



**CHESHIRE CONSTABULARY**

**27 - 30 MARCH 2006**

**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 Cheshire Constabulary between 27<sup>th</sup> and 30<sup>th</sup> March 2006.
- 1.1.2 The Constabulary was subject to a PNC Compliance Audit using the July 2005 Protocols on PNC Compliance. Her Majesty's Inspector would like to acknowledge the enthusiasm of the Force and also to place on record 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 1 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 Cheshire Constabulary covers an area of approximately 940 square miles and serves a resident population of 992,000. The county of Cheshire is one of the most affluent counties in England and Wales and has a diverse range of community responsibilities, from rural and Pennine districts from the east and across the centre of the county, to industrial towns (Warrington, Widnes, Ellesmere Port and Runcorn) in the North and the City of Chester which due to its Roman heritage, is a major centre for tourism. There are also three major motorway routes through the county, namely the M6, M62 and the M56.
- 1.2.2 The Force headquarters is located in Winsford. The Force area has recently undergone a major restructure following implementation of an initiative entitled 'Taking Control'. The initiative was introduced to ensure that the force could meet demands of the public and increase the levels of confidence and satisfaction of the public. As a result, the number of Areas was reduced from six to three, Northern, Eastern and Western with each area divided into local Neighbourhood Police Units (NPU). There are 18 NPUs in total across the force.
- 1.2.3 The Force is headed by the Chief Officer Team comprising the Chief Constable, Deputy Chief Constable (DCC), two Assistant Chief Constables (ACCs) with individual responsibilities for Operational Support and Territorial Policing. There is also an Assistant Chief Officer with responsibility for the Business Directorate. The Constabulary employs 2,214 full-time equivalent police officers, 1,208 Police staff and 207 Special Constables.

- 1.2.4 The creation of Arrest/ Summons records at Cheshire is an initial electronic process supported by manual input to PNC by staff in the Cheshire Criminal Records Office (Checro). The officer in the case completes a Phoenix Source Document (PSD) which is an electronic form on a Lotus Notes database. Upon completion of the form, eleven data items are sent to via the PNC Case Registration System (PCRS) direct to the PNC to create a skeleton record. The whole PSD form is then sent via the Lotus Notes database to Checro where staff retrieve the PSDs and manually input the remaining data items onto the relevant Arrest/Summons report on the PNC. Staff in Checro are also responsible for monitoring the PCRS to ensure that any reject messages are dealt with in order to reduce the impact on performance.
- 1.2.5 Checro does not provide a 24/7 service for the force, therefore, in the absence of Checro staff during the night and over the weekend, the responsibility for monitoring the PCRS rests with the PNC Bureau (PNCB). The PNCB, who fall within the same management structure as Checro is also responsible for all operational updates to the PNC, including Wanted/Missing reports, Stolen Vehicles and Disqualified Driver updates. The PNCB also provides telephone checks for officers and performs enhanced searches on the system, such as Vehicles On Line Descriptive Searches (VODS) and Queries Using Extended Search Techniques (QUEST).
- 1.2.6 Magistrates Results are received directly from the courts onto a printer in Checro where staff manually update the PNC with all adjournments and disposals from the court registers. Despite the force having the Xhibit system, due to claimed unreliability of the results on the system, the force continues to rely on faxes from the Crown Courts in order to update Crown Court results. Court bail conditions are faxed through to Checro on a daily basis and manually updated to the PNC.

### 1.3 Methodology

- 1.3.1 A full inspection against the 2005 PNC Protocols was carried out, covering the sections of Leadership, Policy and Strategy, People, Partnerships and Resources, Processes and Results.
- 1.3.2 The inspection was conducted over three stages with a final assessment being provided in line with the 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 27<sup>th</sup> 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 1<sup>st</sup> January 2005, the performance indicators of the ACPO Compliance Strategy were replaced by the timeliness standards contained within the newly published Code of Practice for the PNC. The PNC Code of Practice, developed by the National Centre for Policing Excellence and endorsed by ACPO, is a statutory code made under s.39a of the Police Act 1996 (inserted by section 2 of the Police Reform Act 2002). It provides scope for the Home Secretary to invoke statutory intervention for forces failing to comply. With regards to individual forces, a number of performance indicators (PIs) specifically for PNC data standards were set. Each force has a responsibility to achieve the standards set within the Code of Practice. The timeliness standards within the Code are as follows:

- 90% of recordable offences entered onto PNC within 24 hours of the commencement of proceedings. The commencement of proceedings being defined as when a person is arrested, reported or summonsed.

