



SUFFOLK CONSTABULARY

6 – 10 JUNE 2005

**POLICE NATIONAL COMPUTER
COMPLIANCE REPORT**

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1. Executive Summary

1.1 Introduction

- 1.1.1 Her Majesty's Inspectorate of Constabulary (HMIC) conducted a Police National Computer (PNC) Compliance Inspection of Suffolk Constabulary between 6th and 10th June 2005.
- 1.1.2 The Constabulary was subject to a PNC Compliance Audit using the April 2003 Protocols on PNC Compliance. Her Majesty's Inspector would like to acknowledge the enthusiasm of the Force and also to place on record his thanks to all members of staff who contributed to this report and provided assistance during the inspection.
- 1.1.3 This report is based on views and comments obtained from strategic, PNC and customer level management and users at Force Headquarters and at 2 of the 3 Basic Command Units (referred to as 'Areas'). 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 Suffolk Constabulary consists of three territorial divisions, Eastern, Western and Southern, which are each divided into sectors, with boundaries matching those of local district or borough councils. It is responsible for policing an area of 939,510 acres, with a resident population of around 669,400. The county is renowned for its scenic beauty and heritage coastline, which attracts many visitors to the area. The strategic location of Felixstowe harbour, the largest container port in the UK which builds an economic connection to mainland Europe, make the road network of the A12 and A14 extremely busy with commercial traffic.
- 1.2.2 The Force is headed by the Chief Officer Team comprising the Chief Constable, Deputy Chief Constable, an Assistant Chief Constable and an Assistant Chief Officer. In terms of staff numbers Suffolk Constabulary employs around 1300 police officers, 800 police staff and 275 special constables. The Force Headquarters is based at Martlesham Heath on the outskirts of Ipswich. This is largely an administrative centre and is home to the Force's switchboard, control room, crime management, traffic and training departments.
- 1.2.3 The PNC Bureau (PNCB) is located at Force Headquarters and comprises 3 staff. It operates between the hours of 7am and 11pm Monday to Friday and is responsible for updating wanted/ missing reports, disqualified drivers, vehicle information reports and PNC Broadcasts. The PNCB also provides specialist PNC services to the Force such as Vehicle On-Line Descriptive Searches (VODS) and Queries Using Extended Search Techniques (QUEST). Out of office hours, the Force Control Room assumes the responsibilities of the PNCB.
- 1.2.4 The creation of Arrest/ Summons records at Suffolk is a semi-automatic process which requires the arresting officer to fax to the local Criminal Justice Unit (CJU) a source input document (known locally as the '190N'). CJU staff creates a record on the local Criminal Intelligence System (CIS) which contains all the data required for a full PNC record

to be created. Once the CJU staff member has completed the record on CIS there is the option to send the record to PNC. Upon selection of this option a full record is transmitted across the interface. The CJUs operate from 7am to 7pm 7 days a week. There are three CJUs in Suffolk which are located on the Areas but are a central resource.

- 1.2.5 Magistrates court results are also updated by the Area CJUs whilst crown court results are updated by the Trials Unit located in Ipswich. Paper court registers are received daily from the courts which the CJU staff input to CIS for transmission to PNC.

1.3 Methodology

- 1.3.1 A full inspection against the 2003 PNC Protocols was carried out, covering the sections of Leadership, Policy and Strategy, People, Partnerships and Resources, Processes and Results.

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

- **Excellent** – Comprehensive evidence of effective activity against all protocol areas.
- **Good** – Evidence of effective activity in many areas, but not comprehensive.
- **Fair** – Evidence of effective activity covering some areas, but concerns in others.
- **Poor** – No or limited evidence of effective activity against the protocol areas, or serious concerns in one or more area of activity.

- 1.3.3 The first stage of the inspection involved the force providing HMIC Auditors with documentation to support its adherence to the protocols. This was followed up by a visit to the Force with HMIC Auditors conducting numerous interviews with key staff. The visit to the Force also incorporated the final stage of the inspection, which was based upon reality checks. The reality checks included reviewing PNC data against source documents and a review of PNC policy documentation.

- 1.3.4 Using the evidence gathered during each stage of the inspection, this report has been produced based upon the European Foundation of Quality Management (EFQM) format.

