



NORTH WALES POLICE

22nd JANUARY – 25th JANUARY 2007

**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 North Wales Police between 22nd January to 25th January 2007

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 the 2 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 North Wales Police is responsible for policing a resident population of just over 674,400 with large influxes of tourists and visitors through the summer months. The Force polices a large rural area which includes a national park, numerous seaside resorts and the ferry port at Holyhead in Anglesey as well as the urban conurbation of Wrexham. North Wales Police Headquarters is in Colwyn Bay and has three Basic Command Units [BCU] known locally as Divisions.

These are:

Eastern Division covering Flintshire and Wrexham with a population of 280,268.

Central Division covering Denbighshire and Conwy with a population of 207,402.

Western Division covering Gwynedd and Anglesey with a population of 186,828.

In the summer months Central and Western Divisions have substantial increases in population due to the large numbers of tourists and

visitors the area attracts, to both the seaside resorts and to the Snowdonia National Park. Many of these visitors are from the large urban conurbations around Liverpool and Manchester.

- 1.2.2 As of 2005/6 there were 1617 police officers and 882 police staff as well as 58 Police Community Support Officers (PCSO's) plus 2 other staff and 136 Special Police Constables [SPC]. At the time of the inspection a number of police staff had been informed that their jobs were at risk due to funding cuts. It was expected that most of the posts would go through natural wastage and voluntary redundancy. The Control Room appeared to be particularly vulnerable in this respect.
- 1.2.3 The Force headquarters (HQ) is based at Old Colwyn to the north of the North Wales Police area. The Divisions are supported by several operational headquarters departments, including criminal investigation and communications.
- 1.2.4 The Command Team comprises the Chief Constable, the Deputy Chief Constable (DCC), an Assistant Chief constable (ACC) and a Director of Finance. The team has been broadly established in this format since April 2001 with the exception of the ACC who joined North Wales in January 2005.
- 1.2.5 The creation of Arrest/Summons (A/S) reports at North Wales Police is a semi- automatic process which requires the custody officer to update the NICHE/RMS Custody and Record Management system with the details required to create a record on the PNC. Niche is connected to the Record Management System [RMS]. RMS is then manually searched on an hourly basis by the PNC Bureau [PNCB] staff to collect all Arrestee data. This is followed by the arresting officer completing a CID200 source input document, either in paper form or electronically via RMS which contains all the data required for a complete record on the PNC. This is sent to the PNCB who manually complete the record on the PNC.
- 1.2.6 Magistrates Court results are received in the PNCB via the Magistrates Court System [MCS] printer once they have been validated by the court. The validated registers are printed out and then manually input onto the

PNC including disqualified driver records and bail conditions. Crown Court results are sent electronically via the Xhibit application, however, the Crown Court have had problems with retaining and training staff. On occasion results have been updated on the Xhibit system by Crown Court staff but not released to the portal, and therefore have not been available to the Police. The PNCB staff are therefore unable to ensure that results are accurate and up to date in a timely manner.

1.2.7 Wanted/Missing reports, updates to vehicle information reports, property reports (including stolen firearms, plant equipment and animals) and warrants cancellations on the PNC are the responsibility of the PNCB which provides a 24 hours a day 365 days a year service.. The Bureau also supply telephone checks for officers and perform enhanced searches on the system, such as transaction enquiries, Vehicle On Line Descriptive Searches (VODS), Queries Using Extended Search Techniques (QUEST) and checks of the Violent and Sex Offenders Register [ViSOR]. The Force does not currently use PNC Crimelink although two people have been trained in its use.

1.2.8 The Force has a significant project making PNC available via mobile data [Blackberry's], the next phase will provide mobile data to 120 terminals.

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 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 [now known as National Policing Improvement Agency (NPIA)], 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

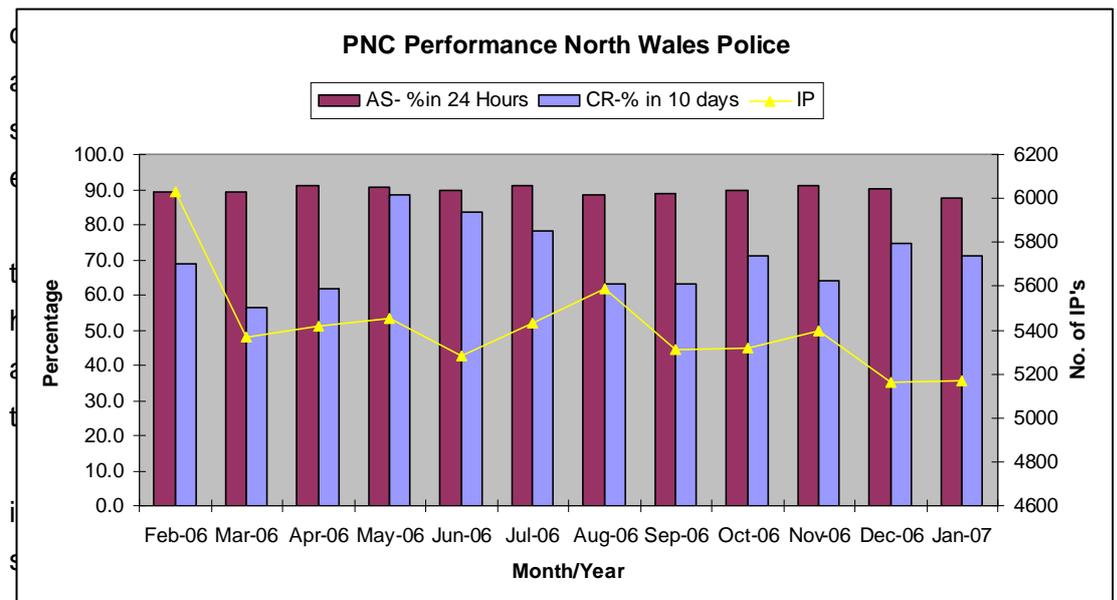
Policing Excellence and endorsed by ACPO, is a statutory code made under s.39a of the Police Act 1996 (inserted by section 2 of the Police Reform Act 2002). It provides scope for the Home Secretary to invoke statutory intervention for Forces failing to comply. With regards to individual Forces, a number 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 North Wales Police performance against the ACPO PNC Code of Practice target for arrest summons input has been consistently just under the target of 90% normally achieving within the 88 – 90% range. In November 2006 the Force attained 91.1% but this fell to 87.7% in January 2007.

