



METROPOLITAN POLICE SERVICE

14 – 18 FEBRUARY 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 the Metropolitan Police Service (MPS) between 14th and 18th February 2005.
- 1.1.2 The MPS was subject to a PNC Compliance Audit using the April 2003 Protocols on PNC Compliance. Her Majesty's Inspector would like to acknowledge the enthusiasm of the Force and also to place on record his thanks to all members of staff who contributed to this report and provided assistance during the inspection.
- 1.1.3 This report is based on views and comments obtained from strategic, PNC and customer level management and users at Force Headquarters and at 8 of the 32 Borough Command Units (referred to as 'BOCUs'). 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 The MPS is the largest and most complex police organisation in England and Wales. It consists of 32 borough-based operational command units (BOCUs), sharing coterminous boundaries with the London boroughs. It is responsible for policing 620 square miles, with a resident population of around 7.2 million. It also deals with an additional daily influx of approximately 5 ½ million visitors and workers. The MPS is one of the largest public sector organisations in the country and is configured to deliver a range of international, national and pan-London services, as well as local service delivery across the 32 territorial boroughs. Additionally, the MPS is routinely required to respond to a range of major and critical incidents and events characterised by an ongoing commitment to provide reassurance to the people of London against the backdrop of a heightened terrorist threat.
- 1.2.2 The Force is headed by the Management Board comprising the Commissioner, Deputy Commissioner, five Assistant Commissioners and four Directors. In terms of staff numbers the MPS is around three times larger than the next largest force. The force employs 30,235 police officers, 11,996 police staff and 1392 Police Community Support Officers. About 10% of the MPS's most specialised and experienced officers are assigned to the security and protection commands whose key role is to protect London's residents, the business and diplomatic communities, the Royal Family and the seat of Government from terrorist threat. The Force headquarters is based at New Scotland Yard in Central London.
- 1.2.3 The PNC Bureau (PNCB) is located at New Scotland Yard and comprises 132 police officer and staff. It operates on a 24/7 basis and is responsible for updating Arrest/Summons reports, disposals, wanted/missing reports, disqualified drivers and court disposals. The PNCB also provides specialist PNC services to the Force such as Vehicle On-Line Descriptive Searches (VODS) and Queries Using Extended Search Techniques (QUEST). It also provides other services to the

Force including Wards of Court and provides an out of hours helpdesk service for the Missing Person's IT system, Merlin.

- 1.2.4 The creation of Arrest/ Summons records at the MPS is a manual process which requires the arresting officer to telephone the PNCB in order to provide skeleton¹ record details and obtain an Arrest/Summons number. The full record is then updated by the PNCB upon receipt of a Source Input Document (known locally as the 'PNCB Form') from the arresting officer.
- 1.2.5 Court results are updated by the Court Results Team within the PNCB. This team is split into two shifts which combined provide cover from 7am to 8pm Monday to Friday. Magistrates court results from central and northeast London are received via a system known as Porteus which links to the courts' own Equis system. Results from the remaining magistrates courts are sent to the Borough Criminal Justice Units (CJUs) who complete a separate PNCB10 form for each which is sent to the PNCB for update on PNC. Further discussion of these two processes can be seen at paragraph 2.4.1 of this report.
- 1.2.6 Crown Court results are received by the PNCB through the mail directly from the court. The Court Results Team also input court bail conditions on the PNC. Breaches are input by the Monitoring Section within the PNCB. The Court Results Team only updates cases which originated in the MPS. Court results in relation to cases which originated in other forces or Non Police Prosecuting Agencies are not routinely updated on the PNC by the MPS due to the difficulty in identifying such cases on the Porteus system.

1.3 Methodology

- 1.3.1 A full inspection against the 2003 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 This is used to describe those Arrest/ Summons reports that only contain the minimum amount of information that is required to register the record on the system.

- 1.3.3 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, a “walk through” of processes within the PNCB 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 will be increased to 75% on 1 July 2005, six months after the

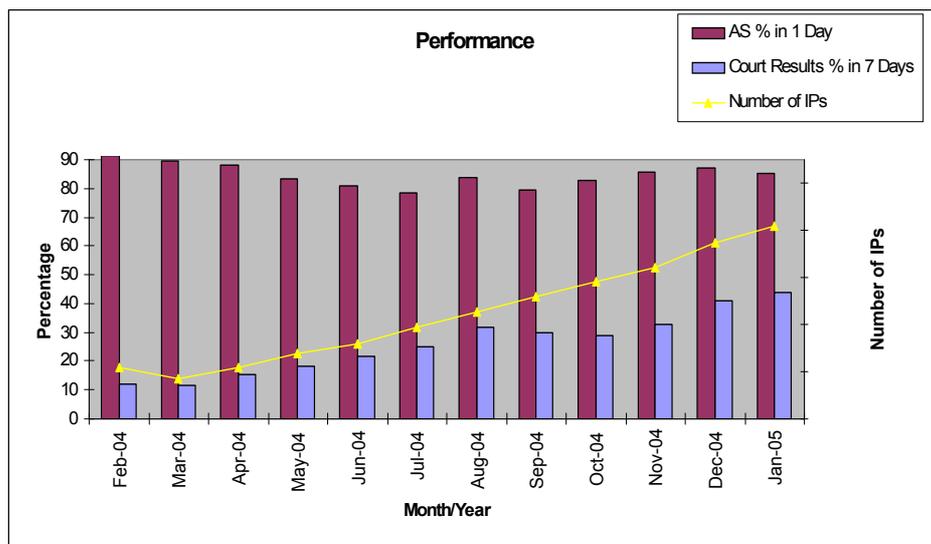
commencement of the Code. (Courts have their own target of 3 days for delivery of data to the police. Therefore, the police are measured against an overall target of 10 days.)