1.4 Current Performance

- 1.4.1 On 27th April 2000, ACPO Council endorsed the ACPO PNC Compliance Strategy. The strategy is based upon the following four aspects of data handling:

- Accuracy
- Timeliness

- Completeness
- Relevancy

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

1.4.3 On 1st January 2005, the performance indicators of the ACPO Compliance Strategy were replaced by the timeliness standards contained within the newly published Code of Practice for the PNC. The PNC Code of Practice, developed by the National Centre for Policing Excellence and endorsed by ACPO, is a statutory code made under s.39a of the Police Act 1996 (inserted by section 2 of the Police Reform Act 2002). It provides scope for the Home Secretary to invoke statutory intervention for forces failing to comply. With regards to individual forces, a number of performance indicators (PIs) specifically for PNC data standards were set. Each force has a responsibility to achieve the standards set within the Code of Practice. The timeliness standards within the Code are as follows:

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

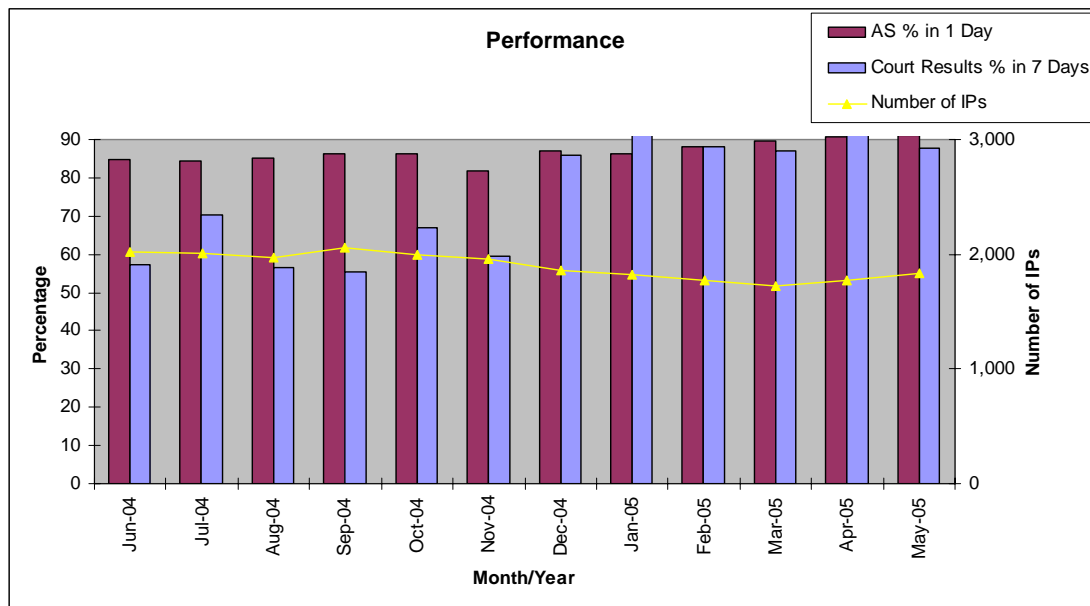
1.4.4 In May 2005, Suffolk Constabulary input 90.8% of Arrest/ Summons (A/S) updates on PNC. This shows an improvement in performance in the 12 months to May 2005 from 73.2% in June 2004. Whilst such an improvement is to be commended it is difficult to gauge to the Force's actual performance on a national level. This is due to the fact that the majority of forces update the PNC with persons given police bail and the process date input to PNC (from which the 24 hours figure is calculated) is the date of arrest. In Suffolk's case, persons released on police bail are not input on the PNC until they are charged. As a result, Suffolk is not complying with the Codes of Practice for PNC. If Suffolk were to continue processing records at the point of charge, the date of arrest should be input as the process date which would clearly have a negative effect on their performance statistics.

1.4.5 Suffolk's performance in terms of court results is impressive, as displayed in the PITO statistics. The Force has shown a consistent improvement in the 12 months to May 2005. In June 2004 the Force entered 55.3% of results within 7 days of the court date. This has risen to 93.5% being updated within 10 days of the court date in May 2005

which places the Force in the top quartile in England and Wales. The number of days to input 50% of court results has also improved from 20 days in June 2004 to 5 days in May 2005. The Force is therefore in a comfortable position to meet the revised target of 75% of cases being entered within 10 days from 1 July 2005.

