ACPO Criminal Record Office (ACRO)

Police National Computer Compliance Report
05 – 07 October 2010

January 2011

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Contents

Executive Summary

1.1. <u>Introduction</u>

1.1.1. At the organisation's request, Her Majesty's Inspectorate of Constabulary (HMIC) conducted a Police National Computer (PNC) Compliance Inspection of the ACPO Criminal Records Office (ACRO) between the 05 and 07 October 2010.

1.1.2. Her Majesty's Inspectors (HM Inspectors) would like to acknowledge the enthusiastic cooperation of the organisation and also to place on record their 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 an extensive pre-read of documents supplied by ACRO, supported by the views and comments of both strategic and operational personnel at the organisation's headquarters. This was supplemented by reality checks conducted by HM PNC Compliance Inspectors.

<u>Background</u>

1.1.4. ACRO originated from the ACPO DNA, Fingerprint and Retention Project, which was supported by Hampshire Constabulary. The organisation moved towards a degree of autonomy when Hampshire Police Authority approved the signing of a five-year lease for its present headquarters at Whiteley.

1.1.5. The Hampshire Chief Constable still retains liability for all ACRO staff, although day-to-day management is the responsibility of the Governance Board, which includes representatives from the Hampshire Police Authority, Home Office, NPIA[1], PSNI[2] and HMIC. The strategic lead is the ACPO Director of Information, currently Mr Ian Readhead.

1.1.6. Business support is supplied by the Hampshire Constabulary, and subject to service level agreements. These are Information Technology, Personnel, Finance, Legal Services and Business and Property Services. ACRO also adheres to Hampshire Constabulary policy in regard to all of its operations except where, due to the specialist nature of its work, it is inappropriate to do so.[3]

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[1] National Policing Improvement Agency
[2] Police Service of Northern Ireland
[3] For example the use of credit card payment in respect of Police Certificates

1.1.7. Internally, managers oversee four portfolios:

- The Bureau
- Criminology and Forensic Research
- UKCA – ECR/ROW[4] Operations and Intelligence
- International Development and Criminal Records

1.1.8. The Bureau provides Police Certificates to individuals applying for a visa to enter certain countries. This certifies whether that person has any criminal history in the UK and if so, what that history is. ACRO issues Police Certificates directly to applicants on behalf of most UK police forces. This portfolio also manages subject access on behalf of most UK police forces, and conducts Back Record Conversion for the disclosure agencies.

1.1.9. ACRO Business Support comprises six distinct areas of work. These are Personnel, Finance, IT, Media and Communications, Office Management and Facilities.

1.1.10. The Criminal Records portfolio provides operational support and advice on matters relating to the management of information on national police systems. This includes the recording, retention and disposal of criminal records on the PNC.

1.1.11. The International Portfolio supports the UK Central Authority for the Exchange of Criminal Records, which obtains, on behalf of police forces and public protection agencies, criminal conviction data from European countries. It also supports conviction exchange outside the EU.

1.1.12. National Operations informs the national ACPO response to current issues affecting the service. The section has recently been involved in the collection of DNA from criminals who have not been previously profiled and in the management of UK sex offenders linked to the Violent and Sex Offenders Database (ViSOR). The portfolio also now includes an Intelligence Unit, which commenced operation in October 2010.

1.1.13. Currently ACRO employs 160 personnel, a total which includes three police officers.

1.1.14. The organisation is based in Whiteley, Hampshire, and has no satellite offices. It has no policing powers but, if such powers are required it is supported by Hampshire Constabulary

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[4] UK Central Authority for the Exchange of Criminal Records /Rest of the World

1.2.   Methodology

1.2.1.   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.

1.2.2.   Although ACRO is affiliated to Hampshire Constabulary on a lead force principle basis, for the purposes of the inspection it was regarded as a non-police organisation. This is primarily because the performance indicators and targets normally associated with a police force are not specifically relevant to ACRO.

1.2.3.   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.

1.2.4.   The first stage of the inspection involved the organisation providing HMIC Inspectors with documentation to support its adherence to the protocols. This was followed up by a visit to the organisation with HMIC Inspectors conducting interviews with key staff. The visit to the organisation 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.

1.2.5.   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.

1.3.   Current Performance

1.3.1.   On 27 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

1.3.2.   The strategy is owned by ACPO but is also reliant on other partners taking responsibility for key actions within the strategy. The partners include the NPIA, HMIC, and individual organisations.

1.3.3.   On 01 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 s.2 of the Police Reform Act 2002). It provides scope for the Home Secretary to invoke statutory intervention for those organisations that fail to comply. With regards to individual organisations, a number of performance indicators (PIs) specifically for PNC data standards were set. Each of the organisations has a responsibility to achieve the standards set within the Code of Practice. The timeliness standards within the Code are as follows:

1.3.4.   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.

1.3.5.   50% of all finalisations being entered onto PNC within seven days of the information being received by the police. This target increased to 75% on 01 July 2005, six months after the commencement of the Code. (Courts have their own target of three days for delivery of data to the police. Therefore, the police are measured against an overall target of 10 days.)

1.3.6.   Due to the nature of the work, the majority of the performance criteria detailed at (1.3.4.) is not directly relevant to this organisation. ACRO is however developing a service to Non-Police Prosecuting Agencies (NPPAs) recording the commencement and result of proceedings on PNC. As these agencies are bound by the performance criteria detailed in (1.3.4) ACRO have some responsibility to support adherence to the standards in this embryonic service. See (6.2.34) for further comment of this issue.