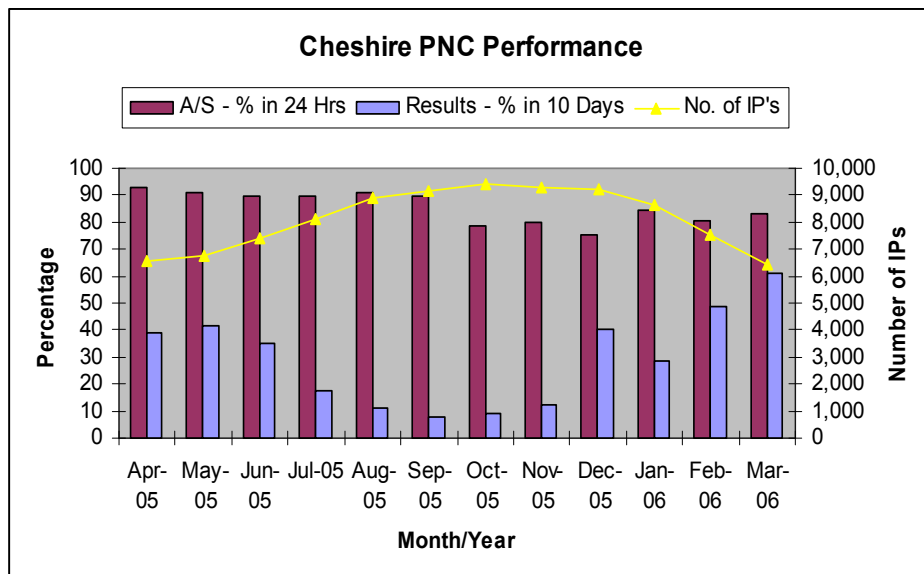
- 50% of all finalisations being entered onto PNC within 7 days of the information being received by the police. This target increased to 75% on 1 July 2005, six months after the commencement of the Code. (Courts have their own target of 3 days for delivery of data to the police. Therefore, the police are measured against an overall target of 10 days.)

1.4.4 In March 2006, Cheshire Constabulary input 83.1% of Arrest/ Summons (A/S) updates on PNC within 24 hours. This shows a decline in performance in the 12 months from March 2005 when the target of 90% was being achieved with 92.4% of cases being input within 24 hours. Current performance is below the national average for England and Wales of 86%.

1.4.5 In terms of court results, the force has consistently failed to achieve the target of updating 75% within 10 days. In March 2006, 61% of cases were input within 10 days, the highest the force has recorded in the last twelve months. Over the twelve month period, performance has ranged from 7.6% in September 2005 to 28.8% in February 2006. However, HMIC Auditors acknowledge that the supply of information from the courts has been a factor in the inability to achieve this target. (Further information is available at Paragraphs 2.4.1.1 and 2.5.2.2).

1.4.6 In terms of Impending Prosecutions (IPs) on the PNC, in the 12 months to March 2006 the Force has shown an overall decrease of 2.8%. In April 2001, HMIC supported by the Home Secretary stated that all forces should be in a position to confirm that any outstanding case that is over twelve months old, is legitimately outstanding. In Cheshire, this accounts for approximately 22% of all their outstanding prosecutions and is within the profile established by HMIC in 2001.

1.4.7 A graph illustrating Cheshire’s performance in the 12 months to March 2006 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 serious concerns in some areas of activity. In particular, the Force needs to remove some of the inefficient processes that exist in the completion and management of the Phoenix Source Documents. In addition, the force needs to ensure that all PNC training is delivered by accredited PNC trainers and that improvements are made concerning the allocation of places on PNC courses to ensure effective use of training resources.