1.4.6 In terms of Impending Prosecutions (IPs) Suffolk has shown a reduction of 9.63% in the 12 months to May 2005. This is compared to the volume of Arrest/ Summons records input which has remained stable throughout the period. Therefore, HMIC Auditors are satisfied that Suffolk Constabulary is managing its outstanding impending prosecution records on the PNC.

1.4.7 A graph illustrating Suffolk Constabulary’s performance in the 12 months to May 2005 is shown below:



1.5 Conclusions

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

Fair – Evidence of effective activity covering some areas, but concerns in others.

1.5.2 This assessment is based on the detailed findings of the report which highlight concerns in several areas of activity. In particular, at the time of inspection the Force was not complying with the Codes of Practice which state that 90% of recordable offences should be 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. Further concerns were raised with regard to system security and inappropriate use of some PNC records for investigative purposes.

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

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

1.5.5 A summary of good practice points, along with recommendations for improvement can be found at Appendices A and B of this report.

2. Detailed Findings and Recommendations

2.1 Leadership

2.1.1 Role of the PNC Steering Group

2.1.1.1 Up to the time of the inspection, the PNC Steering Group (PSG) had been chaired by the Assistant Chief Constable at Suffolk. However, at the PSG meeting prior to the inspection it had been agreed that subsequent meetings would be chaired by the Head of Criminal Justice Services.

2.1.1.2 In addition, HMIC Auditors found that whilst membership of the PSG included all relevant stakeholders, attendance at the meetings had been variable. The result was that some stakeholder groups had not been represented at a PSG in the previous 12 months.

2.1.1.3 A number of earlier reports by Her Majesty's Inspector of Constabulary, including the thematic report 'On The Record' highlighted the crucial role of chief officer involvement on PNC Steering Groups. This was, in fact, one of the few areas of consistency in forces who were seen as performing well in earlier inspections and its importance cannot be over-emphasised. It is therefore important that the Force satisfies itself that a strategic outlook is able to be maintained and that all stakeholders are represented at the meetings.

Recommendation 1

Her Majesty's Chief Inspector of Constabulary recommends that the Force ensures that the strategic position of the PSG is maintained and all stakeholders represented at PSG meetings.

2.1.2 Responsibility and Accountability

2.1.2.1 Suffolk Constabulary has established processes to ensure that individual officers are held accountable for the quality of information they submit for input to the PNC. Focus groups demonstrated that officers are aware of their responsibilities in submitting complete, accurate and timely data. This is viewed as good practice by HMIC Auditors.

2.1.2.2 In addition, the PNCB supplies monthly performance information to each Area Commander showing the quality and timeliness of data supplied by the Area to PNC. This performance information, however, does not distinguish between time delays caused by officers not submitting information and delays caused by the Criminal Justice Units. Since the CJUs are a central rather than a divisional resource, Area Commanders are being held accountable for an area of activity over which they have no control.

Recommendation 2

Her Majesty's Chief Inspector of Constabulary recommends that the Force improves its monthly performance data to clearly hold accountable the Areas and central resources.

2.2 Policy & Strategy

2.2.1 PNC Policy and Strategy

2.2.1.1 HMIC Auditors were provided with a copy of the Force's Strategy for PNC. This document outlines the Force's aims with regard to PNC and states how these aims are to be achieved. Having such a document in place is established good practice.

2.2.1.2 In addition, the Force has established policies with regard to the PNC. Meetings and focus groups showed that officers and staff are aware of such policies and are held accountable if they fail to adhere to them. Again this is regarded as good practice.

2.2.2 PNC Security

2.2.2.1 With regard to system security, HMIC Auditors reviewed five key areas. These are User Access, Transaction Monitoring, Data Protection Auditing, the Role of Professional Standards and the Role of the Information Security Officer. Each of these is discussed further below and raised some areas of good practice but also some areas of concern.