1.3.7.   Whilst there is no independent performance data in respect of ACRO there is no reason to doubt the information supplied, which provides clear evidence that the organisation is achieving and often exceeding the required standards.

1.4.   Conclusions

1.4.1.   HMIC's assessment of PNC compliance within the organisation is:

Excellent – Comprehensive evidence of effective activity against all protocol areas.

Some of the main points are:

•   There is a clearly defined and well understood quality ethic within the organisation.
•   Timeliness objectives are constantly achieved.
•   The organisation is striving to improve quality and timeliness standards nationally and internationally.

1.4.2.   The findings of this report should be 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

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

2. Detailed Findings and Recommendations

2.1.   <u>Leadership</u>

2.1.1.   Mr Ian Readhead as the ACPO Director of Information currently oversees ACRO. However, as he has responsibility for a wider national portfolio, responsibility for the day-to-day running is with Detective Superintendent Gary Linton, who is supported by a manager in each of the business areas. Supt Linton was responsible for the creation of ACRO and has a clear understanding of the current business and the potential for further developments to support the national and international police service.

2.1.2.   Supt Linton encourages a casual yet business-focussed ambience within the organisation, which has resulted in a motivated and productive workforce.

2.2.   <u>PNC Steering and User Groups</u>

2.2.1.   Whilst the Inspection Protocol requires the formation and maintenance of the PNC Steering Group, this is not considered appropriate for ACRO. Representatives of appropriate seniority attend the bi-annual Hampshire PNC Steering Group, and the organisation is represented on regional and national groups linked to its business areas.

2.2.2.   Internally the PNC Working Group meets monthly to discuss local issues. The Group, chaired by the deputy PNC liaison officer, considers internal and external issues that impact upon the use and performance of PNC.

2.2.3.   Minutes of recent meetings supplied to HM Inspectors show evidence of a well-attended group discussing relevant issues.

2.3.   <u>Notification of Senior Management</u>

2.3.1.   The relationship between ACRO and Hampshire Constabulary is good. There is however some concern within the force that, particularly on PNC interface issues, there is insufficient consultation. As ultimate responsibility for PNC interface issues lies with the force it is suggested that ACRO actively involve senior personnel with PNC responsibility (particularly the PNC Bureau Manager) in strategic policy decisions.

2.3.2.   As ACRO staff work at the same location, minor issues that may impact upon performance are raised and resolved in real time. More complex issues are considered and actioned by the PNC Working Group.

2.4.	Timeliness and Quality of Processes

2.4.1.	ACRO process a large volume of applications, which requires a robust quality control regime. HM Inspectors noted a 100% quality check of each operators work by a quality control team who form part of the Police Certificates production process[5]. A summary screen is printed off the PNC to validate the search criteria of each operator. The process uses the 'traffic light' system to indicate the quality of each operator's work. A 5% error rate or less is green, 5-10% amber, and over 10% is red.

2.4.2.	The statistics, showing how each individual and team have performed, are published monthly. Trends are monitored quarterly. Any operator not achieving the required standard is individually mentored by an in-house expert.

2.4.3.	The required and achieved performance standards are recorded in each operator's Personal Development Review (PDR).

2.4.4.	Auditing is undertaken weekly by a designated Head of Section with the results recorded on a spreadsheet. This policy, and any subsequent actions are clearly documented[6].

2.4.5.	These procedures to monitor not only timeliness but quality and to address weaknesses in real time will ensure a good quality service and are considered to be good practice.

2.5.	Communication with Expert Staff

2.5.1.	Day-to-day communication between the operational personnel and staff with professional responsibility are made easier as, unlike a police force, the majority work on the same site.

2.5.2.	Externally, the following specialist services are bought in from Hampshire Constabulary and managed by way of service level agreements:

•	Information Technology
•	Personnel
•	Finance
•	Solicitor Services
•	Business and Property Services

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[5] See Paragraph 6.2.1 for details of the organisations work streams
[6] ACRO Procedures Section (10) v2

2.5.3.   Due to the relatively small size of ACRO this arrangement is the most effective method of delivering these services, an arrangement which brings skills into ACRO and financial benefits to the Force. It is considered to be good practice.

3.   Policy and Strategy

3.1.   Organisational Policy

3.1.1.   A copy of 'ACPO Criminal Records Office Police National Computer Procedures Version 2' (16 September 2010) was supplied to HM Inspectors. This document, which draws from national guidelines and also incorporates local procedures, sets all policy and procedures to be used by ACRO staff in relation to PNC. The document is an easy to understand reference point for all staff and is an example of good practice.

3.1.2.   Any changes to procedures are communicated to staff via personal briefings and e-mail. Attendees at all focus groups were aware of current PNC policy. The Bureau deputy manager chairs a meeting once a month which is attended by representatives from each business area to discuss the impact of any recent changes to PNC. This meeting is also attended by the ACRO PNC liaison officer. Details of all updates are stored locally on the 'Z drive' in a folder specifically designated for PNC issues. The folder also contains the relevant Codes of Practice and manuals. This is supplemented by a newsletter containing updates and other items of interest.