1.4.5 In terms of disposals, the Force has suffered dips in performance narrowly failing to achieve the target of 75% within 10 days for each of the last six months. In December 2006, 74.8% of cases were input within 10 days. Performance has ranged from 62.9% to 74.8% with a gradual increase in performance over the last 6 months; however this trend has suffered a sharp down turn in January 2007 with the disposal figure falling to 71.1%.

With regards to Impending Prosecutions (IPs) on the PNC, in the 12 months to November 2006 the Force has shown an overall decrease of 54 IP's. In April 2001, HMIC supported by the Home Secretary stated that all Forces should be in a position to confirm that any outstanding



over twelve months old is legitimately outstanding. In North Wales, current performance with regards to IPs is within the profile established by HMIC in 2001.

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.

- The Force inputs all information onto the PNC including bail conditions and adjournments.
- PNDs (Police Notices for Disorder) and all arrests under section 9 and 10 of the Criminal Justice Act are recorded onto the PNC.
- There are concerns that since the amalgamation of the PNC Steering Group with the Custody Manager's Group the profile of PNC within the force has diminished.
- A lack of resilience with PNC training in Force is causing unnecessary delays in key personnel receiving the training they require to perform their core duties.
- HMIC PNC auditors were concerned that the Force was placing an over reliance on data quality checks by PNCB staff. The last published Data Protection audit was on Stolen Vehicles carried out

in 2005. High risk areas such as Wanted / Missing reports have not been audited for over two years.

- Awareness of key systems such as ViSOR was inconsistent throughout the Force with many operational officers and Control Room staff unaware of the significance of ViSOR markers on PNC.

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

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

1.5.3 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 The main areas of concern highlighted during the inspection in relation to leadership can be summarised with the of the role of the Assistant Chief Constable in driving the PNC Steering Group [PSG], the amalgamation of the PSG with the Custody Manager's Group [CMG] and the PSG in managing PNC effectively within North Wales Police.

2.1.2 The Role of the Chief Officer

2.1.2.1 Previous reports by Her Majesty's Inspector of Constabulary, including the thematic report "On the Record", highlighted the crucial role of Chief Officer involvement in PNC Steering Groups. This is, 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. It is of concern that the majority of the responsibility for the North Wales PNC Steering Group has been devolved by the Chief Officer to a Superintendent who is head of Operational Communications Department (OCD). HMIC Auditors were assured that there is a direct link between the Chair of the PNC Steering Group and the Chief Officer. It was also noted that if the PNC Arrest Summons target is not being achieved, the matter is referred to the Local Criminal Justice Board (LCJB). The ACC does not sit on this group, but often attends on behalf of the Chief Constable. Whilst recognising the conflicting demands placed on Chief Officers and the constraints on their time, their role in driving PNC is vital to the Force's overall performance in this area. It is notable that the PSG has had attendance problems since the ACC devolved responsibility.

2.1.3 PNC Steering Group

2.1.3.1 North Wales had an established PNC Steering Group which used to meet on a regular monthly basis. Due to falling attendance and demands on staff involved in the PNC Steering Group it was merged with the Custody Managers Group as many the same personnel were required to attend both meetings. HMIC Auditors were provided with evidence in the previous three months of minutes of the Group. From

the minutes it is clear that PNC issues have become submerged by the issues raised by the Custody Managers relating to NICHE/RMS. Whilst recognising the reasons for merging the two groups in that NICHE does drive the custody process that ultimately feeds the data to PNC, nevertheless PNC Compliance goes far beyond the targets for creation of Arrest Summons reports e.g, Court Results, links to ViSOR and it is this wider aspect that is missing from the current agenda.

- 2.1.3.2 HMIC Auditors were advised that the PSG/CMG met regularly and had an action plan, however subsequent interviews and a review of the minutes of the group did not confirm this to be the case as it became evident that the group did not meet at all between January 2006 and August 2006, and no evidence of an action plan was available.
- 2.1.3.3 A further review of the minutes of the group confirmed that no Chief Officer had attended the meeting within the last 18 months.
- 2.1.3.4 During the inspection, HMIC PNC Compliance Auditors held a number of meetings and Focus Groups with officers and staff who had various responsibilities with regard to PNC. During the course of these discussions, it became apparent that many saw attendance at PSG/CMG meetings as not "important" within their own role and devolved the responsibility to members of staff within the team. It is of concern to Her Majesty's Inspector of Constabulary that PNC is not given the importance that it merits within North Wales Police
- 2.1.3.5 HMIC Auditors did find that levels of accountability are apparent at BCU and officer level, staff are aware of the timeliness issues and the need for CID 200 source input document to be on PNC within 24 hours

Recommendation 1

Her Majesty's Inspector of Constabulary, whilst recognising the conflicting demands and constraints of time, recommends that:

- **The Assistant Chief Constable takes an active role in the Chairmanship of the PNC Steering Group and that every opportunity is taken to raise the profile of PNC within and throughout North Wales Police.**
- **The PNC Steering Group and Custody Managers group is split into two separate groups to enable the recommendations of this report be effectively instigated and adopted.**
- **In order to ensure actions and those responsible for carrying out the actions are recorded, Her Majesty's Inspector of Constabulary recommend the PNC Steering Group formulate an action plan of points raised in the PSG meetings. This should be a living document able to record timescales and respond to any new issues as they are raised.**

2.1.4 Responsibility and Accountability

2.1.4.1 The Force produces a comprehensive range of management statistics on a monthly basis. This information is circulated to Divisional Commanders and other relevant staff. The information is capable of identifying individual officers who may be underperforming in the timely submission of the CID 200. The statistics are produced in a report format for Divisional Commanders and are also included in the performance statistics that are reviewed on a monthly basis by the DCC and the Divisional Commanders. A reduced version of the statistics are provided to relevant personnel and included on the Force Intranet. This provides suitable access to all senior managers and Divisional Commanders to access the data.