1.4.4 In January 2005 the MPS entered 87.8% of Arrest/ Summons (A/S) reports within the 24 hour target. Over the last 12 months the Force has shown a deterioration against this PI although it continues to perform better than the English national average of 83.8%. The number of days taken by the Force to enter the quickest number of A/S reports has also fallen over the same period from 1 day in February 2004 to 4 days in January 2005 although this is again better than the national average of 10 days.

1.4.5 The MPS's performance in terms of court results, as displayed in the PITO statistics, has improved over the last year. In February 2004, the Force input 12.2% of results within 7 days of the court date. This improved to 43.8% being updated within 10 days of the court date in January 2005 although this is still below the England and Wales national average of 62.4% in the same month. The number of days to input 90% of court results has also improved over the last year. In February 2004 the Force was taking 250 days to input 90% of its results, improving to 90 days in January 2005. However, this is still below and undoubtedly skewing the national average of 61 days for January 2005.

1.4.6 In terms of Impending Prosecutions (IPs) the MPS has shown an increase of 53.67% in the 12 months to January 2005. This is compared with an increase in Arrest/Summons reports created in the same period of 67.64%. Therefore, HMIC Auditors are satisfied that the MPS is managing its outstanding impending prosecution records on the PNC.

1.4.7 A graph illustrating the Metropolitan Police Service's performance in the 12 months to January 2005 is shown below:



1.5 Conclusions

- 1.5.1 HMIC's assessment of PNC compliance within the Force has been assessed as:
- Poor** – No or limited evidence of activity against all the protocol areas, or serious concerns in one or more area of activity.
- 1.5.2 This assessment is based on the detailed findings of the report which highlight serious concerns in several areas of activity. These issues have culminated in poor quality data being entered on the PNC (see paragraph 3.1.1) and a deterioration in performance in terms of Arrest/Summons entry over the last 12 months. Court results have, however, seen significant improvements from a very low base.
- 1.5.3 The report has been divided into sections for ease of reference. Section 2 of the report covers Strategic Findings and Recommendations. Section 3 relates to Tactical Findings and Recommendations. Section 4 contains Operational Findings and Recommendations for the PNC Bureau.
- 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. Strategic Findings and Recommendations

2.1 Leadership

2.1.1 Process Ownership

2.1.1.1 At the time of the inspection, several individuals and departments could be defined as process owners for PNC. This fragmented ownership can be attributed to the fact that different areas perform and therefore own different parts of the process. For example, the PNCB update all Arrest/ Summons (A/S) and court result records whilst all the data for the A/S reports and some of that for the court results (i.e. non-Porteus data) is received from the boroughs. Therefore, whilst the PNCB is within the Assistant Commissioner Specialist Crime portfolio, the data upon which it relies is driven by the Territorial Policing (TP) portfolio.

2.1.1.2 In addition, HMIC Auditors were made aware that the Force is undertaking a project to implement the National Strategy for Police Information Systems (NSPIS) custody and case preparation applications which have been piloted at one of the thirty-two boroughs. This system should allow for the automatic update of A/S reports on the PNC from the boroughs with minimum intervention by the PNCB. This project is being implemented within the TP portfolio.

2.1.1.3 The result of the process split between portfolios is that responsibility for performance is unclear since it is measured against a department (i.e. the PNCB) which has no control over the provider of the data (i.e. TP). Furthermore, in the 12months to January 2005 the PNCB has seen an increase in the volume of A/S input by almost 68% but has not been provided with any additional resources to enable it to manage performance.

Recommendation 1

Her Majesty's Chief Inspector of Constabulary recommends that the Force ensures that the current division of management and responsibility for the PNC is providing optimal performance and that there is in place clear lines of accountability and processes to match resources to the demand/ workload.

2.1.2 PNC Strategic Committee

2.1.2.1 In preparation for the inspection, HMIC Auditors were provided with the minutes of the most recent meeting of the Force's PNC Strategic Committee (September 2004). The Committee plans to meet quarterly and is chaired by the Deputy Assistant Commissioner Specialist Crime. This committee is supported by a sub-group, the PNC Working Committee, which is chaired by a Commander in Specialist Crime, who also attends the Strategic Committee.

2.1.2.2 A number of earlier reports by Her Majesty's Inspector of Constabulary, including the thematic report 'On The Record' highlighted the crucial role of chief officer involvement on PNC Steering Groups. This was, in fact, one of the few areas of consistency in forces who were seen as performing well in earlier inspections and its importance cannot be over-emphasised.

2.1.2.3 HMIC Auditors are aware of a number of forces throughout England and Wales where a similar structure of sub groups is employed to implement the strategic decisions from the Strategic Group. A PNC Working Group also assists with the dissemination of any changes made to the PNC, communicates Strategic Group decisions and passes items to the Strategic Group for discussion at the appropriate level. The MPS is encouraged to ensure that the PNC Working Group encompasses all these responsibilities.

2.1.2.4 HMIC Auditors view the PNC meeting structure in a positive light. However, the inspection also highlighted the fact that the Strategic Committee had been disbanded between 2002 and September 2004 and at the time of inspection was without an ACPO lead due to officer secondments to the Tsunami Project. The Strategic Committee is essential to ensure that the Force is able to devise long term strategic objectives for its use of the PNC and to provide a forum to discuss and action any performance issues with the appropriate level of management.

Recommendation 2

Her Majesty's Chief Inspector of Constabulary recommends that the Force ensure that the reinvigorated PNC Strategic Committee continue to meet and be chaired by a chief officer rank.

2.2 Policy & Strategy

2.2.1 PNC Strategy

2.2.1.1 At the time of the inspection the MPS had no written strategy for PNC either in the form of a document or a strategic action plan to define the Force's long term objectives for PNC use and how these objectives will assist in achieving wider organisational goals.