2.2.2.2 Access to the PNC can be either via a Direct Connect Terminal (DCT) or via the local Criminal Intelligence System (CIS). Access via DCT is managed by the PNC Manager who retains a list of all active users on

the system and makes necessary amendments for movers and leavers, as appropriate. Whilst HMIC Auditors do not question the integrity of the work of the PNC Manager, there is some risk to the organisation in having an individual able to make such changes to system access in terms of both the resilience of the process and in that the Force has not independently audited the function being carried out.

- 2.2.2.3 Access to the PNC via the CIS is managed by the IT User Support department at Suffolk. A new user is created upon receipt of an email from the Training Department which confirms that an individual has successfully completed a PNC course. However, the way in which access via CIS is configured means that regardless of the training received, a person given access to PNC via CIS will be given access to all PNC transactions including all vehicle, property and names record transactions. There is therefore a risk that an individual who has received training on the vehicles application only can also access names records and may misinterpret the data resulting in an inappropriate course of action being taken. Furthermore, IT User Support have no process defined to ensure that all officers and staff who leave the organisation or change roles thus no longer requiring access in fulfilment of their duties have their access to PNC deleted.

Recommendation 3

Her Majesty's Chief Inspector of Constabulary recommends that Suffolk Constabulary:

- **Satisfies itself that there is sufficient resilience to ensure that DCT users can be added and removed from the system;**
- **Reviews the PNC user groups in relation to access via CIS to ensure that access can be restricted to parts of the system for which training has been received;**
- **Introduces a process in IT User Support to ensure that movers and leavers have their access removed from the system as appropriate;**
- **Introduces an independent audit, at least annually, of all user access administration, both via DCT and via CIS.**

- 2.2.2.4 Transaction monitoring is a requirement of the ACPO Data Protection Audit Manual. It is a process where police officers and staff are asked to verify their reasons for performing transactions on the PNC and, as such, is an important activity in the prevention and detection of misuse or abuse of the PNC. At Suffolk this is function of the Information Compliance Unit who selects at random six transactions per day for verification. A standard pro forma is emailed to the officer or member of staff requesting evidence of the reason for the check, e.g. an incident log reference. However, due to the large number of responses which are unable to provide evidence, not all such cases are followed up by the Information Compliance Unit (ICU). Therefore, the effect of transaction monitoring as a detective control to identify misuse/ abuse of the system is minimised and the only effect is deterrent.

Recommendation 4

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.

- 2.2.2.5 Data Protection Audits are also conducted by the ICU at Suffolk. The department performs an annual risk assessment of its IT data systems in order to produce an Audit Plan in accordance with the guidance contained in the ACPO Data Protection Audit Manual. The Unit has one auditor and the Head of Department reports to the Head of Criminal Justice Services. This clearly compromises the independence of the ICU in its audit work as the Head of Criminal Justice Services is responsible for ensuring that recommendations in relation to PNC applications are actioned. Therefore the operational lead for the PNC at Suffolk also has responsibility for policing the system. Furthermore, the reviews are not process based and only provide a physical check of what is held on the system without ascertaining which process issues may have led to discrepancies. In the current climate post Bichard Inquiry, it is imperative that forces ensure that data protection issues identified are rectified as a matter of priority

Recommendation 5

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

- **Considers the current position of the ICU within the organisation and;**
- **Reviews its audit procedures to ensure that all relevant issues affecting data quality can be identified.**

- 2.2.2.6 HMIC Auditors also reviewed the role of the Professional Standard Department (PSD) with regard to PNC issues at Suffolk. The PSD is independent of operational activities, sitting within the Human Resources Department. Such independence is viewed as good practice. In addition, the PSD has defined relationships with the ICU

and the Information Security Officer which ensures that PSD is notified of any breaches of system security and the PSD has PNC trained operators to enable them to conduct investigations involving PNC activity.

- 2.2.2.7 Finally with regard to PNC system security, HMIC Auditors reviewed the role of the Information Security Officer (ISO). In particular, IT Security Policy documentation was reviewed and the role of the ISO at a strategic level was considered. HMIC Auditors were disappointed to note that the ISO is not a regular attendee at the Force PNC Steering Group and that the Force's IT System Security Policies being used were nationwide policies, with no reference to Suffolk's own policies or procedures. An absence of local policies may result in officers and staff not fully understanding their own roles and responsibilities in relation to information security and the absence of the ISO from the PSG could result in information security issues not being fully discussed at a strategic level.