3.2.   Auditing

3.2.1.   Auditing is undertaken on behalf of the Bureau Manager. Six to ten transaction validation requests are generated each week. The validation form is sent to the section head of the individual concerned who then verifies the legitimacy of the query, usually within a week. ACRO has the advantage that, unlike in an operational police environment, all queries are supported by independent documentation. Audit results are recorded on a spreadsheet. No abuse of PNC access has been detected to date; however, there is a mechanism in place for any abuse to be referred directly to Hampshire's Professional Standards Unit.

3.2.2.   The in-house audit regime functions satisfactorily, there is however a lack of independence at the management level – an independence that can only be provided by a supervisory element with the necessary expertise outside ACRO. The organisation may consider introducing this element in consultation with the parent force; however, initial discussions suggest little spare capacity in this area.

Recommendation One

HM Inspectors recommend that the organisation incorporate the expertise of a suitably qualified individual into the audit process to provide an independent oversight at management level.

3.3.   <u>Authority Levels</u>

3.3.1. PNC Access is granted on behalf of the Bureau Manager when the operator successfully completes the PNC training course. The operator is allocated a user group that corresponds with their job role. There was evidence that the user groups had recently been reviewed. User IDs are reviewed after 30 days of non-use and if necessary deleted. There is a mechanism in place for role changes and operators who leave the organisation. Passwords are reset by the appropriate section head. This process of actively monitoring, reviewing and actioning users is good practice.

3.4.   <u>Commencement of Proceedings for Recordable Offences</u>

3.4.1. When compared to an operational police force, the organisation records very few offences. In the six months to the end of September 2010 an average of just of 650 a month were recorded[7]. As the proceedings relate to the work of Non-Police Prosecuting Agencies (NPPAs), ACRO is dependant upon others to supply the information in a timely manner[8].

3.4.2. HMIC Inspectors have been supplied with Data Processing Agreements with the following agencies:

- Department for Business Innovation and Skills
- Eastern Sea Fisheries
- Environment Agency
- Medicines and Healthcare
- OFCOM
- Office of Rail Regulations
- RSPCA
- Security Industry Authority

3.4.3. The agreements are similar, setting out duties and obligations upon both parties in relation to the recording of the commencement of proceedings on PNC. Whilst there is an undertaking by ACRO to create an Impending Prosecution (IP) within three working days, there is no duty placed upon the originating organisation to notify ACRO immediately at the commencement of proceedings.

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[7] NPIA PNC Performance October 2010
[8] See Timelines Performance Criteria at (1.3.3)

Recommendation Two

HM Inspectors recommend a review of the Data Processing Agreements with a view to placing an obligation upon NPPAs to promptly notify the commencement of proceedings.

4.   People

4.1.   Marketing and Awareness

4.1.1.   In respect of PNC awareness the approach required for marketing differs from police forces in a number ways. Firstly the organisation itself is relatively young, therefore many of the operators have only recently received training; and secondly, and crucially, all personnel use PNC daily and, due to the requirements of their role, are well aware of the system's potential.

4.1.2.   Focus group attendees highlighted a number of instances where process improvements had been implemented. There was an ownership of the processes in which they were involved and a genuine desire to improve efficiency.

4.2.   IT Training Strategy

4.2.1.   The organisation has a well-established training strategy, with all training supplied by an external, NPIA certified trainer. Courses offered are Names Enquiry, offence processing and a special course for creating Locate/Trace reports for the Operations Team. As PNC access is central to most of the jobs in ACRO, recruits are inducted in blocks to ensure they can be trained promptly.

4.2.2.   The training is classroom based and all courses have a 70% pass mark. Training records indicate that to date all attendees have passed with a mark of 90% or greater. To date no one has failed the course although there is a contingency in place to retrain any pupil not achieving the required grade. The training and quality of pupils is clearly of a high standard and HM Inspectors suggest a review of the pass mark. .

Recommendation Three

HM Inspectors recommend, in consultation with the trainer, the current pass mark be reviewed with a view to setting a higher standard.

4.2.3.   During the Induction Course, which is delivered within three months of joining the organisation, operators receive input on data protection and Professional Standards. Pupils are required to sign a declaration acknowledging their responsibilities in respect of data protection. E-learning packages are available, which recruits are required to complete within the first two weeks of work. This is considered to be good practice.

4.2.4.   After successfully completing the training course, 100% of the work of new operators is quality assured. This is tapered down over a period of time (dependent upon the skill of the operator) to the level of all operators. Any additional training is provided by a designated member of staff. This is considered to be good practice.

4.3.	Maximising the Potential of PNC

4.3.1.	ACRO has taken a number of technical initiatives to maximise the potential of PNC. In the core function of subject access, a computerised process that interfaces with PNC has been in place for some time. This has recently been extended to Police Certificates production. Both these initiatives are good examples of how business processes can be supported without the need for costly enhancements to the main system, and could usefully be emulated in other police organisations.

5.   Partnership and Resources

5.1.   Relationship with Organisations within the UK

5.1.1.   The nature of the ACRO business requires it to extensively interact not only with organisations in the UK but also law enforcement agencies abroad. In addition to the Data Processing Agreements mentioned earlier (see 3.4.2) the organisation provided evidence of formalised arrangements as follows:

Memoranda of Understanding with:

- The National Offender Management Service
- The Criminal Injuries Compensation Authority
- The National Policing Improvement Agency

Service Level Agreements with:

- The Criminal Records Bureau
- Disclosure Scotland
- The Gambling Commission
- The General Teaching Council for Wales
- The Independent Safeguarding Authority
- Access Northern Ireland
- The Medicines and Healthcare Regulatory Agency
- Middlesbrough Borough Council
- Office of Communications (OFCOM)
- The Office of Rail Regulations
- The Security Industry Authority
- Slough Borough Council

5.1.2.   All the documents relate to access to PNC either in relation to providing previous convictions, back record conversion or the creation and management of new cases (Arrest/Summons creation).