2.2.1.2 A formalised strategy document or strategic action plan, outlining roles and responsibilities and covering topics such as marketing and awareness, Training and PNC Security, would provide a framework to assist the Force in improving the efficiency and effectiveness of PNC usage. The document should cover the recommendations of this report and all previous HMIC reports where no progress has been made. A strategic action plan should contain specific objectives, to be attained within certain timescales and ownership of issues to be attributable to specific job roles. Such documents would also ensure the Force allocates 'ownership' of issues to individuals or departments to generate a proactive approach to PNC. Importantly, it would ensure that the Force is getting an optimal return on its investment in the system.

Recommendation 3

Her Majesty's Chief Inspector of Constabulary recommends that the MPS formally documents a strategy for PNC.

2.2.2 PNC Policy

2.2.2.1 In addition to the lack of a written strategy, HMIC Auditors found an absence of forcewide policies for PNC usage. Detailed policy documents were provided for the operation of the PNCB and the Force is commended for its work in this area. However, policies are required to cover all individuals and departments who supply data for the PNC or who use the information which the system holds.

2.2.2.2 It is important that the responsibilities of all people, whether they are using PNC for themselves in fulfilment of their duties or on behalf of somebody else, are clearly defined and also any sanctions that exist for non-compliance to the policy. A publicised and enforceable policy will hold staff truly accountable for their actions or inactions and will also raise PNC awareness.

Recommendation 4

Her Majesty's Chief Inspector of Constabulary recommends that the Force develop and publicise suitable policies endorsed by Chief Officers for the management of PNC. The policies should outline the role and responsibilities of staff across the organisation relating to the use of PNC and include details of the implications of non-compliance.

2.3 People**2.3.1 PNC Training**

2.3.1.1 HMIC Auditors reviewed the training provision for officers and staff who have access to the system via mobile data terminals (MDTs) and via a local MPS system known as AWARE. Areas of concern were identified during the inspection and these are discussed in further detail below.

2.3.1.2 At the time of the inspection, training of PNC via MDT had been suspended pending a review of the training process for this equipment. During interviews and focus groups, HMIC Auditors learned that officers who had access to MDTs may have either received a one-day training course, as approved by the MPS Management Board, or alternatively been trained via a computer based training package. Upon completion of either of these training methods, the officer was given access to perform PNC names and vehicle checks.

2.3.1.3 It is the opinion of HMIC Auditors that both of these training packages are insufficient to enable officers to fully comprehend and interpret the data supplied via MDT so that they can take appropriate action. HMIC would refer the Force to the national PNC training guidance issued by Centrex which provides for a 4 days course on Names Enquiry. The Force is at risk of missed opportunities for arrests or of arresting individuals unlawfully due to misinterpretation of data.

Recommendation 5

Her Majesty's Chief Inspector of Constabulary recommends that the Force review its MDT training provision to ensure that it fulfils the national requirements for PNC training.

2.3.1.4 Training for the use of PNC via AWARE is delivered at the MPS both by the Central Training School at Hendon and also by trainers based at the boroughs. HMIC Auditors were satisfied that the training provision at Hendon meets national standards.

- 2.3.1.5 However, with regard to borough AWARE training, HMIC Auditors are concerned by the variation in the standards of training provided. In particular, it was noted that the length of courses and the assessment of those receiving the training varied greatly between the boroughs. Courses ranged from twenty minutes to four days to cover the names and vehicle applications. Assessments could require a mark of 70% to pass or could be at the discretion of the trainer.
- 2.3.1.6 This differential can be attributed to the fact that the borough trainers are not Centrex accredited PNC trainers. The MPS would argue that they have received a dispensation from Centrex to provide training in this manner. However, there appears to be no audit trail for this relaxation. Furthermore, HMIC Auditors noted a degree of tension between the MPS Central Training School and the borough trainers which is affecting communication between the two with the result that the borough trainers are potentially not fully informed about changes to the PNC. These issues all lead toward a situation where officers are not being fully trained on how to interpret the results they extract from PNC, the implications of which are self-evident.

Recommendation 6

Her Majesty's Chief Inspector of Constabulary recommends that the Force urgently reviews the provision of borough training for accessing PNC through AWARE. Consideration should be given to suspending borough based training until this review is complete.

2.4 Processes**2.4.1 Update of court results**

- 2.4.1.1 Court results are updated by the PNCB located at New Scotland Yard. Currently, there are two ways in which magistrates courts results are received by the PNCB. For the Inner and North East London magistrates and youth courts, results are received electronically through a system known as Porteus, which links to the magistrates courts' Equis system. This system enables PNCB to obtain the information as soon as the courts have validated their own systems. This has led to the Force's improved performance over the last 12 months for its timeliness of results update on the PNC. For all other London magistrates courts, the borough Criminal Justice Units (CJUs) have access to their local courts' Equis information which is used to complete a manual PNCB10 form and then posted via internal mail to the PNCB for update on PNC. In addition to issues surrounding this procedure discussed later at paragraph 3.5.2, this process clearly builds in delays of up to a week between the Force receiving the information and the PNC being updated.

- 2.4.1.2 The Force is currently reviewing the possibility of expanding the PORTEUS system to include the results of all London's magistrates courts and HMIC would urge the Force to progress this work.

