

PNC Re - inspection – Feedback Matrix

Force: South Yorkshire
Date of Original Report: July 2005

1. Background

- 1.1** It was agreed by HMIs that the forces receiving a grading of poor in the first round of PNC inspections would receive a focussed re-inspection to include scrutiny of the progress or compliance with the recommendations from the initial report.
- 1.2** The initial inspection took place in July 2005, since that time the force has worked towards implementation of all recommendations from the report.
- 1.3** In the interim period since the last inspection, there have been few changes in the location of PNC within the force. The PNC Bureau remains situated at Atlas Court and falls within the Operational Communications Service (OCS) departmental structure.
- 1.4** The change of chief officer with responsibility for PNC and the re-alignment of responsibilities at the strategic level has delivered substantial improvements. ACC Andy Holt holds the portfolio for Territorial Operations which now includes PNC. This indicates the acknowledgement of the force of the operational benefits that PNC provides in addition to its record keeping functions.
- 1.5** 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 re-inspection.

2. Current Position

- 2.1** South Yorkshire Police have maintained their performance against the ACPO target of entering 90% of arrest summons reports within 24 hours. Between October 2006 and September 2007, the force only failed to achieve the target in 3 out of twelve months. In the months when performance was not achieved, the highest margin of failure was only 1.5%, when the force achieved 88.5% in February 2007. The performance data makes positive reading however, the force must acknowledge that whilst timeliness is being achieved, it must also strive to ensure that all records are complete and accurate.
- 2.2** With regards to court results, performance has not been as consistent with the target only being met in 3 out of the last twelve months. In October 2006, the force updated 80.2% of disposals within 10 days. This has dropped to 70.1% in September 2007. One of the main factors in this drop in performance has been the inability to receive electronic data, relying on hard copies of court information being delivered by courier. Improvement in timeliness have been achieved since the last inspection but the process still limits the ability of the force to hit the target on a regular basis. HMIC Auditors are aware that the Libra court system is due to

be implemented in December 2007, therefore, any technical changes in advance of its implementation would not be economical for the force.

- 2.3** The final area that is considered in this part of the report is that of impending prosecutions (IPs). In the 12 months, the number of IPs has increased by 11.5% from 10,069 in October 2006 to 11,214 in September 2007. The force has assigned the responsibility for managing IPs to a team of staff within the PNC Bureau as one of their functions. However, due to the increase in the overall number, HMIC Auditors encourage the force to review the details of this process to satisfy itself that all IPs are being managed effectively.

3. Conclusion

- 3.1** The re-inspection concentrated on the recommendations of the previous report from July 2005. The previous grading structure was used to provide a final assessment:

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.

- 3.2** HMIC's assessment of PNC compliance within the force is **Fair**.

- 3.3** This assessment is based upon South Yorkshire Police's response to the recommendations in the previous report which are detailed below.

- 3.4** The key issues which have contributed to this grading are the continued lack of data protection auditing, management of data quality and the inefficiencies of processes supporting the use of PNC, for example, the disparate ways of requesting vehicle and name enquiries.

- 3.5** HMIC Auditors are concerned that the PNCB appears to be the sole guardian of data quality when the responsibility should rest with the originator. This creates an additional burden for the bureau and does little to reduce slipshod working practices.

- 3.6** However, despite the grade, HMIC are reassured that the current regime within the force can demonstrate the drive and ability to improve further.

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1	<p>Her Majesty’s Inspector of Constabulary recommends that the Force ensures that the strategic position of the PSG is maintained and all members make every effort to attend.</p>	<p>Achieved</p>	<p>Following a change of Chief Officers within the force and the subsequent change to Chief Officers responsibilities and portfolios, there has been a positive response in relation to the PNC. The PNC Steering Group (PSG) is now regularly chaired by ACC Andy Holt, (Territorial Operations). During the course of the re-visit, all staff commented on the renewed drive towards PNC compliance and performance and numerous comments were received that the forces approach to PNC has improved.</p> <p>Furthermore, attendance of the PSG has also improved with each Basic Command Unit (BCU) being instructed to send a representative with appropriate authority. The result is that each BCU now sends the Chief Inspector (Operations) to the PSG.</p>	
2	<p>Her Majesty’s Inspector of Constabulary recommends that the Force develops and reacts to monthly performance data in relation to PNC data quality and timeliness</p>	<p>Achieved</p>	<p>Statistical data in respect of PNC Performance is now produced on a monthly basis and comprises data in relation to Timeliness and Quality. The statistics are distributed to relevant management staff throughout the force.</p> <p>This approach falls in line with the force’s ‘Leaders and Action Programme’ which has been developed to ensure a more rigorous supervision regime. In view of this, the Chief Inspectors are deemed the ‘PNC Champions’ of each BCU and they are responsible for ensuring that failures are dealt with and that staff who contribute to</p>	