2.1.4.2 HMIC Auditors believe that an area for improvement is to also focus on the quality of the data submitted on the CID 200 especially with the recent implementation of the NICHE RMS system. Several officers or staff members may now be responsible for the direct input of data for

any one record to the system which is then transferred directly to PNC via the interface. The PNC Bureau [PNCB] initiates the transfer over the interface which completes 11 mandatory fields on PNC but due to the high numbers of failures to transfer, initially as high as 93% though this has since been significantly reduced, they are having to update the records manually. Once the updates have been applied they are set aside to match up with the incoming CID 200's. A list of missing CID 200's is sent to the Custody Inspectors on a weekly basis. The PNCB also identify qualitative issues with the CID 200 source documents. These are taken up with the completing officers on an individual basis and by PNCB staff passing information to Team Leaders to be relayed to the BCU's on an ad hoc basis therefore as this information is not recorded holistically, it is difficult to identify trends that would enable the force to take effective remedial action to improve the situation, be it from a supervisory or training perspective.

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that the Force develops a strategy to ensure the quality of data that is inputted onto the CID 200 at source, in order to negate the inefficient process of having to double check every entry. Additionally that the NICHE/RMS system resolves the high volume of failures in the interface to PNC, and ensures PNC data quality meets nationally defined Management Of Police Information (MOPI) standards

2.2 Policy and Strategy

2.2.1 PNC Policy and Strategy

2.2.1.1 HMIC Auditors were pleased to note the existence of a number of individual policy documents relating to wanted persons on PNC, blocked vehicles, source input completion and submission, Updating stolen vehicles on PNC, and PNC convictions disclosure, these were available in electronic version on the Force intranet and paper format. However, an over arching strategy relating to PNC was not available, nor were there policies in place for many other functions of PNC including the roll out of PNC on mobile data terminals. HMIC Auditors

were advised that the Force is moving away from detailed policy documents towards procedural guides. The only guide of this type available was the Protocol for the Management of Community Penalty Breach Warrants. This was a comprehensive document including definitions, procedural maps, actions, reviews and signatories agreeing to the adoption of the protocol.

2.2.1.2 At the time of the audit HMIC Auditors did not find any evidence of, nor were they provided with any policies, procedural guides or strategy documents relating to the training of PNC within Force.

2.2.1.3 With regards to the PNC Strategy, the Force has produced a draft strategy document for the PNC Steering Group. This includes a mission statement of where the Force would like to go but does not include an action plan detailing how the Force intends to achieve this or who is responsible for ensuring the actions are carried out. The action plan should cover topics such as marketing, training and operational use of PNC, HMIC Auditors encourage the Force to review and update the plan to include future issues that will have an impact on PNC functions. For example, the roll out of NICHE/RMS the introduction of the Blackberry Mobile Data Terminals (MDT's) and Schengen¹. The action plan can then be used as a living document to evidence progress on work and to ensure that these issues are kept in focus at PNC Steering Group meetings.

¹ Schengen Information System is a Europe-wide database of Nominal, Vehicle and stolen property information which uses PNC as a platform to share similar data belonging to the United Kingdom.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that North Wales Police:

- **Introduces up to date PNC policies and procedural guides to cover operational use of PNC within the Force.**
- **Introduces a PNC strategy, policies and procedural guides that affect the training of PNC within the Force.**
- **Reviews the draft strategy document for the PNC Steering Group and include an action plan that can be updated with future issues that will affect the Force in relation to all areas of PNC.**

2.2.2 PNC Security

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

2.2.2.2 Access to the PNC is via browser based software, the level of access is dependent upon role and training received. HMIC Auditors consider this to be good practice.

2.2.2.3 User access is well controlled by the PNCB Manager and two deputies on a spreadsheet based application. These staff can create, update and delete users of PNC. Staff moves within the force and leavers are identified via Force Orders. The PNC user ID's are not audited independently and whilst HMIC Auditors do not question the integrity of the work of the PNCB Manager and other PNCB staff who can create PNC User ID's, 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.

2.2.2.4 Nobody is given access to PNC without having completed the required

PNC course. On completing the course users have to sign a document agreeing to their responsibilities with regard to Data Protection; this is considered as good practice.

2.2.2.5 There is also a process in place where users who have not accessed PNC for more than 6 months have their access automatically deleted. However there are no policies or procedures in place covering the reinstatement of PNC authorities for those returning to work after prolonged absence or change of role when they have not used PNC for some time. This is currently dealt with on an ad hoc basis without any formal guidance.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that North Wales Police:

- **Introduces an independent audit, at least annually, of all user access administration.**
- **Constructs a policy and procedural guide for dealing with users returning to using PNC after prolonged absence and or loss of PNC access.**

2.2.2.6 Data Protection Audits of PNC are a requirement of the ACPO Data Protection Audit Manual (DPAM) and should be carried out in an audit cycle. HMIC Auditors were shown a 5 year risk based audit plan and comprehensive Data Protection and Security policy and strategy documentation.

2.2.2.7 However, despite the existence of the audit plan, prior to a current audit that is taking place against ViSOR records, the only previous audit against PNC data was a Stolen Vehicle audit carried out in 2005. Other applications on the PNC that are considered high risk, for example, the Wanted/Missing index, are not routinely audited by the force. The last audit of the Wanted/Missing index was carried out over two years prior to this inspection. .