2.5 Results

- 2.5.1 During the twelve months to January 2005, the MPS has experienced varying results in its performance of entering Arrest/Summons information on the PNC. In February 2004, the Force was achieving 91.2% of records being entered within 24 hours. This performance dropped to 78.6% in July 2004 but has steadily improved to 87.8% of records being entered within 24 hours in January 2005.
- 2.5.2 Whilst this improvement is encouraging and performance is better than the England and Wales national average of 83.8%, in January 2005, the Force failed to achieve the 90% target as enshrined in the PNC Codes of Practice. In addition, the Force took longer to input 90% of its Arrest/Summons in January 2005 (4 days) than it took in February the previous year (1 day). Whilst the Force's performance in this respect was again better than the national average of 10 days, the deterioration is of concern.
- 2.5.3 In terms of court results, the MPS has consistently been below the national average for the percentage of cases entered within 10 days of the court date. January 2005 shows the highest recorded figure against a target of 50% of records within 10 days when 43.8% were updated within the target time. The improvement is as a direct result of the implementation of the Porteus system which enables the Force to receive disposal data from Inner London courts electronically. The national average in January 2005, for comparison, was 62.4% of results recorded within 10 days. The MPS took 90 days to input 90% of its court results in January 2005 which is also performing below the national average of 61 days. HMIC Auditors are of the opinion that the Force will struggle to meet the revised target of 75% of court results being entered within 7 days of receipt from 1st July 2005 unless immediate action is taken to improve its processes in this area. In particular the Force would benefit from working towards more electronic solutions to overcome the problems posed by manual processes, discussed in paragraph 2.4.1.1.
- 2.5.4 In terms of outstanding prosecutions, HMIC Auditors are satisfied that the MPS is managing this aspect of PNC data. The Force has experienced an increase in Arrest/Summons reports created in the 12 months to January 2005 of 67.6%. The increase in A/S reports can be attributed to the Force compliance with the 2003 Criminal Justice Act. In comparison, the number of impending prosecutions has only increased by 52.7% in the same period. Therefore, the force is not allowing the spiralling volume of A/S reports to sit unresolved on the PNC.
- 2.5.5 The recommendations of this report aim to assist the Force in improving its PNC performance in terms of both data quality and timeliness. It should be read in conjunction with previous HMIC Reports and the Force will need to urgently develop action plans to address the issues it faces if it is to improve its HMIC assessment grading in the future.

3. Tactical Findings and Recommendations

3.1 Leadership

3.1.1 Responsibility and Accountability

3.1.1.1 HMIC Auditors reviewed the Force's procedures for holding both the boroughs and individual officers accountable for the quality and timeliness of information supplied for input to PNC. It was disappointing to note that at the time of the inspection there was no performance monitoring at either a borough or individual officer level.

3.1.1.2 During the inspection, HMIC Auditors conducted reality checks to ascertain the quality and timeliness of the source information provided by officers to the PNCB. A total of 147 PNCB forms were reviewed in this exercise. In addition, HMIC Auditors obtained 24 records from the Force's custody system to determine whether PNCB forms had been subsequently submitted by officers in all cases. The results showed that of the 147 records checked, only in 7 (5%) of cases had an officer submitted a complete set of PNCB forms for the system to be updated.

3.1.1.3 Of the records from the custody system, 9 of the 24 (38%) records were still skeleton records on the PNC, showing that no PNCB Forms had been submitted in these cases, each of which were 1 week old. Due to the time constraints of the inspection, HMIC Auditors were unable to verify whether this information may have been submitted at a later date or was never submitted for input to PNC.

3.1.1.4 Without performance information to identify and hold accountable those boroughs or officers providing incomplete, inaccurate or late information for submission to the PNC, it will be difficult for the Force to improve its performance in terms of the quality or timeliness of data submission. Borough Commanders should play an active role in improving the quality and timeliness of data submitted for update to PNC. The provision of quality assurance and performance management information to Borough Commanders will enable them to take appropriate action against officers who persistently fail in this area. In addition, such performance monitoring would enable the Force to identify trends and thus potential training needs for its officers.

Recommendation 7

Her Majesty's Chief Inspector of Constabulary recommends that the Force urgently develop quality and timeliness performance management information at an individual and borough level.

3.2 Policy & Strategy

3.2.1 PNC Security

3.2.1.1 In terms of security of the PNC, HMIC Auditors reviewed five key areas worthy of note: User access; Data Protection Auditing; Data Protection and Information Security Training; Transaction Monitoring; and Data Protection breaches. Each of these areas is discussed in further detail below.

3.2.1.2 Responsibility for the management of user access to the PNC rests with several individuals and departments across the MPS. This can be attributed to the fact that the PNC can be accessed via several methods. For example, officers are able to access the PNC for enquiries via a system known locally as AWARE. Each borough has its own AWARE administrator who is able to create, amend and delete users from the system. The PNCB has its own trainers, who are also able to create, amend and delete direct connect terminal users from the PNC. These are just two examples of system administrators within the Force.

3.2.1.3 As a result, the MPS was unable to inform HMIC Auditors of the number of users, or of each user's level of access to the PNC. Furthermore, the Force has not independently audited the function being carried out by those able to set up and amend user access, nor of the number of PNC users. HMIC Auditors believe that the number of people able to set up and amend user access should be restricted to a manageable number in order for the integrity of the system to be maintained and that this function should be independently audited, at least annually.

3.2.1.4 Currently the Force is exposed to the risk of users being provided with access to the system who have not received appropriate training or who are given access to parts of the system for which they have not received training. There is also the danger of redundant accounts being left on the system or, more alarmingly, of fraudulent accounts being created. This approach is contrary to the principles of the PNC Code of Connection and the PNC Manual:

It is essential that all personnel having contact with PNC facilities must be trained to the correct standard by trainers who have themselves been fully accredited by Centrex.²

Recommendation 8

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

- i) Conducts a review of PNC systems administrators and reduces the number of people able to create, amend and delete users.**
- ii) Introduces an independent process to audit PNC users which should be conducted at least annually.**

² Extract from Section 5 (Training) of Volume 1 of the PNC Manual, version 4.01, March 2004.

- 3.2.1.5 The Information Compliance Unit within the MPS performs an annual risk assessment of its IT data systems in order to produce an Audit Plan in accordance with the guidance contained in the ACPO Data Protection Audit Manual. The Unit has five inspectors who conduct systems security auditing for the Force. Eleven PNC applications have been identified to be included in the audit plan. However, the Unit performs only two audits per annum on PNC applications which HMIC Auditors believe is insufficient to maintain the integrity of the system. Furthermore, there is no process for the follow up of recommendations for improvements with the result that no assurances could be provided to HMIC that appropriate action is taken as a result of the audit work undertaken. In the current climate post Bichard Inquiry, it is imperative that forces ensure that data protection issues identified are rectified as a matter of priority.