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			<p>failures are held to account.</p> <p>In addition, PNC performance is also raised during monthly meetings between the ACC and the BCU Commander.</p> <p>HMIC considers this to be good practice.</p>	
3	<p>Her Majesty’s Inspector of Constabulary recommends that South Yorkshire Police expand its QA processes to ensure that all updates and all members of staff have their work checked on a dip sample basis.</p>	<p>Not Achieved</p>	<p>During the re-visit to the force, HMIC were informed that formal quality control is only taking place against court result updates. This is in the form of dip sampling approximately 30% of the updates.</p> <p>With regards to Arrest/Summons updates, these are applied to PNC direct from the PNC Case Registration System (PCRS) which draws the information from the force custody system before sending it to PNC. Whilst HMIC auditors acknowledge that some of this information is subject of quality control by PNCB staff, for example, MO’s, anecdotal evidence was provided to suggest that data quality is an area where the force needs to focus attention to improve quality at every stage of the update process.</p> <p>HMIC Auditors are of the opinion that improvements in quality will only be achieved with cultural change of all staff in their attitudes towards electronically held data. There is a need to develop a ‘right first time’ approach to data entry to ensure efficient and accurate recording of information.</p>	

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4	<p>Her Majesty’s Inspector of Constabulary recommends that the Force formally documents a strategy for PNC. The document should be supported by an action plan covering the recommendations of this report and any previous HMIC reports where no or limited progress has been made.</p>	<p>Partially achieved</p>	<p>A previous update to the force action plan indicated that the Force Strategy has been produced and is held on the Force Intranet. At the time of the inspection, the strategy was almost 12 months old and HMIC auditors were informed that it is currently being reviewed.</p> <p>A regular review of the strategic position is recognised as good practice to ensure that aims and objectives remain current and also that they remain deliverable within any resource constraints.</p>	
5	<p>Her Majesty’s Inspector of Constabulary recommends that South Yorkshire Police:</p> <ul style="list-style-type: none"> • Introduces a process to ensure that movers and leavers have their access amended or removed from the system as appropriate; • Introduces an independent audit, at least annually, of all user access administration. 	<p>Partially Achieved.</p>	<p>HMIC Auditors were informed that there have been some improvements in this area, however, there is concern that the force remains open to risk.</p> <p>Staff who leave the force are subject of an exit questionnaire. This form now includes reference to PNC access and if staff reply with a positive, the information is sent to the PNCB for removal of their access rights. HMIC Auditors are satisfied that this process will provide the necessary safeguards for the force in respect of staff leaving the force.</p> <p>With regards to staff who move within the force, the situation remains that there is no formal process in place to ensure that all ‘movers’ have their access reviewed when they change roles within the force. This was highlighted by a recent audit carried out by Data Protection staff which resulted in 200</p>	

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			<p>staff from a total of 1700 (12%) having their access removed.</p> <p>The audit carried out by Data Protection was commissioned as a one-off exercise.</p> <p>HMIC Auditors recommend that the force ensures that an annual audit is built into an auditing strategy and that the force ensures that a suitable process is in place to manage the access to PNC of staff who change roles within the force.</p>	
6	<p>Her Majesty's Chief Inspector of Constabulary recommends that the Force reviews its transaction monitoring procedures to ensure that a robust process is in place to detect misuse/abuse of the PNC.</p>	<p>Achieved</p>	<p>HMIC Auditors were pleased to note that the process for transaction monitoring has improved, to provide both an efficient process and also the ability to check a higher volume of transactions.</p> <p>The process is now electronic with transactions selected at random and request for verification being sent electronically via e-mail. The responses must be returned to Data Protection via a line supervisor. The change in process has enabled the force to treble the volume of checks made.</p>	
7	<p>Her Majesty's Inspector of Constabulary recommends that the Force:</p> <ul style="list-style-type: none"> • Ensures that sufficient data protection auditing is undertaken of the PNC; • Satisfies itself that there are suitable accountability mechanisms in place to ensure that data protection 	<p>Not Achieved</p>	<p>Since 2005, the force has only conducted one formal audit of PNC data. This was in relation to entries on the Wanted/Missing index. In addition to this, the only other audit has been the recent review of PNC Users mentioned above.</p> <p>HMIC Auditors are concerned at the lack of</p>	