Recommendation 6

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

- **Adapts the national Information Security Policies to local needs, ensuring that the roles and responsibilities of each individual are clearly explained and;**
- **Invites the ISO to be a member of the PSG.**

2.3 People

2.3.1 Marketing and Awareness

2.3.1.1 During meetings and focus groups, HMIC Auditors were pleased to note a general awareness among officers and staff of the PNC and its functionality as an aid to operational policing. The Force regularly invites PITO to provide presentations on PNC and this has been supported by information on posters and the Force Intranet.

2.3.1.2 HMIC Auditors noted some opportunities to build on this general awareness to ensure that all officers are aware of enhanced applications such as Vehicle On Line Descriptive Searches (VODS) and especially Queries Using Extended Search Techniques (QUEST). For example, a site on the Intranet dedicated to PNC could provide valuable information about enhanced searches, examples of when such searches could be used and where to obtain them. Furthermore, Area Training Days which are built into the current shift pattern could be used to provide presentations and demonstrations of such facilities.

2.3.2 PNC Training

2.3.2.1 PNC Training was a further area at Suffolk where opportunities to improve were identified by HMIC Auditors. Suffolk has two accredited PNC trainers who plan courses bi-annually. The plan is publicised on the Intranet and Area Training Officers allocate individuals to places based on training needs analysis. Refresher courses are included within the plan. At the end of each course, the trainee must sit an assessment and must obtain 80% to be given access to the PNC. This is viewed as good practice. Furthermore, each candidate is asked to complete a "Happy Sheet" to rate the course, its content, the training facilities and the trainer, as a form of training evaluation. However, no post training evaluation is conducted, for example three months after the course, which would assist in training design through an evaluation of whether the course provided the trainee with the correct tools/ information back in the workplace.

2.3.2.2 Whilst refresher training is provided the current uptake is low. Therefore, there are PNC users at Suffolk who were trained to use the system 15 years ago who have received no training since 1990. The PNC and its applications have changed considerably since this time, with new functionality having been added, such as driving licence and insurance information, to which these users have access but have had no formal training.

Recommendation 7

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

- **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.**

2.4 Partnerships and Resources

2.4.1 Update of court results

2.4.1.1 Magistrates court results are updated by the Criminal Justice Units (CJUs) and crown court results by the Trials Unit. The Trails Unit is co-located with the Crown Prosecution Service in Ipswich. The Trials Unit currently receive manual court results via the Force's Crown Court Liaison Officer, who also provides a daily list of all cases which have been decided to enable the Trials Unit to chase any delayed results. Magistrates and crown court results are input to the CIS which transmits the data to PNC. However, results can be input directly on the PNC if transmission via CIS is not possible.

2.4.1.2 The introduction of the Trials Unit in 2002 is generally viewed at Suffolk as being a positive step, enabling better communication between the Force, the court and the CPS. In addition, the Trials Unit provides monthly management information on its performance to the Head of Administration of Justice and is thus held accountable for its own performance and is able to escalate any issues being experienced by its partners.

2.4.2 Non Police Prosecuting Agencies

2.4.2.1 Under national agreements police forces are responsible for updating the PNC with data from Non Police Prosecuting Agencies (NPPAs). In order to ensure that PNC records are complete, accurate and up to date forces need to introduce arrangements to ensure that all NPPA information is received in a timely manner and that the data received is of the quality expected from its own officers and staff.

2.4.2.2 At the time of the inspection, Suffolk Constabulary had no formal agreements in place with its local NPPAs which would improve the timeliness and quality of data.

Recommendation 8

Her Majesty's Chief Inspector of Constabulary recommends that the Force implement formal service level agreements with its NPPAs to ensure the integrity of PNC records.