Recommendation 9

Her Majesty's Chief Inspector of Constabulary recommends that:

- i) The MPS reviews its audit resources to ensure that sufficient auditing is carried out across all its data systems.**
- ii) Reporting and ownership processes are reviewed to ensure that issues identified as a result of audits are rectified in a timely manner.**

- 3.2.1.6 In terms of Data Protection and Information Security training the MPS holds a session covering these important issues as part of its student officer training at Hendon. However, at the time of the inspection no such training was provided for police staff, albeit, this was planned but with no firm start date. HMIC Auditors would encourage the implementation of such training for all police officers and staff to ensure that everyone is aware of their personal responsibilities for maintaining system and data security.

Recommendation 10

Her Majesty's Chief Inspector of Constabulary recommends that the MPS introduce Data Protection and Information Security training for all police officers and staff.

- 3.2.1.7 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 the MPS each borough and department is responsible for performing its own monitoring and escalating any issues identified to the Information Compliance Unit or the Directorate of Professional Standards. However, interviews and focus groups revealed that such monitoring is not taking place. This is totally unacceptable.
- 3.2.1.8 In addition, it is questionable whether this activity, even if it were being undertaken, being performed by the boroughs and departments could be regarded as wholly independent as ownership of this process should rest with a department which is independent of operational PNC activity. Furthermore, any transaction monitoring process would be more robust if supported by proactive analysis of transactions to identify trends which may suggest improper use of the PNC.

Recommendation 11

Her Majesty's Chief Inspector of Constabulary recommends that the policy for transaction monitoring and analysis is reviewed in order to implement a robust and effective process.

- 3.2.1.9 Finally with regard to PNC security, from anecdotal accounts provided during interviews and focus groups, it appears that the MPS is at risk of providing PNC information to non-authorised individuals. This, it is claimed, is due to the fact that the Force's borough control rooms (known locally as Computer Aided Despatch or CAD) perform radio and telephone PNC checks for MPS officers. However, during periods of high demand, an officer is able to request a check from any CAD and it is claimed that CAD operators do not always follow procedures to ensure that the officer and request are genuine. At the time of the inspection, the Force was undergoing a major change programme to move away from borough control rooms to a more centralised approach. This is therefore an ideal time to review the procedures in place and to make the changes to ensure security of all police information.

Recommendation 12

Her Majesty's Chief Inspector of Constabulary recommends that the MPS reviews its procedures, as part of the control room change programme, to ensure that police information is only supplied to authorised individuals.

3.3 People

3.3.1 Marketing and Awareness

3.3.1.1 The level of awareness of PNC functionality varied throughout the Force. Some officers were aware of the Vehicle On-line Descriptive Search (VODS) but there was little knowledge of Queries Using Extended Search Techniques (QUEST) and many officers and staff were unaware as to which departments and individuals are able to conduct complex searches. Furthermore, knowledge of the restrictions on the use of certain data held by the PNC, such as driving licence and insurance details, was also limited. There is therefore the risk that such data is being used inappropriately or unlawfully by MPS officers.

3.3.1.2 A focused marketing campaign should be conducted to raise the profile of PNC and the level of awareness of its functionality. This should be developed as part of a marketing strategy owned by the Force PNC Steering Committee, using expert resources which may be available from within the Force or from organisations such as PITO (Police Information Technology Organisation). Boroughs have regular training days and it is the opinion of HMIC Auditors that a day allocated to services that exist to assist operational policing, including PNC complex searches, would provide significant benefits to all operational staff.

Recommendation 13

Her Majesty's Chief Inspector of Constabulary recommends that:

- i) A Marketing Strategy be developed, published and implemented to raise awareness for the effective use of PNC across the Force.**
- ii) The Force includes PNC within the Borough Training Days programme of events.**

3.4 Partnerships & Resources

3.4.1 Relationships with the Courts

3.4.1.1 Overall, this is an area in which the MPS has made good progress. Of particular note is the relationship which has been developed with the local courts through the introduction of the Courts User Group and the Force's attendance at the Greater London Magistrates Court Authority meetings. This has resulted in the introduction of the Porteus system which allows the Force to obtain electronically the magistrates court results from Central and Northern London directly from the courts' Equis system.

3.4.2 Relationships with Non Police Prosecuting Agencies (NPPAs)

3.4.2.1 With regards to NPPAs the Force is yet to develop relationships that will enable improved performance in the submission of the source documentation from NPPAs. Currently, the Force becomes aware of the majority of non police prosecutions when they appear on the court register, updating them on a 'come to notice' basis. The Force has developed a service level agreement (SLA) with the RSPCA. HMIC Auditors would encourage an extension of this for all NPPAs that prosecute in the Force area. Experience from other Force's suggests that such action will improve the timeliness of input of non police prosecutions.

3.5 Processes

3.5.1 Input of Arrest/ Summons Reports

3.5.1.1 Arrest/ Summons (A/S) reports are created and updated by the PNCB, based at New Scotland Yard. The force procedure is that the arresting officer telephones the PNCB to provide skeleton record details and obtains an A/S number. Subsequently, the arresting officer should provide the PNCB with a manual form which contains the detail required to update the full PNC record. During focus groups and reality checks, HMIC Auditors noted a number of concerns with the current procedures.

3.5.1.2 Firstly, at each of the boroughs visited HMIC Auditors were informed that there is often a long delay before the PNCB answer the telephone. There were reports that this can take as long as 40 minutes. This is partly due to the resource issues discussed earlier in paragraph 2.1.1 of this report which have resulted in staff covering for other teams within the PNCB. As the A/S number is required to enable fingerprints to be processed through the Livescan system, this is building unnecessary delays into the custody process and results in officers being held up in the custody suites for long periods of time.