1.5.3 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, 1<sup>st</sup> Report', *published 2001*
- HMIC Report – 'PNC Data Quality and Timeliness, 2<sup>nd</sup> Report', *published 2002*

1.5.4 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 PNC Steering Group

2.1.1.1 At the time of inspection, Cheshire Constabulary had a PNC Steering Group (PSG) which has only recently been a group in its own right. In September 2005, the group remained part of the Criminal Justice Performance Meeting which was chaired by a Chief Officer and incorporated PSG issues. Since then, there have been two PSG meetings, in January and March 2006, however, on both occasions there was no Chief Officer in attendance to chair the meeting. HMIC Auditors are aware that one of the factors for this is the lack of continuity that has been experienced within the force with three different chief officers being responsible for PNC over the last twelve months. Nevertheless, in order to drive changes and monitor overall performance, the force should ensure that chief officer involvement is maintained at a strategic level.

2.1.1.2 In addition, to the chairmanship of the PSG, HMIC Auditors are also of the opinion that the scope of the group, including the membership can be improved. For example, there is currently no representation from the BCUs on the PSG. BCUs play an integral part in delivering performance against the national targets, therefore, their involvement in the group should reflect the important responsibility they have in the process. There are two other groups within the force that monitor performance known as Performance Information Management (PIM) meetings, one is a force group and there is also a PIM specific to the Criminal Justice Department, where PNC sits within the organisation.

2.1.1.3 The Criminal Justice PIM does include representation from the BCUs at Commander level but the focus of these meetings is on performance across the whole Criminal Justice environment. Whilst PNC forms part of this, HMIC Auditors, are of the opinion that in order to develop improved knowledge of the PNC and the rationale for performance and the targets, the force would benefit from BCUs attending the PSG. The rank or grade of staff would need to be someone in a position who can influence or manage change on the BCU.

2.1.1.4 One area of good practice that was identified during the inspection was that Her Majesty's Courts Service (HMCS) is invited to attend the PSG. The invitation is an open one and a representative did attend the meeting in March 2006. HMIC Auditors consider this to be a positive step to improve relationships between the partner agencies.

2.1.1.5 With regards to the scope of the PSG, the agenda items for recent meetings have been confined to the names application and achievement towards the targets. The PNC provides both administrative and investigative capabilities across all applications and the force may benefit from expanding the remit of the group to ensure that best use is being made of the system within Cheshire.



**Recommendation 1**

**Her Majesty's Inspector of Constabulary recommends that the current structure of the PNC Steering Group is reviewed to ensure that all stakeholders are represented and that all PNC related issues are discussed. A chief officer should also take a more active role in chairing the group on a regular basis.**

## 2.1.2 Responsibility and Accountability

2.1.2.1 Accountability for the performance of the force regarding Arrest/Summons (A/S) reports rests with the BCU Commanders. Each month, a report is sent to the BCUs outlining the performance of staff from each BCU. However, the performance data only includes data relating to the quality of the Phoenix Source Documents (PSD) that have been submitted by officers. The only data that is produced concerning the timeliness of records is a forcewide statistic, therefore, the force is unable to identify whether one or all BCUs are contributing to the force's inability to achieve the timeliness targets for entry of A/S reports.

2.1.2.2 In addition, during interviews and focus groups, staff reported that there is no pressure to submit documents and that although PSDs are returned for poor quality, they felt there are no sanctions in place for persistent under performers. This is partly due to the responsibility for completion of the PSD not being clearly defined. The force uses an external Security Company, currently GSL Security, to convey prisoners to the custody suites. The same company is also responsible for carrying out certain functions of the prisoner processing, for example, taking fingerprints and DNA samples if required. During the focus groups, anecdotal evidence was provided that differing practices are being employed in different BCUs. In one BCU, the officer in the case was responsible for completing the PSD whilst in another, the external security staff complete the form on behalf of the officer. The force needs to outline the individual responsibilities of staff and the requirements of the external company before it can implement an effective monitoring process that holds staff responsible. HMIC Auditors were disappointed to note this because a workshop had been held by the force in February 2006 to provide Best Practice on completing PSDs.