2.5 Processes

2.5.1 Compliance with the Codes of Practice

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 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 At the time of the inspection, Suffolk Constabulary was failing to comply with the Codes as not everyone arrested, reported or summonsed was being recorded on PNC. For example, cases that are subject to police bail are not recorded until a person is charged. In addition the Force does not record any pre or post charge bail conditions on the PNC. This is due to the fact that there are problems with the Force updating such data through an interface. It is therefore possible that officers in other forces are checking records on the PNC which do not include the most up to date information of recent arrests and other vital details which may assist in the custody sergeants' decision-making process. The

Force is also losing the opportunity to retain DNA and fingerprints on the national database since it is not possible to retain information on these databases without a supporting Arrest/Summons number.

- 2.5.1.3 HMIC Auditors were encouraged that the Force had plans in place to capture this data and a phased roll out was scheduled to commence on 1 July 2005 to be completed by the end of the year across the Force.

Recommendation 9

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

- **Implements its plans to record all arrestees within 24 hours of the commencement of proceedings as soon as possible;**
- **Implements the update of bail conditions on the PNC.**

- 2.5.2 Input of Warning Signals

- 2.5.2.1 HMIC Auditors conducted checks of 22 records on PNC by comparing the system record to the source input document. In two cases there was no warning signal on the record despite the fact that the records showed a history of violent and sexual offences. Warning Signals exist on the PNC so that officers can be alerted that someone may be of danger to themselves, to the officer or to the public. As such, it is imperative that such information is updated on the PNC.

- 2.5.2.2 Responsibility for ensuring that warning signals are input to PNC lies with the officer in case who submits the source input document. However, CJU staff and the Trials Unit do not check that all relevant warning signals have been applied and CJU staff does not question the officer if the officer has not requested that a warning signal be applied.

Recommendation 10

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

- i) **Instructs CJU staff to record details of warning signals where the offence and/ or previous history provides the justification.**
- ii) **Extends the quality control checks conducted by the Trials Unit to ensure that appropriate warning signals have been applied to the most serious cases.**

2.5.3 Use of driving licence and insurance data

2.5.3.1 During the inspection HMIC Auditors obtained anecdotal evidence that officers were using driving licence and insurance information for investigative purposes. However, the national agreement in place for the provision of this information from DVLA and the insurance companies imposes a restriction on police use of this data. This prohibits its use for investigative purposes unless the Force applies for an exemption from DVLA.

2.5.3.2 In addition, HMIC Auditors noted that all operators who have access to the PNC via the CIS are able to view driving licence and insurance data. In order to prevent inappropriate disclosure of this information, it would be prudent to restrict access to these parts of PNC.

Recommendation 11

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

- **Ensures that all officers and staff are aware of the restrictions surrounding driving licence and insurance information;**
- **Reviews user access to the PNC via CIS in order to restrict who has access to this data.**

2.5.4 Communications

2.5.4.1 In office hours (7am to 11pm) the PNCB update all Wanted/Missing and stolen vehicle reports on the PNC. Outside office hours these tasks are performed by the Control Room. As a result of Control Room operators only performing these updates on a limited basis, operators reported that there was apprehension when updates were required with the result that work often took longer and was more prone to error.

2.5.4.2 Some Control Room operators at Suffolk are also trained to conduct VODS searches on the PNC. At one time there was at least one trained VODS operator per shift. However, due to staff turnover this has been greatly reduced with the result that officers are not always able to obtain such searches upon request. This may hamper an investigation and could also reduce officers' confidence in the system if the checks they request are unavailable.

Recommendation 12

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

- **Reviews its processes for PNC updates to ensure that it is gaining most efficient use of resources and;**

- **Ensures that there are sufficient operators trained to conduct complex searches to meet officers' demands.**

2.5.5 Ad hoc intelligence updates¹

2.5.5.1 Suffolk Constabulary captures ad hoc intelligence updates on the local CIS system. Such updates are automatically transferred to the PNC thus ensuring that PNC records are complete, accurate and up to date. HMIC Auditors commend the Force for taking steps to ensure that all relevant information is input to PNC.

2.6 Results

2.6.1 In terms of Arrest/ Summons (A/S) updates Suffolk has shown an improvement in performance in the 12 months to May 2005. In June 2004 the Force was inputting 73.2% of records within 24 hours, rising to 90.8% in May 2005. Whilst such an improvement is to be commended it is difficult to gauge to the Force's actual performance on a national level. This is due to the fact that the majority of Force's update the PNC with persons given police bail and the process date input to PNC (from which the 24 hours figure is calculated) is the date of arrest. In Suffolk's case, persons released on police bail are not input on the PNC until they are charged. Reality checks conducted by HMIC Auditors showed that Suffolk input the date of charge as the process date, rather than the date of arrest. As a result, Suffolk is not complying with the Codes of Practice for PNC. If Suffolk were to continue processing records at the point of charge, the date of arrest should be input as the process date which would clearly have a negative effect on their performance statistics.