3.5.1.3 Secondly, there is inconsistency between the boroughs in terms of how officers obtain the manual PNCB forms. In some boroughs officers access these from the Intranet, whilst in other boroughs a store of PNCB forms has to be kept in the custody suites. When officers experience difficulties in obtaining the forms it was reported that they may complete them at a later time away from the custody area or may simply neglect to provide the PNCB with the information required at all rather than be held up any longer in the custody suite. This verbal evidence was supported by reality checks which showed eight out of twenty-four A/S records on the PNC containing only skeleton data as no PNCB form had been received (an error rate of 33%). The missing information is important for the purpose of conducting effective QUEST searches on the PNC.

Recommendation 14**Her Majesty's Chief Inspector of Constabulary recommends that:**

- i) The Force reviews its PNCB resources to ensure that it is able to meet demand.**
- ii) The Force ensures that all officers are made aware of how PNCB forms can be easily accessed and ensures that the forms are completed in all cases.**

3.5.2 Input of Court Results

3.5.2.1 Court result data is also updated by the PNCB. There are a variety of ways that this information may be received. Inner London magistrates court results are received via the Porteus system, as described earlier. Alternatively, the courts send a copy of the court register to the MPS borough Criminal Justice Unit (CJU). CJU staff then informs the PNCB via a PNCB10 form for each result of the update required on PNC. The issues identified by HMIC Auditors are as follows:

3.5.2.2 There is no enforcement of the procedure required of CJUs to supply information to the PNCB. As a result, the PNCB will accept any form of notification of a disposal, not necessarily a PNCB10. This lack of corporacy exposes the Force to the risk of incorrect or incomplete data being recorded on the PNC and previous convictions being incorrectly recorded – possibly against an innocent individual.

3.5.2.3 The introduction of the Porteus system for the Inner London courts has undoubtedly improved the MPS's performance in terms of its overall timeliness figures for disposals. The improvements can be seen in the 12 months to January 2005, as described earlier in this report. However, the manual process for the remaining courts will continue to prevent the Force from achieving its targets until a pan-London IT solution is in place, or until the existing processes are reengineered to remove their inefficiency.

- 3.5.2.4 The procedures employed within the PNCB court results team vary depending on the shift. For example, the court results team will take the overflow telephone calls from officers for the input of A/S skeleton records and on another shift there is a nominated person for this task whilst on yet another shift anyone can perform this task. Another example is in relation to the quality checking performed of the inputters work. On one shift staff are given a percentage of error margin whilst staff on the alternate shift are all permitted the same absolute number of errors regardless of the volumes they input. Poor performance may be either discussed with the individual or may be posted on the notice board, again dependent upon which shift the staff member is part of.
- 3.5.2.5 The Force would benefit from reviewing its internal procedures within New Scotland Yard to improve the timeliness of its disposals on PNC. In particular, the flow of court result documents should be reviewed to ensure that their input to PNC is a priority since under current procedures, the documents pass through several hands on their journey between the Main Post Room at NSY and the PNCB court results input team. This may result in a delay of several days.
- 3.5.2.6 Finally, HMIC Auditors noted a number of updates which should be performed on the PNC which the MPS were not inputting. Due to the reported resource issues discussed several times in this report, there was a backlog of disposal updates referred to locally as “secondary updates”. These include remands, court bail conditions and breaches. The Force was unable to provide any assurance that this backlog (around 6 months of data) could be cleared at current staffing levels. Also, MPS were not updating disposal data for cases which originated in another force area. This is contrary to national guidance, as provided in the PNC Manual.

Recommendation 15

Her Majesty’s Chief Inspector of Constabulary recommends that the MPS:

- i) Reviews, and where necessary amends, its internal procedures for the receipt and update of court results to ensure that inefficiencies in the process are removed.**
- ii) Commences updating all court disposals, regardless of their origin, with immediate effect.**
- iii) Reviews its PNCB resources and internal procedures to tackle the backlog of secondary updates.**

3.5.3 Availability of PNC Checks

3.5.3.1 All PNC radio traffic and the majority of telephone enquiries are directed to the Force's CAD Rooms which are, on the whole, located on the boroughs. Operational staff reported varying levels of service availability. In some cases, an officer may have to wait several minutes in a radio queue before obtaining a PNC check on a vehicle or person.

3.5.3.2 Many officers in the MPS also have the ability to perform their own PNC checks, either via a Mobile Data Terminal or on a desktop computer via the AWARE system. Officers viewed the introduction of these two systems as a positive step. However, at the time of the inspection, both systems were very slow with the result that officers perceived that they crash frequently. Officers were therefore reverting to the traditional radio and telephone checks to overcome this, thus increasing radio traffic with the consequent delays.

3.5.3.3 In addition to the frustration to officers caused by such delays, the impact of waiting for a PNC check can affect operational policing and officer safety.

Recommendation 16

Her Majesty's Chief Inspector of Constabulary recommends that the MPS ensures that sufficient facilities are in place to enable officers to obtain checks in a timely manner.

3.5.4 Ad hoc intelligence updates³

3.5.4.1 The MPS does not currently have any process for the capture or update of ad-hoc intelligence on the PNC. Intelligence is captured on the local intelligence system. However, there is no process to identify any data that is applicable to the PNC and arrange for the subsequent updating of the appropriate record. During focus groups with operational staff in some boroughs, PNC was perceived to offer less benefit than local systems because intelligence is not recorded. This perception could be changed if officers knew that their information could be used on the national system and a process developed to make the relevant updates.

Recommendation 17

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

³ Information applicable for update to PNC that originates from a source other than the creation of an Arrest/ Summons report.

3.5.5 Update of police bail

- 3.5.5.1 The MPS has a process in place to ensure that cases which are subject to police bail are recorded on the PNC. However, there is no process in place to ensure that any attached pre charge bail conditions are input on the PNC. It is in contravention of the PNC Manual not to input bail conditions on the PNC. It is possible that officers in other forces are checking records on the PNC which do not include the most up to date information which may assist in a custody sergeant's decision-making process.