**Recommendation 2**

**Her Majesty's Inspector of Constabulary recommends that the Force reiterates the correct procedure for the completion of the Phoenix Source Document. This needs to be supported by an increased level of scrutiny and accountability on officers submitting Phoenix Source Documents to ensure that documents are submitted on time and of sufficient quality.**

## 2.2 Policy & Strategy

### 2.2.1 PNC Policy and Strategy

2.2.1.1 At the time of inspection Cheshire Constabulary did not have a documented strategy for the PNC. There are no defined aims and objectives of what the force wants to achieve with PNC and there are no short, medium or long term plans. This places the force in a reactive state and is not ideally placed to deal with planned changes to the PNC that may impact upon business processes, for example, the forthcoming introduction of the Schengen Information System<sup>1</sup>.

2.2.1.2 In November 2005, the force received a letter from Her Majesty's Inspector regarding PNC performance. Furthermore, an internal review of Checra was carried out in December 2005. These two instances have resulted in the production of action plans to improve performance or remove inefficient processes, together they provide evidence that the force is currently in a reactive state. HMIC Auditors are of the opinion that the force should determine strategic aims and objectives under the auspices of the PSG which should have its own defined terms of reference. This will enable the force to plan and respond better to changes and be in a position to identify potential impacts on performance in the future.

2.2.1.3 With regards to a PNC policy, the force does not have any policies to support the use of the PNC. The force provided substantial pre-read documents prior to the inspection and reference was made to various policies. However, upon inspection of the documents and through interviews and focus groups, HMIC Auditors determined that the documentation is procedural guidance as opposed to a formal policy. A policy should indicate the individual responsibilities of everyone who accesses or uses the PNC, including staff who request data over the radio or telephone. The policy should also include information on discipline should the policy not be adhered to.

#### **Recommendation 3**

**Her Majesty's Inspector of Constabulary recommends that the Force develop strategic aims and objectives for the short, medium and long term use of the PNC. These should be documented and contained within the terms of reference for the PNC Steering Group. The force should also develop formal policies in outlining the responsibilities of all staff who access or use the PNC.**

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

## 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 Information Security/Data Protection Training. Some good practices and some areas of concern were identified during the review and these are discussed further below.

2.2.2.2 Access to the PNC is managed by the PNCB Supervisor with the PNCB staff providing resilience. The Force has processes in place to ensure that a user is only given access to the system upon completion of a training course. An e-mail is sent from the trainer to the PNCB Supervisor who then updates the PNC User Groups with relevant user information. The PNCB Supervisor also conducts regular audits to determine users who have not been on the system for several months, with access being removed if appropriate. This is viewed as good practice by HMIC Auditors, however, they were disappointed to learn that there is no formal process within the force to remove or amend access for staff who either leave or change roles within the force. In addition, whilst HMIC Auditors do not question the integrity of the work of the PNCB supervisor, there is some risk to the organisation in having individuals able to make such changes to system access with no independent auditing of the activity being carried out.

2.2.2.3 Furthermore, HMIC Auditors were provided with anecdotal evidence that numerous staff throughout the force have the ability to reset passwords on the PNC. PNCB staff, Checra Supervisors and Control Room supervision can carry out this process. It is the opinion of HMIC Auditors that limiting the number of individuals with this transaction will enhance the security of the system. The PNCB operate on a 24/7 basis and have the responsibility for managing user access, therefore, they are suitably placed to take sole ownership of this process.