2.2.2.8 Nevertheless, HMIC auditors were shown copies of the previous reports and were reassured that the reports were comprehensive. The reports cover all aspects of the process of the data management and are

produced in accordance with the ACPO DPAM.

- 2.2.2.9 The PNCB carry out Data Quality checks on a daily basis, the results of which are given to the PNCB Manager on a monthly basis. HMIC Auditors were concerned that an over reliance on these checks was contributing to the perception that this reduced the need for regular independent audits by the Data Protection Team

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that North Wales Police reviews its plan for PNC audits on a risk basis and carries out the plan as per guidance in the ACPO Data Protection Audit Manual

- 2.2.2.10 Transaction monitoring is a requirement of the ACPO Data Protection Audit Manual. It is a process where police officers and staff are required to verify their reasons for performing transactions on the PNC. It is therefore an important activity in the prevention and detection of misuse or abuse of the PNC. North Wales Police has an automated transaction monitoring system where users receive requests for details of the reason for transactions being carried out via e-mail. This is then passed to the individual's line manager for endorsement of the information supplied. HMIC Auditors were given anecdotal evidence that line managers are signing off the checks without always checking them back to the source. The DPO did advise the HMIC Auditors that she was going to introduce dip sampling of the signing off process by line managers as part of their Data Protection checks, to ensure that transactions had been checked back to the source by line managers.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that North Wales Police review its transaction monitoring procedures and ensures the endorsement of audit checks is meaningful and substantiated.

- 2.2.2.11 HMIC Auditors also reviewed the role of the Professional Standards Department (PSD) with regard to PNC issues at North Wales Police. The PSD are represented on the PSG/CMG by the Data Protection Officer. They have an innovative approach and several areas of good practice were noted.
- 2.2.2.12 The PSD does proactive work in relation to PNC checks via an intelligence based approach based on the National Intelligence Model [NIM]. Issues raised via the existing transaction monitoring process or through a complaint are passed for further investigation to the PSD. HMIC Auditors believe this is good practice.
- 2.2.2.13 North Wales Police has introduced a "Confidence Procedure" as per suggestion G of the thematic report "Raising the Standards" which recommended all forces should have a Confidence Procedure in place by January 2007. A Confidence Procedure falls below a disciplinary procedure and any allegation does not have to be proven, it can be based on a balance of probabilities. The result is an action plan to deal with the issue thereby reducing the risk of a member of staff coming to the notice of PSD in the future. It is instigated by the Integrity Unit and signed off by a chief officer, the action plan can result in the removal of certain privileges from the member of staff until the issue is resolved and can be used for management of access to a computer system, including PNC, if this is the area of work where confidence has been lost. This is good practice.
- 2.2.2.14 Additional good practice was noted when HMIC Auditor's were shown copies of a "Lesson's Learned" bulletin that is published on an ad hoc basis. The bulletin is available as a paper copy, via email or electronically on the Force Intranet and is used to publicise investigations by the PSD including those involving the PNC, it details the outcome and details of the lessons learned.

2.2.2.15 PSD are also proactive in attending all training courses for student officers and giving inputs on Data Protection. Additionally a Detective Chief Inspector [DCI] also gives talks to all student officer intakes covering the work of the PSD section, and information on the importance of avoiding leakage of information from Police IT systems, confidence issues and giving practical examples. All IT training courses include information about Data Protection. This is good practice.

2.3 People

2.3.1 Marketing and Awareness

2.3.1.1 During meetings and focus groups, HMIC Auditors noted variable levels of awareness among officers and staff of the information contained on PNC and its functionality. In general, knowledge of PNC, VODS and QUEST was very good but with the notable exception of ViSOR which was very low outside of the Management of the Dangerous Persons arena. This was particularly noticeable amongst control room staff and operational officers.

2.3.1.2 The Force has a PNC intranet site where officers and staff can access information. However, this places the reliance onto the officers and staff to find the information themselves. Newly appointed officers receive a PNC presentation supplied by the PITO PNC Customer Services from Hendon and in the past similar presentations have been given to other officers and staff. In the view of the HMIC Auditors, a focused marketing campaign should be carried out to raise the level of awareness of ViSOR and its links to PNC, using a variety of communications methods.

2.3.1.3 HMIC Auditors found that as the Force does not use PNC Crimelink awareness of the benefits of utilising its cross border crime searching capabilities for unsolved crime was negligible.

Recommendation 7

Her Majesty's Inspector of Constabulary recommends that the Force publishes and implements a marketing strategy and includes it as a standing item on the agenda of the PSG in order to:

- **Raise awareness for the effective use of ViSOR across the Force.**
- **Considers the best way to market future upgrades and ongoing changes to PNC.**
- **Reviews the use of PNC Crimelink within Force and considers the marketing issues for Crimelink.**

2.3.2 PNC Training

2.3.2.1 North Wales PNC Training was an area of serious concern for the HMIC Auditors. There are no PNC Training Strategy or policies, there were serious deficiencies in several areas of the training element of PNC that leave the Force lacking resilience and exposed to risk. North Wales Police has five ICT trainers who are qualified to train PNC enquiries, one full time PNC trainer plus a PNC Manager and a PNC Liaison Officer who are all accredited enquiry and update trainers.

2.3.2.2 However the current full time trainer is the only one that has the accreditation to deliver training on the use of the Blackberry terminals and Vehicle Online Descriptive Searching (VODS) and Queries Using Extended Search Techniques (QUEST). If this trainer should leave or be absent from work the force does not have the resilience to continue to deliver the training. This situation already has had an impact on training where there were significant backlogs at the time of the audit with PNCB staff waiting for VOD and QUEST training, 120 staff requiring training in the use on PNC on the Blackberry terminals as the full time trainer had lost her Centrex training authorisation due to being off for over 6 months on maternity leave.

