the PNC to its full potential, for example using the enhanced search facilities such as QUEST. It is therefore possible that investigations are being hampered by the delays in capturing adequate data on the system. Furthermore, the frequency of the problem has resulted in many officers making multiple copies of the 310 prior to putting them in the post, so that they have the form readily available upon request. This is clearly adding an additional and unnecessary administrative burden on officers.

2.5.3.3 In addition the Force has no process to capture offences which are reported for summons, until the summons itself is issued. This can take up to 2 weeks from the commencement of proceedings. In September 2005, summons cases accounted for 4.5% of all Humberside's PNC A/S updates and is therefore having an impact on the Force's A/S performance.

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that Humberside Police reviews its processes for capturing non-custody cases on the PNC to assist in the achievement of performance targets and unnecessary burdens are not being placed on police officers and staff.

2.5.4 Compliance with the Code of Practice

2.5.4.1 At the time of the inspection, Humberside Police 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 three of the four force Divisions. This is due to the fact that there are problems with the Force updating such data through an 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.

- 2.5.4.2 HMIC Auditors were encouraged that the Force had plans in place to capture this data and a phased roll out had commenced at the time of the inspection, with one of the three Divisions routinely updating this information on the PNC.

Recommendation 12

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.

- 2.5.5 Ad hoc intelligence updates²

- 2.5.5.1 Humberside Police does not currently have a process for the capture or update of ad-hoc intelligence on the PNC or on the Violent and Sex Offenders Register (ViSOR) system. Intelligence is recorded on the local intelligence system. However, there is no process to identify any data that is applicable to the PNC and or ViSOR and arrange for the subsequent updating of the appropriate record. The Force is not therefore fulfilling its obligation to ensure that all PNC and ViSOR records are kept complete, accurate and up to date which is of particular concern as some of these records may relate to the most serious offenders.

Recommendation 13

Her Majesty's Inspector of Constabulary recommends that the Force expands the process for capturing intelligence to guarantee that information applicable to PNC and or 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.

2.5.6 Data quality

2.5.6.1 HMIC Auditors conducted reality checks at Humberside to determine the quality of data being supplied by officers and subsequently input to PNC. This was achieved by obtaining 20 source input documents (form 310), reviewing their content and comparing the details submitted to the PNC record. HMIC Auditors were pleased to note that the information the officers were supplying was complete and often included details such as occupation and habitual dress. In addition, the Force updates all remand histories and adjournments on the system, which is accepted best practice.

2.5.6.2 However, some concerns were raised with regard to data quality. First, in half the 310s submitted by officers, the offence location had not been captured. This is important intelligence and is information which can be searched against in subsequent investigations.

2.5.6.3 HMIC Auditors also reviewed all the cases of rape against a female over the age of 16 which had been created by Humberside Police. It was of concern to note that in three of the five cases reviewed modus operandi keywords had not been updated on the PNC. 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, during a police investigation. 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.

Recommendation 14

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

2.5.7 Warrants management

2.5.7.1 Warrants management is the responsibility of the local warrants officers who are based at each of Humberside Police's divisions. The warrants officers are responsible for managing the physical warrants (i.e. the paperwork) and for notifying the PNC Bureau of any which require circulating on the PNC and for the cancellation of existing warrants on the system.

2.5.7.2 Humberside Police has a policy in place outlining the procedures in relation to warrants and the roles and responsibilities of everyone involved in the process. However, during interviews and focus groups HMIC Auditors became aware of confusion among police officers of the procedures to be applied when the local warrants officer is unavailable, e.g. out of office hours or when they are on annual leave. There is therefore a risk that procedures are not being complied with and vital PNC updates are being delayed/ omitted.

Recommendation 15

Her Majesty's Inspector of Constabulary recommends that the Force clearly communicates to officers the procedures to be applied in relation to warrants when a warrants officer is not available.

2.5.8 Password resets

- 2.5.8.1 As with the majority of computer systems, users require a user id and a password in order to gain access to the system. Management of this for the PNC is the responsibility of the PNCB. As the system administrator the PNCB is able 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 16

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 September 2005, Humberside input 83.5% of Arrest/ Summons (A/S) updates on PNC within 24 hours. This shows a slight improvement in performance in the 12 months to September 2005 from 78.7% in October 2004. It should be noted that the force has not achieved the target of 90% in any of the 12 months to September 2005. 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 the Force has a backlog of updates to PNC (up to 2 months in some Divisions). HMIC Auditors believe that the previous ACPO PNC Compliance Strategy target of 5 days is a guide to satisfy the legislation.
- 2.6.2 Humberside's performance in terms of court results has shown improvement against the Code of Practice target. In October 2004 the Force entered 77.3% of results within 7 days of the court date. This has increased to 82.0% being entered within 10 days in September 2005. The Force has consistently achieved the performance target as set out in the Code of Practice for PNC.
- 2.6.3 Finally, with regard to outstanding prosecutions on the PNC in the 12 months to September 2005 the Force has shown an overall decrease of 6%. 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 Humberside's case, this accounts for approximately 14% 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 HUMBERSIDE**Recommendation 1**

Her Majesty's Inspector of Constabulary recommends that the Force include a representative from the communications environment to attend the Steering Group and urges divisional representation to attend the meeting on a regular basis.

Recommendation 2

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

- Enhances its current management information on data timeliness to include data quality and;
- Implements a process for the prompt identification of cases which have failed to transmit from NSPIS Custody to PNC.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that Humberside:

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

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that the Force reviews its transaction monitoring procedures to detect misuse and or abuse of the PNC.

Recommendation 5

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

- Ensures that sufficient data protection auditing is undertaken of the PNC;
- Introduces a mechanism to ensure the implementation of the data protection recommendations forcewide.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that the Force considers the introduction of a PNC capacity within the PSD environment.

Recommendation 7

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 8

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

- Considers options available to provide resilience to the current PNC training arrangements to ensure that training needs can be met;
- Reviews its process for prioritisation of places for courses to ensure that those who require PNC in exercise of their daily duties receive training at the earliest opportunity;
- 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 9

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 timely, and that the Force complies with the Code of Practice.

Recommendation 10

Her Majesty's Inspector of Constabulary recommends that the Force reviews the processes and resources in place for the update of NSPIS in the custody suites to ensure that the efficiency and effectiveness of updates can be improved and sustained.

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that Humberside Police reviews its processes for capturing non-custody cases on the PNC to assist in the achievement of performance targets and unnecessary burdens are not being placed on police officers and staff.

Recommendation 12

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 13

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

Recommendation 14

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

Recommendation 15

Her Majesty's Inspector of Constabulary recommends that the Force clearly communicates to officers the procedures to be applied in relation to warrants when a warrants officer is not available.

Recommendation 16

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 HUMBERSIDE

- The production and circulation of management information at Divisional level on the timeliness of the submission of the arrest summons data.
- The dip sampling of PNC updates that are undertaken and recorded by the supervisors within the AJUs to check the quality of the work of the staff.
- The production of a PNC policy strategy document and the strategic action plan monitored by the PNC Steering Group.
- The independence of the Professional Standards Department.

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.