### **Recommendation 4**

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

- **Introduces a process to ensure that officers and staff who move have their access amended or removed from the system as appropriate;**
- **Introduces an independent audit, at least annually, of all user access administration**
- **Reduce the number of staff with capability of resetting passwords, passing sole ownership of the process to a unit that can provide a 24/7 service.**

- 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 Cheshire Constabulary this is a function that has been devolved to the BCUs and the departments and supplemented by the Data Protection Unit.
- 2.2.2.5 Staff in the Data Protection Unit and a representative of the BCU and departments select transactions at random daily and verify their authenticity by checking with the police officer or staff member who requested the check. The individual who requested the check is asked via email to confirm that it was conducted for operational policing purposes and supporting documentation or reference numbers are requested. During focus groups, officers reported that this process would be more effective as a deterrent against PNC misuse/abuse if the checks were requested more speedily, the Data Protection Unit requests their checks on the same day that the transaction was carried out, however, on BCUs, staff reported long delays between doing the transaction and receiving the verification request.
- 2.2.2.6 With the use of an electronic process, the force has the ability to produce management information based upon the responses received and the qualitative aspect of the transaction which is also checked by the Data Protection Unit. This enables the force to target specific BCUs or departments where remedial action may be required to improve the quality of information being entered when conducting PNC enquiries. HMIC Auditors consider this to be good practice.
- 2.2.2.7 Data Protection Audits are planned annually by the Data Protection Officer (DPO) at Cheshire. The DPO performs an annual risk assessment of its IT data systems following which, decisions are made as to which systems are audited. This process complies with the ACPO Data Protection Audit Manual.
- 2.2.2.8 Prior to the commencement of an audit, the system owner is sent a pre-audit report to provide information of past performance and how the audit will be conducted. HMIC Auditors consider this to be good practice. In addition, when audits are conducted, the reports contains recommendation to improve business processes where it is found that the process has contributed to inefficiencies or errors in the data. Upon completion of the audit, the report is published to the Deputy Chief Constable in order that actions or recommendations can be completed. HMIC Auditors believe that in order to link to strategic decisions being made by the PSG, the Data Protection audit reports in relation to the PNC should also be published to the chair of the PSG. This will enable any future strategic action plan to be adapted to take cognisance of any further changes that may be required. It will also ensure that there is an effective mechanism to ensure that all recommendations are dealt with in accordance with the forces aims and objectives.

**Recommendation 5**

**Her Majesty's Inspector of Constabulary recommends that future PNC audit reports are published to the PNC Steering Group in order that recommendations can be implemented into strategic action plans.**

- 2.2.2.9 HMIC Auditors also reviewed the role of the Professional Standards Department with regard to PNC issues at Cheshire. Professional Standards are independent of operational activities and has its own PNC trained operators to provide a research capability, such independence is viewed as good practice. In addition, there are strong links between the Data Protection Officer and Professional Standards in order that Professional Standards are alerted to any suspicions regarding the use of the PNC. One area for improvement identified by HMIC Auditors is that the PSD only reacts to allegations and does not perform any proactive monitoring of PNC transactions to enable potential misuse or abuse to be identified. It is therefore possible that the Force may be missing opportunities to detect system abuse and misuse.

**Recommendation 6**

**Her Majesty's Inspector of Constabulary recommends that the Force consider options for the proactive monitoring of PNC activity.**

- 2.2.2.10 Finally with regard to PNC system security, HMIC Auditors reviewed the role of the Information Security Officer (ISO) and Data Protection Officer (DPO) with regard to training. At present, training on DP and IS issues for new staff is delivered by Data Protection staff during induction courses. There is also a section of Information Communications Training (ICT) Courses that is devoted to Data Protection and Information Security.
- 2.2.2.11 Nevertheless, whilst the force is capturing a large volume of staff to raise awareness of Data Protection and Information Security issues, HMIC Auditors found a number of areas for improvement. Firstly, there are no links between the Data Protection staff and ICT Trainers to ensure that the level of training being delivered by ICT trainers is current and up to date. The force has produced media publications on DVD but the Data Protection Officer was unsure whether this package is being used by ICT Trainers. In addition, the current process captures all new staff and staff attending ICT courses, there is no process to ensure that all other staff receive sufficient awareness, despite them using the force IT network on a daily basis.