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that as a matter of urgency:

- **North Wales Police reviews it's PNC training strategy, structure and staffing of PNC training due to the lack of resilience.**
- **The Mobile Data Project and PNC Training work together to review the impact of large training requests from the MDT project and build resilience into the PNC training plan.**
- **The Mobile Data Project is represented on the force PSG.**

2.3.2.3 It was reported that North Wales currently has one dedicated accredited PNC trainer who works 4 days per week based at Prestatyn and is line managed by the Training Manager for the OCD based at St Asaph. Two members of the PNCB staff are also accredited PNC trainers and deputise when the PNC Trainer is unavailable. The PNCB staff can only assist with the training when their core role commitments permit. They do not train on a regular basis, which can lead to the risk of diluting their training skills, makes it more difficult for them to remain aware of current PNC training issues. Additionally due to current understaffing in the PNCB they are unlikely to be able to deliver PNC training in future. A second IT Trainer works as a dedicated Control Room Trainer at St Asaph but although trained in basic enquiry levels of PNC is not an accredited PNC Trainer, consequently they do not carry out any PNC training. This lack of resilience leaves the force in a position of risk. The Force does not currently offer PNC refresher training.

2.3.2.4 The lack of resilience was evident at the time of the inspection. The dedicated PNC trainer is currently seconded to the NICHE/RMS interface project, HMIC Auditors were advised that all classroom based PNC training had been cancelled until June 2007. This included training for 120 officers waiting for training on use of the PNC via mobile data on the Blackberry hand sets. Overall there is a waiting list of 140 people waiting for PNC training, not including Force Control Room staff who are currently using distance learning materials for PNC.

2.3.2.5 The training of PNC does not form part of the initial 12 week training programme for Control Room Staff. They have to be trained after they

start working in the control room environment. Due to staffing issues in the Control Room it is difficult to allow these staff to receive the training in PNC. Anecdotal evidence collected by HMIC Auditors from user group records shows that many newer Control Room staff are not fully trained in PNC and have to ask another more experienced operator or contact the PNCB for a PNC check. Additional anecdotal evidence was given to HMIC auditors of operational officers being unable to get a check via the Control Room due to no one being trained and having to wait for long periods of time before getting through to the PNCB. HMIC Auditors were made aware that the Force is reviewing this situation and plan to include PNC training as part of the Control Room staffs' initial training.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that as a matter of urgency:

- **PNC Enquiry training, and update training, should be included in the initial phase of operator training.**
- **The Force should implement and fulfil its amended training plan for PNC training for Control Room Staff and to ensure staff are trained in a safe learning environment.**

2.3.2.6 It was reported that PNC training is planned 12 months ahead, by the PNC Trainer who also has the responsibility for all the administration concerning PNC courses, as well as writing materials and delivering the classroom based lessons. The PNC trainer considers that planning the courses so far ahead is unwieldy and limits the ability to react flexibly to force demands for training. In addition places for courses are allocated on a first come first served basis with no account taken of whether the course is critical to the user's role.

2.3.2.7 As a result the PNC Trainer has been unable to develop Training Needs Analysis [TNA], which is vital to manage training requirements, and could reduce the backlog of staff requesting to be trained in PNC. Historically PNC Training has been managed separately to other ICT training within the Force and trained in isolation.

Recommendation 10

Her Majesty's Inspector of Constabulary recommends:

The post of PNC trainer in the force should be reviewed to maximise the core responsibility of the role and consider removing the administration work to other parts of the organisation or integrated within the ICT Training administration structure.

2.3.2.8 Prospective candidates are required to apply for a PNC course through their line manager before being approved to the PNC Trainers. However, HMIC Auditors learned from focus groups that there was inconsistency as to who was approved to receive PNC training between BCU's. The Force should consider reviewing its policy and introduce a

matrix of criteria and role profiles for approving places onto PNC courses to ensure equality across the Force.

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that the Force reviews the criteria and policy for assessing prospective candidates for PNC courses and considers producing a role profile matrix as guidance for line management to ensure fairness of allocation of courses across the Force.

2.3.2.9 HMIC Auditors were informed that the Force had recognised its deficiencies to deliver enough PNC training, particularly to Control Room staff and had purchased distance learning materials to cover the shortfall. These are PNC training materials originally produced by Derbyshire Constabulary and further developed by Merseyside Police that are designed to be used as Supported Learning Modules (SLM) with an accredited PNC trainer on hand to support candidates.. The modules all have approximate guided learning hours that should be negotiated between staff and line management to allow them to train in a safe learning environment away from their place of work with access to an accredited PNC trainer. However, North Wales Police are not using the SLM in the prescribed manner. Staff reported that they were using them at their desks between answering calls, on night shifts with no supporting trainer and that they had to wait for queries to be answered and final assessments to be carried out. Consequently HMIC Auditors are concerned that the materials are not being used in the way they were designed to be used, effectively managed, nor properly supported, leading to poor and ineffective training which could impact on officer safety. The change in use of the learning modules may also mean that they no longer meet the required standards and the force is therefore encouraged to seek the views of Centrex to gain approval for their continued use.

Recommendation 12

Her Majesty's Inspector of Constabulary recommends that if the Force continues to use the supported learning materials as distance learning materials in the current manner they should be evaluated by NPIA [formerly Centrex] or Skills for Justice to ensure they are fit for purpose

- 2.3.2.10 North Wales Police PNC courses have a written assessment at the end within a minimum pass mark of 70%. Candidates are then required to complete a post training evaluation in the form of a "happy sheet", whilst this is considered good practice no other evaluation is carried out to check the transference of knowledge. A further evaluation a few weeks later once the candidate is in post and using PNC in a live environment would ensure that the level of training is appropriate to the individuals and the post.
- 2.3.2.11 Student constables on the Initial Police Learning and Development Programme (IPLDP) receive a PNC presentation from PITO PNC Customer Service staff which is considered to be good practice. Information gathered from focus groups has shown that this presentation is useful as the students remember the content of the presentation. HMIC Auditors encourage the Force to continue with this awareness training.
- 2.3.2.12 Staff advised the HMIC Auditors that the only mechanism they had to raise issues and concerns regarding PNC Training was through the Training and Development Practitioner's Group. However, this group is primarily concerned with student officer training.
- 2.3.2.13 The current PNC trainer has been in post for 5 years and has never had any classes they have delivered; or materials they produce evaluated by line management or other training professionals.