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	<p>recommendations are implemented.</p>		<p>auditing that has taken place. During the re-visit, HMIC Auditors were informed that a risk based audit plan is being developed which will include provision for audit of PNC data. However, it was also discovered that despite the development of the plan, the current limited resources will be unable to meet the plan.</p> <p>HMIC Auditors recommend that the force urgently reviews the current arrangements for data protection auditing.</p> <p>With regards to the accountability in respect of the audit recommendations, HMIC Auditors were unable to confirm that this has taken place because no formal audit report was complete at the time of the re-visit. However, they were informed that the Data Protection Officer is a member of the PSG and therefore, a mechanism should exist to ensure all recommendations are dealt with accordingly.</p>	
<p>8</p>	<p>Her Majesty’s Inspector of Constabulary recommends that the Force updates it System Security Operating Procedure to include a section on the PNC.</p>	<p>Achieved with Proviso</p>	<p>The System Operating Procedure (SyOps) has been updated and is now an appendix of the PNC Strategy. HMIC Auditors are satisfied with this development, however, they are also of the opinion that the whilst this is a positive mood and reflects the principle of the recommendation, the force must also ensure that suitable reference is made to the SyOps within the overarching Force Information Security Policy.</p>	

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9	<p>Her Majesty’s Inspector of Constabulary recommends that the Force publishes and implements a Communication Strategy to raise awareness for the effective use of PNC across the Force.</p>	<p>Achieved with Proviso</p>	<p>HMIC Auditors were impressed by the level of activity in respect of the marketing of PNC within the force. A marketing strategy has been produced which is available for viewing via the Force Intranet.</p> <p>Furthermore, it was clear during interviews and focus groups that the levels of awareness have increased and that the force has been active in this area. PNC Staff have written and delivered presentations during ‘Street Skills’ workshops. These workshops are held during training days that occur within the shift pattern of operational officers.</p> <p>As a result, anecdotal evidence was provided to indicate that the number of enquiries by officers in relation to VODS and QUEST have increased. There was also a perception amongst PNC operators that officers were making more intelligent requests based upon their improved knowledge.</p> <p>Nevertheless, further improvements were identified during the re-visit. Some officers were still unaware of 24 hour timeliness target for arrest/summons and knowledge of ViSOR amongst operational staff was considered to be vague.</p> <p>At the time of the re-visit, the cycle of presentations in the Street Skills workshops was coming to a close,</p>	

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			<p>therefore, HMIC Auditors recommend that the force evaluates the success of this process and develop plans to ensure that levels of knowledge can be maintained, with the emphasis being placed on gaps that have been identified during this re-visit.</p>	
<p>10</p>	<p>Her Majesty’s Inspector of Constabulary recommends that the Force:</p> <ul style="list-style-type: none"> • Introduces post training evaluation after trainees have had the opportunity to put the training into practice and; • Introduces mandatory re- assessment for PNC operators with refresher training to be provided to any candidate who fails a re- assessment; • Considers, if needs cannot be met internally, the introduction of reciprocal training arrangements with nearby Forces for specialist PNC courses to address the training needs of the PNCB. 	<p>Partially Achieved with a proviso</p>	<p>A scoping exercise has been carried out by Performance Development within the force to determine the benefits and logistics of introducing post training evaluation. A report has been compiled and presented to the PSG for consideration, with a view to introducing a process in the near future.</p> <p>With regards to re-assessments of staff, the force has now implemented mandatory re-assessments for all staff who have not logged on to the system in over 6 months. Success during the assessment, i.e. achieving a pass mark of 75% or more, will result in continued access to the system. Failure will result in additional training on a modular basis, depending on the severity of the failure, or a full refresher training course. HMIC Auditors consider this be good practice.</p> <p>The force has also introduced reciprocal arrangements with West Yorkshire Police to assist in the training of staff. This arrangement is used to support ‘Names Update’ training because the low turnover of staff within the bureau often results in long delays obtaining courses. However,</p>	

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			<p>despite the current arrangement being in place, it was reported that one member of staff within the bureau has been in post for over 2 years and is yet to receive the full compliment of skills required to fulfil the role.</p> <p>HMIC Auditors recommend that the force continues with plans to implement post training evaluation and also ensure that the reciprocal arrangement with West Yorkshire Police is used to its full advantage. Alternatively, the force should consider arrangements with additional forces to ensure flexibility in receiving training for the staff.</p>	
11	<p>Her Majesty’s Inspector of Constabulary recommends that the Force reviews its processes for the full update of A/S records to ensure that all PNC records are complete, accurate, timely, and that the force complies with the Code of Practice.</p>	Not Achieved	<p>Statically, the force regularly achieves the performance target of 90% within 24 hours. However, it was perceived within the force that whilst timeliness is being achieved, the quality of information could be improved.</p> <p>Initial creation of an Arrest/Summons (A/S) report is via electronic transfer of data from the force custody system, supplemented by additional descriptive data that is completed online by the arresting officer. However, the supplementary information is often of poor quality and electronic forms have to be returned to the officer to ensure that better data is received. This is particularly in relation to MO data. Staff reported that backlogs of these forms are building up due to the number of forms that are being returned.</p>	