5.1.3.   It was noted that at least one SLA makes reference to providing vehicle owner information, in addition to information relating to nominals. As ACRO shares a PNC identifier with other ACPO organisations, some of which are involved in vehicle intelligence, it is not possible to quantify how often this facility is used. It is understood that this practice is under review. HM Inspectors refer the organisation to NPIA Liaison Officers Letter 2010/68 (dated 08 August 2010), where it is stated that police organisations should not give vehicle access to third parties via PNC, suggesting the third party contact DVLA directly.

5.2.   Relationship with Organisations Outside the UK

5.2.1.   ACRO divides its external data processing functions into two distinct business areas, the United Kingdom Central Authority for the Exchange of Criminal Records (UKCA-ECR) and the Rest of the World (ROW)

5.2.2.   UKCA-ECR functions are underpinned by European legislation which stipulates that the 27 European countries should exchange criminal convictions. Currently the convictions supplied under this legislation can only be used for the purpose for which they were supplied, i.e. court proceedings. Although the Home Office has provided a list of serious offences, details of which can be entered onto PNC, there is widespread consensus that the general restriction inhibits the use of valuable conviction data for intelligence purposes. It has been suggested that this restrictive use of conviction data is currently under review by the European legislature.

5.2.3.   All information is passed in the originator's native language. Upon receipt of foreign convictions the original text is translated into English and checked by an analyst to identify a matching UK offence. To assist in this ACRO have developed a comprehensive database of foreign offences and their UK equivalents. It is simplified in the case of European convictions which, unlike UK convictions, are recorded under a numbered penal code.

5.2.4.   The development of the foreign offences database ACRO has created a valuable asset, and at some time in the future ACRO should be encouraged to share this with the wider police community, possibly in co-operation with the Police National Legal Database.

5.2.5.   The Rest of the World (ROW) work was originally undertaken by SOCA[9]. Whilst SOCA and Interpol continue to manage intelligence exchange, ACRO manage requests for previous convictions and notifications to non-European countries. Unlike European conviction data there is no restriction upon the use of the convictions. There is no data exchange agreement and a number of examples were cited where it has taken a considerable time for conviction data to be received. ACRO update approximately 100 files a month for SOCA under force code 67IP. Only records with over 12 months' imprisonment are updated. It has been suggested that this is due to the fact that SOCA could not accommodate larger volumes of work.

5.2.6.   The UK Criminal Justice system has much to gain from an improvement in the ROW procedures, particularly in view of the fact that this category includes large English-speaking countries with considerable migration to and from the UK.

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[9] Serious Organised Crime Agency

Recommendation Four

HM Inspectors recommend that ACRO cease updates under other organisations input codes and use only the 89CA code (also see Recommendation 5).

5.2.7.   The working practices detailed above require an expertise far beyond that normally found in most police forces. ACRO have, primarily by experience, developed business processes to manage complex international procedures exacerbated by a multitude of foreign languages, penal codes and complex cultural differences. There are many examples of good practice.

6. Processes

6.1. <u>Relationship with Other Police Organisations</u>

6.1.1. In addition to representation by senior management at the ACPO level, the organisation is represented by managers of the appropriate seniority at the following groups:

- South East Regional PNC User Group
- Hampshire Constabulary PNC Steering and Advisory Groups
- Police Information Access Panel
- The Strategic Disclosures Group
- The Police PNC Policy and Prioritisation Group

6.2. <u>Organisational Structures and Working Practices</u>

6.2.1. At the time of the inspection ACRO had six distinct work streams all focussed on PNC, these are:

- UKCA-ECR (Conviction Exchange with Europe)
- (Conviction exchange with the) Rest of the World
- Police Certificates
- Back Record Conversion of microfiche records to PNC.
- Subject Access Requests
- NPPA management.

An Intelligence Unit commenced work on the 04 October 2010.

6.2.2. The processes are described in detail below.

6.2.3. The functions are broadly similar with some variation in detail and performance criteria. As the organisation has only operated for a relatively short period of time, the business processes described have been subject to constant review and refinement. As all processes were originally undertaken by police forces, bringing them into one place had the potential to improve efficiency and make substantial savings. HM Inspectors found clear evidence that the organisation has realised the potential of scale and built robust business processes to deliver a quality product in a timely manner.

6.3. <u>UKCA-ECR</u>

6.3.1. Convictions can be requested when any individual, regardless of nationality, who has resided in a EU country, or where intelligence suggests they may have committed

offences in any EU member state, is subject to investigation or criminal proceedings within the UK. ACRO are alerted to a conviction of a European national by the receipt of a DAF[10] report from PNC. As all forces now use a computerised custody system, the recording of an accused person's nationality is dependant upon external systems. If the nationality is not correctly recorded previous convictions will not be requested. Anecdotal evidence suggests there is insufficient diligence in recording an accused person's nationality and a number of Custody computer systems default to 'British'. The implication of this is that a full antecedent history may not be presented to court

6.3.2.   As supervision of the data originators is outside the sphere of ACRO control it is suggested that ACPO actively promotes the benefits of data accuracy and completeness through Chief Officers.