Recommendation 13

Her Majesty's Inspector of Constabulary recommends:

- **North Wales Police should review its TNA and evaluation of PNC training courses, transference of knowledge, PNC training materials and PNC trainers.**
- **The Force should review the mechanism for flagging issues and concerns surrounding PNC training. Consideration should be given to making PNC training a standing item on the PSG agenda**

2.4 Partnerships and Resources**2.4.1 Relationship with the Courts**

2.4.1.1 The Force has quarterly meetings with the local courts through a group known as the Secure Email Group. HMIC Auditors consider it to be good practice that a member of the PNC Steering Group also sits on the LCJB to provide a linkage between the police and the court. Anecdotal information received from Focus Groups also reported a good relationship between inputting staff and court staff, however, they do have queries relating to serious cases since August 2006 still outstanding despite regular contact to resolve the queries.

2.4.2 Relationship with Non Police Prosecuting Agencies (NPPAs)

2.4.2.1 With the introduction of the Code of Practice for PNC in January 2005, the target for the input of A/S records no longer includes those records which are updated as a result of an NPPA prosecution. However, there is still a need for Forces to ensure that these records are updated in a timely manner to assist operational policing activity. This can only be achieved if Forces encourage the NPPAs to provide complete, timely and accurate information for input to PNC. It was reported during the inspection that the Force does not have Service Level Agreements with its NPPAs.

Recommendation 14

Her Majesty's Inspector of Constabulary recommends North Wales Police to review its Service Level Agreements with NPPA's.

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 The creation of Arrest/Summons (A/S) reports at North Wales Police requires the custody officer to update the NICHE/RMS system with the details needed to create a skeleton record on the PNC. Niche is connected to the Record Management System [RMS]. RMS is then manually searched on an hourly basis by the PNC Bureau [PNCB] staff to collect all arrestee data. This is followed by the arresting officer completing a CID 200 either in paper form or electronically via Niche/RMS which contains all the data required for a complete record on the PNC. This is sent to the PNCB who manually update the record on the PNC. HMIC Auditors learned that only 7% of records transfer from NICHE to PNC automatically, 93% of records need checking and manual intervention by PNCB staff.

2.5.1.3 Once the updates have been applied, they are set aside to match up with incoming source documents. A list of missing source documents is sent to the Custody Section Inspectors on a weekly basis. The PNCB also identify qualitative issues with the source documents.

2.5.1.4 For those offenders that are not taken to the Custody Suites i.e. those issued with Penalty Notices for Disorder (PND's) the resultant paperwork is either, scanned into Niche/RMS, faxed, or emailed to the PNCB which operates 24/7. On the 20th of each month the Central Ticket Office (CTO) provide PNCB with a list of PND's that have been issued in order that PNCB can ensure that PNC has been updated in each case. This process is currently being reviewed to investigate the

possibility of increasing the frequency of the comparative checks between CTO and PNC. An increase in the frequency of the searches will reduce the risk of the negative effect on statistical performance that the force currently experiences on a monthly basis.

- 2.5.1.5 In addition to the other searches PNCB staff make another manual search on a 12 hourly basis to identify any disposals e.g. No Further Action (NFA) that have been added to NICHE. These disposals are then manually added to PNC.

Recommendation 15

Her Majesty's Inspector of Constabulary recommends that the Force develops a more efficient process of transmitting data from NICHE/RMS to PNC. Error rates currently experienced are causing duplication of effort in order to attain performance targets.

- 2.5.1.6 HMIC Auditors were made aware that a roll out of hand held "Blackberry" terminals was underway and the Force were informed that they should consider the possible opportunities in sending PND information via this medium.

2.5.2 Updating of Court Results

- 2.5.2.1 The Force currently updates all relevant data from the court registers onto the PNC, including disposals, remands, adjournments and bail conditions. HMIC auditors recognise this as good practice in ensuring that records are not only accurate but complete for the benefit of all PNC users that may have reason to access the records which are updated by North Wales Police.

- 2.5.2.2 Magistrates Courts data is received electronically via the EQUIS courts system. It is printed out in the PNCB to enable operators to manually update the results on to the PNC. HMIC Auditors were encouraged to note that following receipt of the information, the Force does update the data in a timely manner and keeps records to evidence this.

- 2.5.2.3 Xhibit is the electronic system to obtain Crown Court results, but the Force has had problems due to reported training issues with Crown Court Staff. There have been occasions when the results have been put onto the Xhibit system by Crown Court staff but not released to the

portal, and therefore not available to PNCB staff causing delays in updating PNC. Anecdotal evidence was also given to HMIC Inspection staff of queries relating to Crown Court results dating back to August 2006 that they were struggling to resolve on an individual basis.

Recommendation 16

Her Majesty's Inspector of Constabulary recommends that North Wales Police considers implementing a mechanism and SLA with the courts in order to raise outstanding queries and work together with the courts to resolve issues.

2.5.2.4 Supplementary Court registers (these are registers that are in addition to the normal court register) they usually contain one or more court cases, where the court has had a query, and which the court have been unable to resolve, on occasions there are significant delays in the query being solved, some being over 6 months old. At the time of the audit the PNCB had just received a register of court results dating back to October 2006.