Recommendation 18

Her Majesty's Chief Inspector of Constabulary recommends that the Force expands its current process for the recording of police bail to include bail conditions to ensure that PNC records are complete, accurate and up to date.

3.5.6 Input of Warning Signals

- 3.5.6.1 Warning Signals exist on the PNC so that officers can be alerted that someone may be of danger to themselves, to the officer or to the public. As such, it is imperative that such information is updated on the PNC.
- 3.5.6.2 In the MPS, there is a page on the PNCB Form for the purpose of updating warning signals. However, HMIC Auditors noted three areas of concern whilst reviewing this process.
- 3.5.6.3 Firstly, a review of the warning signals page of the PNCB forms highlighted that officers are not provided with the 'Self Harm' marker option, a warning signal which has been available on the PNC for 3 years. As a result, the PNC will not show that someone brought into custody may self harm and therefore custody sergeants will not be alerted to this fact if the person is brought into custody on a later occasion.
- 3.5.6.4 Secondly, as discussed earlier in this report, officers do not always submit a PNCB Form when someone is brought into custody with the result that warning signals will not be updated in such cases.
- 3.5.6.5 Finally, the current policy within the PNCB is that operators do not make decisions on whether to add a warning signal and only input such data if it is requested by an officer. Anecdotal evidence of missing warning signals was supported by HMIC's own reality checks of 147 PNC records. These showed 24 records (16%) where the nature of the offence merited a warning signal but this had not been requested by the officer and 4 records (3%) where an officer had requested that a warning signal be applied to the record but this had not been updated by the PNCB.

Recommendation 19

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

- i) Updates the PNCB3 (Warning Signals) form to ensure that all warning signals are included.**
- ii) Instructs PNCB staff to record details of warning signals where the offence provides the justification.**

3.5.7 Warrants Management

3.5.7.1 HMIC Auditors were pleased to note the Force's implementation of a new warrants management system. The introduction of this system has enabled the Force to take a corporate approach to its warrants management. Warrants officers located in the borough CJUs are responsible for maintenance of the system and for notifying the PNCB of warrants which need to be circulated nationally.

3.5.7.2 The current procedure requires the warrants officer to update the local system and to notify the PNCB via telephone or on completion of a PNCB11 form of any warrants to be put on the PNC. HMIC Auditors believe that the Force's warrants management system could be enhanced to enable it to automatically notify the PNCB of any warrants to be circulated nationally. This would streamline the process for the warrants officer and would also allow real-time notification to the PNCB in all cases.

Recommendation 20

Her Majesty's Chief Inspector of Constabulary recommends that the Force review the feasibility of enhancing the current warrants management system to include an option of automatically notifying the PNCB where required.

4. Operational Findings and Recommendations for the PNCB

4.1 People

4.1.1 PNCB Training

4.1.1.1 HMIC Auditors reviewed the training received by PNCB staff. Areas for improvement were identified during the inspection and these are discussed in further detail below.

4.1.1.2 The PNCB has its own trainers who are Centrex accredited to national standards. As such, the PNCB has the ability to provide in-house training for enquiry, update and complex searches. Each new member of staff on joining the PNCB is given full enquiry and update training in their first two weeks of employment. This is followed by a period of mentoring within the bureau. There is no refresher training provided to staff, not even following long periods of absence such as maternity or prolonged sick leave.

4.1.1.3 Following discussions with PNCB staff, HMIC Auditors are of the opinion that whilst the training itself is adequate and in accordance with national standards, the intensity of such training may be overwhelming to new staff. Furthermore, the length and level of mentoring provided is dependent upon which team and, indeed, which shift the new staff member joins. Finally PNCB staff may be unaware of significant changes in the information that is stored within a nominal record as a result of system enhancements. There is therefore the risk that quality of updates on the PNC is inadequate to assist operational policing and does not comply with national guidelines.

Recommendation 21

Her Majesty's Chief Inspector of Constabulary recommends that the Force introduces a formal process of mentoring and regular refresher training for its PNCB staff.

4.2 Processes

4.2.1 Data Quality

4.2.1.1 During the inspection HMIC Auditors conducted a series of reality checks in order to determine the quality of data being input to PNC by the Force. A total of 147 PNC records were checked by obtaining a sample of PNCB forms and comparing the information on them to the PNC record. In addition a sample of 24 records were taken from the Force custody system to determine whether the complete record had been input/ updated on the PNC. The results of these checks are described in further detail below.

4.2.1.2 All of the 147 PNCB Forms checked by HMIC were signed as having been previously been quality checked by PNCB supervisors. However, 100% checked by HMIC had at least one error where the information contained in the PNCB forms differed from the information on the PNC. The most common errors identified were incorrect process stage, incorrect process date, no input of nationality, accent or ethnicity, partial input of post codes for offence locations and offender's home address, incorrect force station codes, incorrect descriptive data entered and alias names not input.

4.2.1.3 In addition, the PNCB were not amending inaccurate information supplied by officers. The most common error found in this regard was where the officer had applied the incorrect process stage (e.g. process showing on PNC as reported when should be showing as arrested).

4.2.1.4 Of the 24 records taken from the custody system, 9 had not yet been fully updated due to information not being received from officers and 2 were for non-recordable offences. Of the 13 remaining records which had been updated, 5 (38%) had PNC input errors. These errors ranged from incorrect spelling of the name on the record to a duplicate record being created for an individual who had an existing PNC record which should have been updated.

4.2.1.5 Regardless of the efforts made to date and following this report, to improve the Force's management of PNC it will ultimately prove futile of the data input is of the unacceptable quality demonstrated by this audit.