6.3.3.   In 2009 ACRO sent 6,000 requests for convictions to EU countries, approximately 30% of the responses disclosed previous convictions.

6.4.   Rest of the World

6.4.1.   The procedure for obtaining convictions for non-European countries is similar to that detailed above, with incoming conviction data being received by e-mail from SOCA. ROW convictions are usually received with fingerprints which are used to confirm the identity of the convicted person.

6.4.2.   The ROW countries do not have any restrictions on the purposes for which the conviction data can be used. This allows ACRO, after identity has been confirmed and PNC researched, to enter the convictions onto PNC if appropriate.

6.4.3.   The above relates only to conviction data; intelligence is managed by SOCA and Interpol. As agents of SOCA, ACRO updates approximately 100 nominal records per month with details of previous convictions; due to the volumes, only convictions with over 12 months' imprisonment are entered. These are entered under force code 67IP.

Recommendation 5

HM Inspectors recommend the creation of a unique PNC Identification code for all data input on behalf of SOCA (See also Recommendation 4)

6.4.4.   Until recently correspondence was exchanged with other countries in tamperproof containers. On 20 October 2010 the European Information Management System (EIMS) (which interfaces with PNC) began using the PNC identification number as a

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[10] Daily Activity File

unique identifier. It is anticipated that all EU member states will be using a European Criminal Record Information System (E-CRIS) by 2012.

6.5   <u>Police Certificates</u>

6.5.1.   Any person wishing to reside or work, and therefore requiring a visa, in the following countries must obtain a Police Certificate to inform the screening process. ACRO issues certificates on behalf of all forces with the exception of Devon and Cornwall, Wiltshire, Guernsey and Scotland. The certificate, which is sent directly to the applicant, shows whether the individual has any record of convictions and if so what they are. The countries are:

- New Zealand
- Australia
- Canada
- United States of America
- South Africa

6.5.2.   Two levels of service are available: the Standard Service produces a certificate in ten working days and costs £35, and a Premium Service which produces a certificate in two working days and costs £70. In the calendar year up to the 24 September 2010 the organisation had received 70,094 applications for police certificates, 71% of which were for the Standard Service.

6.5.3.   HM Inspectors were informed that the organisation has never failed to achieve the timeliness standard, a considerable achievement considering the volumes involved. This is assisted by the implementation of a fully computerised document preparation system with direct links to PNC.

6.5.4.   Focus Group attendees pointed to problems securing the correct convictions from Scotland and, to a lesser extent, Northern Ireland.

6.5.5.   Scottish convictions are recorded on the Criminal History System (CHS), which is operated by the Scottish Police Services Authority (SPSA). ACRO has access to CHS but operators have had some difficulty consolidating the information with PNC. The poor quality of Scottish record-keeping has been the subject of a recent report by HMIC (Scotland) and is outside the remit of this report.

6.5.6.   Northern Ireland convictions are recorded on 'Causeway', a computerised system. ACRO also has access to this system; but again operators have had difficulty in consolidating the information with PNC. To illustrate this an example was given to HM Inspectors of a person convicted and sentenced to 11 years' imprisonment who was not recorded on the PNC.

6.5.7.   This imprecise record-keeping does little to create confidence in the criminal justice system and undermines public safety. What should be a relatively simple process of data extraction from a prime system (PNC) often involved ACRO personnel in what amounts to almost detective work, trying to establish the credentials of an applicant. Their tenacity and inventiveness is worthy of note.

6.5.8.   It has been noted by HM Inspectors that ACRO are actively involved in addressing these issues and seeking to improve record-keeping, an initiative for which they must be commended.

6.5.9.   ACRO has a section head, 10 operators and an analyst to manage each country for which it provides a service. Due to the relatively low volumes, the South African and New Zealand desks act as one.

6.5.10.   The operators are supported by a Customer Service Team of nine advisors whose prime role is the management of enquiries from the public. The desk manages incoming applicant queries and resolves any ambiguities within the applications.

6.5.11.   At the time of the inspection (October 2010) the organisation was trialling a Customer Service Desk evening shift to improve public access, particularly useful as many applicants live in different time zones. Application forms and full instructions can be downloaded from a well-designed, informative website.

6.6.   Back Record Conversion

6.6.1.   On 22 June 2009 ACRO took over a function from the National Identification Service (NIS) for the back record conversion of conviction records stored on Microfiche ('fiche). A team of nine analysts (updaters, who received enhanced training to undertake this work), two part-time section heads and two and a half administrators make up the team.

6.6.2.   The BRC work relates to offenders convicted before 1995 who have not come to notice since. The PNC nominal record identifies a record for which a 'fiche exists. There are currently 1.2 million records (from an original 5.2 million) still to enter onto PNC.

6.6.3.   This work is also undertaken by police forces, the 'fiche record being originally supplied from the central depository for free. Since the NPIA have taken control of the 'fiche depository a fee of £100 is charged for each 'fiche. Police forces believe this charge to be excessive and consequently are not requesting the details of pre 1995 convictions.