2.6.2 In terms of court results, Suffolk is in the top quartile of Force's in England and Wales. The Force has shown a consistent improvement in the 12 months to May 2005. In June 2004 the Force entered 55.3% of results within 7 days of the court date. This has risen to 93.5% in May 2005. In May 2005 it took the Force 20 days to input 50% of court results, figure which has been dramatically reduced to 5 days in May 2005. Suffolk Constabulary is therefore complying with the Codes of Practice in this area of activity and the Force is in a comfortable position when the target rises to 75% of cases being entered within 10 days from 1 July 2005.

2.6.3 Finally, with regard to outstanding prosecutions on the PNC, the Force has worked to reduce these in the 12 months to May 2005 from 2,025 in June 2004 to 1,830. In April 2001, HMIC stated that all forces should be in a position to confirm that any outstanding case that is over twelve months old, is legitimately outstanding. The ongoing work conducted by Suffolk and the corresponding reduction in outstanding cases assures HMIC Auditors that the Force is managing this aspect of PNC data.

¹ Information applicable for update to PNC that originates from a source other than the creation of an Arrest/ Summons report.

APPENDIX A – SUMMARY OF RECOMMENDATIONS FOR SUFFOLK**Recommendation 1**

Her Majesty's Chief Inspector of Constabulary recommends that the Force ensures that the strategic position of the PSG is maintained and all stakeholders represented at PSG meetings.

Recommendation 2

Her Majesty's Chief Inspector of Constabulary recommends that the Force improves its monthly performance data to clearly hold accountable the Areas and central resources.

Recommendation 3

Her Majesty's Chief Inspector of Constabulary recommends that Suffolk Constabulary:

- Satisfies itself that there is sufficient resilience to ensure that DCT users can be added and removed from the system;
- Reviews the PNC user groups in relation to access via CIS to ensure that access can be restricted to parts of the system for which training has been received;
- Introduces a process in IT User Support to ensure that movers and leavers have their access removed from the system as appropriate;
- Introduces an independent audit, at least annually, of all user access administration, both via DCT and via CIS.

Recommendation 4

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.

Recommendation 5

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

- Considers the current position of the ICU within the organisation and;
- Reviews its audit procedures to ensure that all relevant issues affecting data quality can be identified.

Recommendation 6

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

- Adapts the national Information Security Policies to local needs, ensuring that the roles and responsibilities of each individual are clearly explained and;
- Invites the ISO to be a member of the PSG.

Recommendation 7

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

- 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.

Recommendation 8

Her Majesty's Chief Inspector of Constabulary recommends that the Force implement formal service level agreements with its NPPAs to ensure the integrity of PNC records.

Recommendation 9

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

- Implements its plans to record all arrestees within 24 hours of the commencement of proceedings as soon as possible;
- Implements the update of bail conditions on the PNC.

Recommendation 10

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

- Instructs CJU staff to record details of warning signals where the offence and/ or previous history provides the justification.
- Extends the quality control checks conducted by the Trials Unit to ensure that appropriate warning signals have been applied to the most serious cases.

Recommendation 11

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

- Ensures that all officers and staff are aware of the restrictions surrounding driving licence and insurance information;
- Reviews user access to the PNC via CIS in order to restrict who has access to this data.

Recommendation 12

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

- Reviews its processes for PNC updates to ensure that it is gaining most efficient use of resources and;
- Ensures that there are sufficient operators trained to conduct complex searches to meet officers' demands.

APPENDIX B – SUMMARY OF GOOD PRACTICES AT SUFFOLK

- The Force has processes in place to ensure that ad hoc intelligence data is updated on the PNC.
- The Professional Standards Department is positioned independently from operational policing activities.
- The Force Trainers assess each individual's competency prior to them being given access to the PNC.

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.