Recommendation 22

Her Majesty's Chief Inspector of Constabulary recommends that the PNCB review and improve its quality assurance procedures for input staff to ensure that the integrity of data is assured.

4.2.2 Warrants Management

4.2.2.1 This aspect of the inspection has been previously discussed in section 3.5.7 of this report. In addition to what has been previously said, HMIC Auditors noted a further improvement which could be made to the current processes with regard to warrants.

4.2.2.2 The PNCB receive monthly Daily Activity File (DAF) reports from PITO. One such DAF shows all the Force's outstanding warrants on PNC which are due to be weeded from the system. The Force warrants officers were not aware of the existence of such a report and anecdotal evidence was provided of instances when an outstanding warrant has been weeded without the prior knowledge of the warrants officer. As a result, warrants officers are periodically checking their warrants management system against the PNC and requesting that weeded records be re-circulated. HMIC Auditors believe that the process would be more efficient if warrants officers were supplied with the information contained within the DAF reports and could then prevent outstanding warrants from being weeded inappropriately.

Recommendation 23

Her Majesty's Chief Inspector of Constabulary recommends that the PNCB consider circulating the contents of DAF reports to facilitate better management of warrants on the PNC.

APPENDIX A – SUMMARY OF RECOMMENDATIONS FOR THE MPS**Recommendation 1**

Her Majesty's Chief Inspector of Constabulary recommends that the Force have clear lines of accountability and processes to match resources to the demand/ workload.

Recommendation 2

Her Majesty's Chief Inspector of Constabulary recommends that the Force ensure that the reinvigorated PNC Strategic Committee continue to meet and be chaired by a chief officer rank.

Recommendation 3

Her Majesty's Chief Inspector of Constabulary recommends that the MPS formally documents a strategy for PNC.

Recommendation 4

Her Majesty's Chief Inspector of Constabulary recommends that the Force develop and publicise suitable policies endorsed by Chief Officers for the management of PNC. The policies should outline the role and responsibilities of staff across the organisation relating to the use of PNC and include details of the implications of non-compliance.

Recommendation 5

Her Majesty's Chief Inspector of Constabulary recommends that the Force review its MDT training provision to ensure that it fulfils the national requirements for PNC training.

Recommendation 6

Her Majesty's Chief Inspector of Constabulary recommends that the Force urgently reviews the provision of borough training for accessing PNC through AWARE. Consideration should be given to suspending borough based training until this review is complete.

Recommendation 7

Her Majesty's Chief Inspector of Constabulary recommends that the Force urgently develop quality and timeliness performance management information at an individual and borough level.

Recommendation 8

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

Conducts a review of PNC systems administrators and reduces the number of people able to create, amend and delete users.

Introduces an independent process to audit PNC users which should be conducted at least annually.

Recommendation 9

Her Majesty's Chief Inspector of Constabulary recommends that:

The MPS reviews its audit resources to ensure that sufficient auditing is carried out across all its data systems.

Reporting and ownership processes are reviewed to ensure that issues identified as a result of audits are rectified in a timely manner.

Recommendation 10

Her Majesty's Chief Inspector of Constabulary recommends that the MPS introduce Data Protection and Information Security training for all police officers and staff.

Recommendation 11

Her Majesty's Chief Inspector of Constabulary recommends that the policy for transaction monitoring and analysis is reviewed in order to implement a robust and effective process.

Recommendation 12

Her Majesty's Chief Inspector of Constabulary recommends that the MPS reviews its procedures, as part of the control room change programme, to ensure that police information is only supplied to authorised individuals.

Recommendation 13

Her Majesty's Chief Inspector of Constabulary recommends that:

A Marketing Strategy be developed, published and implemented to raise awareness for the effective use of PNC across the Force.

The Force includes PNC within the Borough Training Days programme of events.

Recommendation 14

Her Majesty's Chief Inspector of Constabulary recommends that:

The Force reviews its PNCRB resources to ensure that it is able to meet demand.

The Force ensures that all officers are made aware of how PNCRB forms can be easily accessed and ensures that the forms are completed in all cases.

Recommendation 15

Her Majesty's Chief Inspector of Constabulary recommends that the MPS:

Reviews, and where necessary amends, its internal procedures for the receipt and update of court results to ensure that inefficiencies in the process are removed.

Commences updating all court disposals, regardless of their origin, with immediate effect.

Reviews its PNCB resources and internal procedures to tackle the backlog of secondary updates.

Recommendation 16

Her Majesty's Chief Inspector of Constabulary recommends that the MPS ensures that sufficient facilities are in place to enable officers to obtain checks in a timely manner.

Recommendation 17

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

Recommendation 18

Her Majesty's Chief Inspector of Constabulary recommends that the Force expands its current process for the recording of police bail to include bail conditions to ensure that PNC records are complete, accurate and up to date.

Recommendation 19

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

Updates the PNCB3 (Warning Signals) form to ensure that all warning signals are included.

Instructs PNCB staff to record details of warning signals where the offence provides the justification.

Recommendation 20

Her Majesty's Chief Inspector of Constabulary recommends that the Force review the feasibility of enhancing the current warrants management system to include an option of automatically notifying the PNCB where required.

Recommendation 21

Her Majesty's Chief Inspector of Constabulary recommends that the Force introduces a formal process of mentoring and regular refresher training for its PNCB staff.

Recommendation 22

Her Majesty's Chief Inspector of Constabulary recommends that the PNCB review and improve its quality checking procedures for input staff to ensure that the integrity of data is assured.

Recommendation 23

Her Majesty's Chief Inspector of Constabulary recommends that the PNCB consider circulating the contents of DAF reports to facilitate better management of warrants on the PNC.

APPENDIX B – SUMMARY OF GOOD PRACTICES AT THE MPS

- The Force has improved its processes for the receipt of court results from Central London con courts with the introduction of the Porteus system.
- The Force has implemented a forcewide warrants management system enabling it to take a corporate approach in this area.

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.