6.6.4.   Since the charge was introduced in April 2010, as shown in the figure below, the number of 'fiche requests from forces has decreased. The inescapable conclusion is that police forces are not updating records with 'fiche-based convictions because the charge is considered to be excessive. Although ACRO will update a record at the request of a

disclosure organisation when a request is made by a member of the public, police forces are not always updating a record when a person is detained for a criminal offence. This can only impact adversely upon operational police efficiency and public safety.

6.6.5.   This matter, whilst not directly relevant to the ACRO inspection, is of concern to HMIC. The microfiche BRC issue should be addressed as a matter of course with a view to reducing the unrealistic financial burden placed upon forces by NPIA.

Number of 'Fiche requests
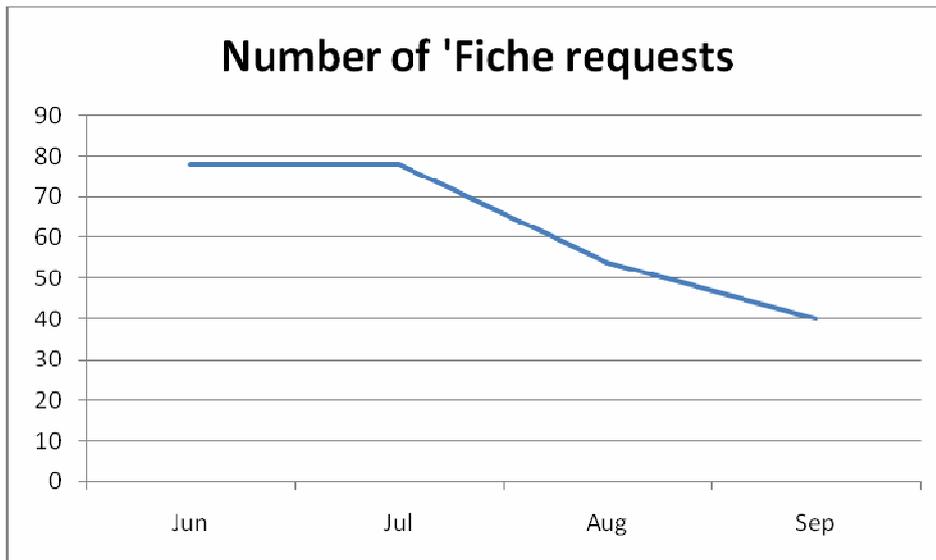
6.6.6.   ACRO undertake this work for the disclosure agencies but as they are acting as the agents of NPIA they are not charged the £100 fee for BRC. Since April 2010 they have carried out over 8,500 BRC transactions. A number of these have identified serious previous convictions not up to then recorded on PNC, an omission which could have profound implications for public safety. Some examples of the type of records are set out below.[11]

Offence	Number of Cases BRC'd
Arson	4
Grievous Bodily Harm	3
Blackmail	1
Buggery with Four Year Old Male	1
Drug Offences	12

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[11] ACRO can identify all updated BRC records.

Manslaughter	4
Murder (including attempted)	6
Rape	2
Robbery (including attempted)	20
Wounding	6

6.6.7.   Requests for a record to be BRC'd are received either by database or email. The BRC Team request the 'fiche from the NPIA for which there is a time Service Level Agreement of three working days. The 'fiche is scanned and emailed to ACRO and the details updated onto PNC. A full Modus Operandi is only entered for serious offences although, at the request of the CRB, all details of assaults are recorded.

6.6.8.   Once the records have been BRC'd they are checked by an analyst. The record is then checked by a second analyst against a print of the updated record. 100% of BRC work is quality assured. This work is of the highest quality and is considered good practice.

6.6.9.   This work by ACRO clearly highlights how serious offences over 15 years old with possible implications for public safety are not yet recorded on PNC.

6.7.   Subject Access

6.7.1.   In addition to BRC work, ACRO also took over subject access from NIS on 22 June 2009. The service provides a description of personal data (with exceptions) relating to an individual. There are approximately 60,000 requests per annum.

6.7.2.   ACRO undertake subject access for all police forces except Wiltshire, Devon and Cornwall, Guernsey and Scottish forces. They also provide the service for the Police Service of Northern Ireland and SOCA[12].

6.7.3.   Upon proof of identity and after paying a £10 fee an individual can request details from local and/or national records.

6.7.4.   PNC data quality is very variable from force to force and ACRO routinely flag up errors to the force which owns the record. It's not unusual for ACRO to have to give the subject of an enquiry a covering letter to explain an incorrect PNC record.

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[12] To date no subject access request has been received in respect of SOCA

6.8. NPPA Management

6.8.1. Non-Police Prosecuting Agencies (NPPAs) are required to record the commencement and conclusion of proceeding for recordable offences on PNC13. ACRO are increasingly undertaking this work for a number of organisations as detailed above (5.1.1).

6.8.2. In addition to the creation of a record on PNC for a fee, ACRO also undertake the monitoring and management of the subsequent Impending Prosecution (IP).

6.8.3. Notifications are received from the NPPA via email; a separate mailbox is maintained from each agency. Currently each agency provides the information using its own forms. Performance between the agencies on timeliness and the data quality of information supplied is, somewhat charitably, described as 'variable'. It has been suggested that, although the timeliness criteria for police forces is that 90% of IP's should be recorded within 24 hours of the commencement of proceedings, ACRO are receiving the information 'within a couple of weeks'.