2.5.2.5 Outstanding Impending Prosecutions (IPs) are followed up by the PNCB on receipt of the monthly Daily Activity File (DAF) report. Most queries are resolved without the need to contact the court as the force has online access to the court system. However, despite the force currently managing the IPs on a monthly basis, there is a reliance on the experience of operators deciding when to delete outstanding records. The force does not have any formal procedures relating to the management of old outstanding IP's. E g if PNCB believe that a warrant should be withdrawn it is based on the experience of the PNCB staff who have no guidelines or process maps to consult.

Recommendation 17

Her Majesty's Inspector of Constabulary recommends that North Wales Police considers and reviews the process and procedures to produce formal documentation and guidelines for the outstanding impending prosecutions decision making process.

2.5.3 Ad hoc intelligence updates

2.5.3.1 The process for inputting ad hoc intelligence onto the PNC requires an officer to submit a PNC Update form to the PNCB. However anecdotal evidence was provided that suggests that only ad hoc intelligence updates received by the PNCB are generated by the staff from the disclosure unit who are dealing with applications from the Criminal Records Bureau staff (CRB). If staff see an address on an application form that is different to the current address shown on the PNC, the details are provided to the PNCB who then update the relevant record on the PNC. Officers in focus groups reported that they were mostly unaware of the process and the need for an intelligence update form to be completed. The result is that vital intelligence is not being recorded onto the national system and is only being held on the local system. Consequently, other Forces do not have direct access to this information.

Recommendation 18

Her Majesty's Inspector of Constabulary recommends that the Force issues guidance to officers and staff of the procedure for getting ad hoc intelligence updated onto the PNC.

2.5.4 Data Quality

2.5.4.1 The PNCB has one dedicated data controller. Each year a plan is developed to determine what level of quality control is to be carried out against the various elements of the PNC. The plan requires either 100% quality controls or dip sampling of the various PNC reports that include warrants, property and vehicle reports. Newly trained staff have their work 100% checked by supervisors, whilst experienced staff are subject to dip sampling of their work. The quality assurance does not review processes and purely examines the accuracy of the data. Results of the QA checks are recorded on a database and reports produced for the PNC Manager who includes the information in the monthly reports to senior managers and BCU commanders.

2.5.4.2 HMIC Auditors conducted reality checks to determine the quality of data being supplied by officers and subsequently input to PNC. This was achieved by obtaining court registers and source input documents

reviewing their content and comparing the details submitted to the PNC record. HMIC Auditors were pleased to note that the Force updates all remand histories, adjournments and bail conditions on the system, which is accepted as good practice.

2.5.4.3 One full court register was checked from Llandudno magistrates Court 18/12/2006 Three minor errors were identified, and one disposal had not been updated which is a serious error.

2.5.4.4 90% of Arrest Summons forms checked were accurate, only one minor error was found.

2.5.4.5 All Vehicle Information reports and all Lost or Stolen Vehicle reports created on 23/1/2007 were checked with no errors identified.

2.5.4.6 A QUEST check for general data quality on Names reports on PNC created by North Wales Police revealed the following errors. Eleven records were shown of females having a beard. There were also 145 records of individuals under the age of 12 with 23 having a PNCID number within a year of the date of birth. These were provided to the Force to check the data and amend the records.

2.6 Results

2.6.1.1 Prior to June 2006, North Wales regularly exceeded the target of 90% for the inputting of Arrest/Summons (A/S) updates onto the PNC within 24 hours. However the recording of PND's on PNC has had an adverse effect on the target figures achieved. In June 2006 the force achieved 89.8%. Since then the Force performance has been inconsistent and only achieved or exceeded the 90% target in July, November and December 2006. The PNCB has carried out extensive research to find deficiencies in the processes that have restricted them in achieving the target and has reviewed processes in an effort to improve and are hopeful proposed changes to IT systems will assist in this goal. HMIC Auditors are reassured that the PNCB are diligent in their efforts in this area.

2.6.1.2 In terms of court results, North Wales were regularly achieving the 75% target prior to August 2006. The Force suffered a dip in performance since the recording of PND's were introduced and also due to the

implementation of the NICHE/RMS system. In September 2006 the figure dropped to 62.9%, since then the PNCB has worked hard to achieve the target and in December 2006 achieved 74.8%, though in January 2007 this fell to 71.1%. HMIC Auditors are aware that some of the factors contributing to the failure to meet targets are outside of the PNCB area of influence and that they are working hard to achieve the current figures. The increase in the number of A/S reports is generally due to the powers under Section 9 and 10 of the Criminal Justice Act 2003, where are persons arrested for a all recordable offence must be recorded on the PNC.

2.6.1.3 Finally, with regard to outstanding prosecutions on the PNC in the 12 months to January 2007 the Force has shown an overall decrease of 14.22% (857 impending prosecutions)

APPENDIX A**SUMMARY OF RECOMMENDATIONS FOR NORTH WALES POLICE****Recommendation 1**

Her Majesty's Inspector of Constabulary, whilst recognising the conflicting demands and constraints of time, recommends that:

- The Assistant Chief Constable takes an active role in the Chairmanship of the PNC Steering Group and that every opportunity is taken to raise the profile of PNC throughout North Wales Police.
- The PNC Steering Group and Custody Managers group is split into two separate groups to enable the recommendations of this report be effectively instigated and adopted.
- In order to ensure actions and those responsible for carrying out the actions are recorded, that the PNC Steering Group formulate an action plan of points raised in the PSG meetings. This should be a living document able to record timescales and respond to any new issues as they are raised.

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that the Force develops a strategy to ensure the quality of data that is inputted onto the CID 200 at source, in order to negate the inefficient process of having to double check every entry. Additionally the NICHE/RMS system resolves the high volume of failures in the interface to PNC, and ensures PNC data quality meets nationally defined Management Of Police Information (MOPI) standards.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that North Wales Police:

- Reviews the lack of PNC policies and procedural guides to cover the operational use of PNC within the Force.
- Introduces a PNC Strategy, Policies and Procedural Guides that affect the training of PNC within the Force.