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			<p>Furthermore, HMIC Auditors were informed that any transmissions that fail on the interface are simply corrected by PNCB staff and re-sent to PNC. No analysis of the errors is carried out and therefore, process improvements are not being made. HMIC Auditors are of the opinion that this is causing inefficiencies within PNCB and holding staff more accountable at the front end of the process will resolve the problem of poor quality data being submitted.</p> <p>HMIC Auditors recommend that all errors made by operational staff are collated/analysed and included in the current suite of data provided to BCU commanders on a monthly basis.</p>	
12	<p>Her Majesty’s Inspector of Constabulary recommends that the Force investigates electronic solutions for the provision of magistrates court results to the PNCB. In the interim a review of the paper flow within the internal mail system should be undertaken to remove unnecessary delays.</p>	<p>Partially Achieved</p>	<p>The force has continued in dialogue with the courts concerning the delivery of post court data to the police. Sheffield court now delivers the results electronically but Doncaster, Rotherham and Barnsley are still as hard copy. However, the timeliness of delivery of these results has improved.</p> <p>At the time of the re-visit, the force was awaiting the implementation of Libra into the courts within the force area, therefore, HMIC Auditors are of the opinion that any development should be limited to the improvement of current practices until Libra is installed. The estimated date for implemented is December 2007.</p>	

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13	Her Majesty's Inspector of Constabulary recommends that South Yorkshire Police implements processes to ensure that officers are held accountable for the submission of complete data for PNC.	Not Achieved	<p>This recommendation was originally made due to the lack of monitoring in place to ensure that all CID9 forms were submitted for all commencement of proceedings that were issued outside of the custody environment, known as non-custody cases.</p> <p>During the re-visit, HMIC Auditors found that there had been little improvement in this process because staff in the PNCB were unable to check whether all forms had been submitted. Officers are required to fax a copy of the form to the PNCB for update to PNC, but, invariably, the first indication that a form failed to be submitted was when a person appeared on a court register.</p> <p>Whilst the volume of these cases is negligible compared to the custody cases, the force should ensure that all relevant forms are submitted in a timely manner.</p> <p>HMIC Auditors recommend that under the Leadership and Action Programme that has already been developed, the force should consider what options are open to ensure that all commencement of proceedings are captured and reported to PNCB within the target time.</p>	
14	Her Majesty's Inspector of Constabulary recommends that the Force makes preparations to implement the national policy decision in relation to driving licences.	Achieved	Following the last inspection, the force has developed specific training courses for PNCB staff. Since then, the #DL, the transaction used to access driver licence information, is now included in all relevant PNC training courses.	

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			<p>Furthermore, the force is currently evaluating the Driver Validation Service provided by DVLA which will enable a web-based search of driver licence information, outside of PNC.</p>	
<p>15</p>	<p>Her Majesty's Inspector of Constabulary recommends that the Force ensures that resources are available to meet demand for the provision of PNC checks to officers.</p>	<p>Achieved with Proviso</p>	<p>HMIC Auditors were pleased to be informed that there were no longer any significant delays when requesting PNC information from either the control room or the PNCB. HMIC Auditors viewed this as a positive step.</p> <p>However, staff did report the inefficiencies of having to contact separate department depending on the data that was required. If vehicle checks are required, officers must contact the control room. For names enquiries, all requests should go via the PNCB. Despite this, it was noted however, that if an officer required vehicle AND names enquiries, both would be carried out by one location.</p> <p>The outcome of having to contact two separate departments is that officers have two separate telephone numbers that they must be aware of and anecdotal evidence was available that it can cause confusion.</p> <p>HMIC Auditors recommend that the force examines methods of streamlining this process to ensure officers can access the information more efficiently. Option were provided to PNCB</p>	

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16	<p>Her Majesty’s Inspector of Constabulary recommends that the Force implements procedures to review outstanding prosecutions on a continuous basis.</p>		<p>Management during the re-visit.</p> <p>Currently the force uses a number of different systems to manage outstanding IP’s.</p> <p>1) Cases passing through custody are researched by the bureau and the outstanding IP actioned. 2) The Daly Activity File (DAF) is checked for outstanding cases. 3) The PNC Bureau is involved in the warrant review process ensuring cancellations are circulated as appropriate.</p> <p>These pro-active reports, whilst good practice may not identify old IP’s for which there is no activity. The implications of this are that if there is an error made in the pro-active system the IP could be overlooked, possibly for many years.</p> <p>NPIA can supply upon request a complete list of outstanding IP’s to a force in the form of an Excel spreadsheet. As a start, the force should be in a position to validate the 209 IP’s currently outstanding prior to January 2006. This should be continued to validate all IP’s over a year old.</p>	