6.8.4. All NPPA IPs are entered onto a spreadsheet with a time trigger to prompt a review of the case after 30 days. The IP is reviewed three monthly until a result is received. ACRO regularly need to 'chase' an agency for a court result.

6.8.5. Some results are automatically updated on the PNC via the Bichard 7 portal from the courts Libra system. The organisation has four portal licences, donated by other forces to view their court results. There are a number of problems with the Libra interface that require manual intervention, indeed there have only been two successful automatic updates in the last 10 months.

6.8.6. The system described above, whilst providing a better quality service than most police forces, is not working well. ACRO are right to not actively seek an expansion of the service until fundamental issues have been addressed. Operators highlight the fact that the initial information supplied is minimal, fingerprints are rarely available, and on occasions the accused person is not described, all circumstances which could contribute to incorrect nominal records being created on PNC. The situation will not improve until the NPPAs provide accurate and timely data.

6.8.7. Subject to the concerns iterated above, it is the view of HM Inspectors that ACRO could greatly assist the police service by providing an update facility for NPPAs. In the first instance it should consider the updating of records for organisations with national responsibility, and for offences with no specific geographic location.

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[13] [13] See Statutory Instrument 2000 No. 1139 The National Police Records (Recordable Offences) Regulations 2000

6.8.8.   NPPAs have consistently failed to achieve national timeliness standards in relation to the recording of proceedings on PNC. The situation can be improved by imposing professional standards upon these organisations – possibly by providing a charge for service.

Recommendation Six
HM Inspectors recommend that ACRO consult widely with the police community with a view to developing standard national practices for the management of NPPAs.

6.9.   Quality Issues.

6.9.1.   All Police Certificates and BRC records are checked for completeness and quality. HM Inspectors examined a number of documents marked up by more than one operator as part of the quality control system.

6.9.2.   HM Inspectors noted that where a local system interfaced with PNC, that system not only downloaded the PNC record and prevented double keying, but also applied a degree of intelligence to the subsequent report, assisting the operator to easily finalise it. These levels of quality control with feedback to the originator are examples of good practice.

6.10.   ViSOR

6.10.1.   ACRO currently have two operators trained on the Violent and Sex Offenders Register (ViSOR). Any conviction notifications from abroad with a sexual element are recorded on ViSOR. Dependent upon the country of origin, some convictions may be several years old before ACRO are notified.

6.10.2.   Should a sex offender return to the UK a Locate/Trace report is added to the nominal PNC record until it is known in which police force area the person resides. When a force covering the offender's residence is identified the ViSOR record is adopted. If the individual's location is not known, ACRO retain the Locate/Trace report. Currently there are 257 reports where the location of the person is unknown.

6.10.3.   The ViSOR analysts work closely with the UK Border Agency (UKBA) and make use of the Home Office Warnings Index (HOWI) and the Warnings Index Control Unit (WICU). The work is proactive and, with the assistance of the Metropolitan Police Jigsaw[14] team some notable successes have been achieved.

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[14] Justice Information Guide Supporting and Advising Witnesses

6.10.4.   ACRO routinely inform the local police force when an offender, subject to a court order which restricts travel, indicates an intention to leave the country by applying for a Police Certificate.

6.10.5.   The access to non-UK data as intelligence to track the movement of offenders in real time must impact positively upon public safety. The further development of the ACRO Intelligence Unit can only develop this excellent work further and is considered to be good practice.

7. Results

7.1. UKCA-ECR (Conviction Exchange with Europe)

7.1.1. When a European national is subject to criminal proceedings in the UK a request can be made to the accused person's country of origin for details of previous convictions. The framework agreement that created this facility suggests a response within 10 days. There have been examples of results being returned almost immediately but a number of countries fail to meet the framework criteria. This is an evolving process and, whilst ACRO achieve the required standard, the performance of other countries is outside the control of the organisation.

7.2. Conviction Exchange with Rest of the World

7.2.1. As discussed earlier, as there is no framework agreement for this work there is no performance criteria, and ACRO is therefore dependent upon the performance of organisations outside its direct control. There is within ACRO a well-understood quality regime and a desire to improve the situation.

7.3. Police Certificates

7.3.1. Police Certificates detail the applicant's record of convictions for the purposes of immigration to five countries. Two levels of response are available, the Premium service, which guarantees a two-working-days response and the Standard service, a 10-working-days response. There is no independent record kept of performance to this target but the organisation states it has never failed to achieve the required standards. It has been suggested that the new database for Police Certificates will provide this management information in the future.

7.4. Back Record Conversion on PNC Records.

7.4.1. ACRO updates records that require BRC at the request of the disclosure services. There are approximately 18,000 requests per annum. The performance criteria is that 90% of records should be updated within seven working days. There is a requirement within the respective Service Level Agreements to update the disclosure agency with the reason for delay if the request is more than 14 days old. ACRO also undertake to supply an estimated delivery date. This requirement is being met.

7.5.   Subject Access Requests

7.5.1. ACRO receives approximately 60,000 subject access request each year. The performance criteria is that the result should be dispatched to the applicant within 40 days of the request being received by a police force. This requirement is being met.

7.6.   NPPA management

7.6.1. The management of Arrest/Summons (AS) creation, the recording of the commencement of proceedings on PNC and Impending Prosecution (IP) management for non-police organisations is currently in the embryonic stages in ACRO. Despite the fact that NPPAs consistently fail to provide timely updates to PNC, ACRO manage their part of the record creation/update process very effectively. The method used for recording IPs and 'chasing' the originator for a result where appropriate is good practice and could usefully be emulated by other UK forces.