- Reviews the draft strategy document for the PNC Steering Group and include an action plan that can be updated with future issues that will affect the Force in relation to all areas of PNC.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that North Wales Police:

- Introduces an independent audit, at least annually, of all user access administration
- Constructs a policy and procedural guide for dealing with users returning to using PNC after prolonged absence and or loss of PNC access.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that North Wales Police reviews its plan for PNC audits on a risk basis and carries out the plan as per guidance in the ACPO Data Protection Audit Manual

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that North Wales Police review its transaction monitoring procedures and ensures the endorsement of audit checks is meaningful and substantiated.

Recommendation 7

Her Majesty's Inspector of Constabulary recommends that the Force publishes and implements a marketing strategy and includes it as a standing item on the agenda of the PSG in order to:

- Raise awareness for the effective use of ViSOR across the Force.
- Considers the best way to market future upgrades and ongoing changes to PNC.
- Reviews the use of PNC Crimelink within Force and considers the marketing issues for Crimelink.

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that as a matter of urgency:

- North Wales Police reviews its PNC training strategy, structure and staffing of PNC training due to the poor resilience and training backlogs.
- The Mobile Data Project and PNC Training work together to review the impact of large training requests from the MDT project and build resilience into the PNC training plan.
- The Mobile Data Project is represented on the Force PSG.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that as a matter of urgency:

- PNC Enquiry training, and update training, should be included in the initial phase of operator training.
- The Force should implement and fulfil its amended training plan for PNC training for Control Room Staff and to ensure staff are trained in a safe learning environment

Recommendation 10

Her Majesty's Inspector of Constabulary recommends the post of PNC trainer in the force should be reviewed to maximise the core responsibility of the role and consider removing the administration work to other parts of the organisation or integrated within the ICT Training administration structure.

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that the Force reviews the criteria and policy for assessing prospective candidates for PNC courses and considers producing a role profile matrix as guidance for line management to ensure fairness of allocation of courses across the Force.

Recommendation 12

Her Majesty's Inspector of Constabulary recommends that if the Force continues to use the supported learning materials as distance learning materials in the current manner they should be evaluated by NPIA [formerly Centrex] or Skills for Justice to ensure that are fit for purpose.

Recommendation 13

Her Majesty's Inspector of Constabulary recommends

- North Wales Police should review its TNA and evaluation of PNC training courses, transference of knowledge, PNC training materials and PNC trainers.
- The Force should review the mechanism for flagging issues and concerns surrounding PNC Training. Consideration should be given to making PNC Training a standing item on the PSG agenda

Recommendation 14

Her Majesty's Inspector of Constabulary recommends North Wales Police to review it's Service Level Agreements with NPPA's.

Recommendation 15

Her Majesty's Inspector of Constabulary recommends that the Force develops a more efficient process of transmitting data from RMS/NICHE to PNC. Error rates currently experienced are causing much duplication of effort in order to attain performance targets.

Recommendation 16

Her Majesty's Inspector of Constabulary recommends that North Wales Police considers implementing a mechanism and SLA with the courts in order to raise outstanding queries and work together with the courts resolve issues.

Recommendation 17

Her Majesty's Inspector of Constabulary recommends that North Wales Police considers and reviews the process and procedures to produce formal documentation and guidelines for the outstanding impending prosecutions decision making process.

Recommendation 18

Her Majesty's Inspector of Constabulary recommends that the Force reminds officers and staff of the procedure for getting ad hoc intelligence updated onto the PNC.

APPENDIX B**SUMMARY OF GOOD PRACTICES AT NORTH WALES POLICE**

- Access to the PNC is via browser web based software and level of access is dependent upon role and training received.
- No one is given access to PNC without having completed the required PNC course. On completing the course users have to sign to say they understand their responsibilities with regard to Data Protection.
- The PSD section does proactive work in relation to PNC checks via an intelligence based approach based on the National Intelligence Model [NIM]. Issues raised via the existing transaction monitoring process or through a complaint are passed to the investigation section of PSD.
- North Wales Police has introduced a “Confidence Procedure” – this falls just below a disciplinary procedure and any allegation does not have to be proven, it can be based on a balance of probabilities. The result is an action plan to deal with the issue of leakage from PNC and other Police systems there by lessening the element of risk. Instigated by the Integrity Unit and signed off by a chief officer, the action plan could result in the removal of certain privileges from the member of staff until the issue is resolved.
- A “Lesson’s Learned” bulletin is published on an ad hoc basis in Force and is available as a paper copy, via email or electronically on the Force Intranet. It is used to publicise instances when PSD have had to investigate and gives the outcome and details of the lessons learned.
- PSD are also proactive in visiting all training courses for student officers and giving inputs on Data Protection, additionally a Detective Chief Inspector [DCI] also gives talks to all student officer intakes covering the work of the PSD section, and information on the importance of avoiding leakage, confidence issues and PNC etc. All IT training courses include information about Data Protection.
- Nobody is given access to PNC without having completed the required PNC course. On completing the course users have to sign a document agreeing to their responsibilities with regard to Data Protection; this is considered as good

practice.

- Student constables on the Initial Police Learning and Development Programme (IPLDP) receive a PNC presentation from PITO Customer Service staff which is considered to be good practice. Information gleaned from focus groups has shown that this presentation is useful and the students remember the content of the presentation.
- HMIC Auditors conducted reality checks to determine the quality of data being supplied by officers and subsequently input to PNC. This was achieved by obtaining court registers and source input documents reviewing their content and comparing the details submitted to the PNC record. HMIC Auditors were pleased to note that the Force updates all remand histories, adjournments and bail conditions on the system, which is accepted as good practice.

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.