ANNEX A – SUMMARY OF RECOMMENDATIONS FOR ACRO

Recommendation One

HM Inspectors recommend that the organisation incorporate the expertise of a suitably qualified individual into the audit process to provide an independent oversight at management level.

Recommendation Two

HM Inspectors recommend a review of the Data Processing Agreements with a view to placing an obligation upon NPPAs to promptly notify the commencement of proceedings.

Recommendation Three

HM Inspectors recommend, in consultation with the trainer, the current pass mark be reviewed with a view to setting a higher standard.

Recommendation Four

HM Inspectors recommend that ACRO cease updates under other organisations input codes and use only the 89CA code (also see Recommendation 5).

Recommendation Five

HM Inspectors recommend the creation of a unique PNC Identification code for all data input on behalf of SOCA (See also Recommendation 4)

Recommendation Six

HM Inspectors recommend that ACRO consult widely with the police community with a view to developing standard national practices for the management of NPPAs.

ANNEX B – SUMMARY OF GOOD PRACTICES FOR ACRO

Timeliness and Quality of Processes

2.4.5

These procedures to monitor not only timeliness but quality and address weaknesses in real time will ensure a good quality service and are considered to be good practice.

Communication with Expert Staff

2.5.3

Due to the relatively small size of ACRO this arrangement is the most effective method of delivering these services, an arrangement which brings skills into ACRO and financial benefits to the Force. It is considered to be good practice.

Organisational Policy

3.1.1

A document 'ACPO Criminal Records Office Police National Computer Procedures Version 2' (16th September 2010) was supplied to HM Inspectors. This document, which draws from national guidelines and also incorporates local procedures, sets all policy and procedures to be used by ACRO staff in relation to PNC. The document is an easy to understand reference point for all staff and is an example of good practice.

Authority Levels

3.3.1

PNC Access is granted on behalf of the Bureau Manager when the operator successfully completes the PNC training course. The operator is allocated a user group which corresponds with their job role. There was evidence that the user groups had recently been reviewed. User ID's are reviewed after 30 days of non-use and if necessary deleted. There is a mechanism in place for role changes and operators who leave the organisation. Passwords are reset by the appropriate section head. This process of actively monitoring, reviewing and actioning users is good practice.

IT Training Strategy

4.2.3

During the Induction Course, which is delivered within three months of joining the organisation, operators receive input on data protection and Professional Standards. Pupils are required to sign a declaration acknowledging their responsibilities in respect of data protection. E-Learning packages are available which recruits are required to complete within the first two weeks of work. This is considered to be good practice.

4.2.4

After successfully completing the training course, 100% of the work of new operators is quality assured. This is tapered down over a period of time, dependant upon the skill of the operator, to the accepted standard for all operators. Any additional training is provided by a designated member of staff. This is considered to be good practice.

Relationship with Organisations Outside the UK

5.2.7

The working practices detailed above require an expertise far beyond that normally found in most police forces. ACRO have, primarily by experience, developed business processes to manage complex international procedures exacerbated by a multitude of foreign languages, penal codes and complex cultural differences. There are many examples of good practice.

Back Record Conversion

6.2.29

Once the records have been BRC'd they are checked by an analyst. The record is then checked by a second analyst against a print of the updated record. 100% of BRC work is quality assured. This work is of the highest quality and is considered good practice.

Quality Issues.

6.2.43

HM Inspectors noted that where a local system interfaced with PNC that system, not only downloaded the PNC record and prevent double keying, but also applied a degree of intelligence to the subsequent report assisting the operator to easily finalise the report. These levels of quality control with feedback to the originator are examples of good practice.

Visor

6.3.5

The access to non UK data as intelligence to track the movement of offenders in real time must impact positively upon public safety. The further development of the ACRO Intelligence Unit can only develop this excellent work further and is considered to be good practice.

NPPA management

7.6.1

The management of Arrest/Summons (AS) creation, the recording of the commencement of proceedings on PNC and Impending Prosecution (IP) management for non-police organisations is currently in the embryonic stages in ACRO. Despite the fact that NPPAs

consistently fail to provide timely updates to PNC, ACRO manage their part of the record creation/update process very effectively. The method used for recording IP's and 'chasing' the originator for a result where appropriate is good practice and could usefully be emulated by other UK forces.

ANNEX 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 force's 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 the 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. The 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 the forces urgently review their existing SCAS referral mechanisms in the light of the above findings. These reviews should include verification with SCAS that all 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 the 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 the forces ensure that each Phoenix inputting department develops an audit trail to register the return of substandard PSDs, via line supervisors, to originating officers. System developed should include a mechanism to ensure the prompt return of PSDs. The 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 the 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. The 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 the forces develop a formal system to ensure that a proportion of each member of Phoenix inputting staff's work is regularly checked for accuracy. The 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 the forces develop risk assessed force Data Protection Officer audit programmes.

Recommendation 19 (Chapter 9 page 164)

Her Majesty's Inspector recommends that the 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.

ANNEX 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.

ANNEX 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 the 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 the 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 the 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 the 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 the forces for out of hours PNC data entry purposes.

ANNEX 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 the forces. PNC statistics should then be integrated into the mainstream suite of management information/indicators that inform decisions at the 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 the 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.