- 2.2.2.12 HMIC Auditors are of the opinion that with the recent inception of Freedom of Information and the Government Protective Marking Scheme, the force should examine ways of raising awareness of each of these composite parts of Information Management. The review should cover efficient processes to raise awareness amongst all staff.

**Recommendation 7**

**Her Majesty's Inspector of Constabulary recommends that the Data Protection Unit develop stronger links with ICT Trainers within the Learning and Development Department to ensure that Data Protection and Information Security training is relevant and up to date. In addition, the Force should examine ways of improving the levels of awareness of each aspect of Information Security amongst all staff.**

**2.3 People**

2.3.1 Marketing and Awareness

- 2.3.1.1 In 2004, the force carried out a survey amongst staff to gauge the level of awareness regarding the functionality of the PNC. The results of the survey were used to develop a targeted marketing campaign to close any gaps in the levels of knowledge that were identified. It was therefore disappointing that HMIC Auditors discovered varying levels of awareness amongst staff during interviews and focus.

- 2.3.1.2 The level of awareness amongst staff in Crime Operations departments was generally higher than for uniformed staff and staff who are young in service. It is not unusual with PNC functionality being included on Detective Training courses and also on Senior Investigating Officer (SIO) training courses. This process not only raises the awareness of senior staff and those new to crime investigation, but provides impetus for these staff to cascade the knowledge amongst their colleagues.

- 2.3.1.3 In the case of uniformed staff and those young in service, there are few opportunities to learn about new functionality if and when the PNC is enhanced. New police recruits are provided with an input about the PNC but the level of detail is only sufficient for them to be able to request standard information over the radio, they are not informed of the more complex functions that are available to them. With the introduction of the Initial Police Learning and Development Programme (IPLDP), the force has an opportunity to exploit time with the recruits to enhance their knowledge of the system and gain improved benefits from the information contained within the system.

- 2.3.1.4 With regards to existing staff, those who will not receive detective training and who are not new in service, communication of changes to the PNC was described by staff as 'Hit & Miss'. Staff reported that e-mail is the primary media used to communicate changes within the force, however, they do not always have time to read the information in depth. As a result, a lot of information is not absorbed properly by staff.
- 2.3.1.5 The force is due to commence a further marketing campaign to raise the levels of awareness again. HMIC Auditors are of the opinion that the force should examine alternative means of communicating the changes, for example, using the training days that exist within the shift system to provide presentation to the staff. The force should also consider utilising the resources of internal marketing experts within the Corporate Communications Department in order that the benefits of the campaign are maximised.

#### **Recommendation 8**

**Her Majesty's Inspector of Constabulary recommends that the Force continue with plans to carry out a marketing campaign for PNC. The force should consider the use of internal experts and exploit existing opportunities within the current shift system to target operational staff.**

### 2.3.2 PNC Training

- 2.3.2.1 PNC training was an area at Cheshire where HMIC Auditors identified areas for improvement. The Force has ten accredited PNC trainers, two of whom are dedicated to delivering PNC training in the PNCB. These trainers deliver update training to PNCB staff. The remaining trainers deliver PNC and other ICT training courses for the Learning and Development Department (LDD). The trainers in LDD only deliver enquiry level training. The result of the current arrangements is that staff within Checra are not being trained on PNC by an accredited trainer. New staff into Checra receive their training 'on the job' with the support of a supervisor and the Checra Manager. In 2000 when the thematic inspection report 'On the Record' was published, it stated;

*"It is a requirement of the code under which forces are connected to PNC that all persons having access to PNC must have received the correct training. It has also been agreed, by the PNC Director, NPT and user groups, that training will only be delivered by trainers who have successfully attended the nationally accredited PNC Trainers Course."*<sup>2</sup>

<sup>2</sup> 'On The Record – Thematic Inspection Report on Police Crime Recording, the Police National Computer and Phoenix Intelligence System Data Quality' P.115, Paragraph 7.5.2

It is therefore of concern that this practice remains to be adopted within the force. The practice should cease immediately and the force must examine alternative arrangements for the delivery of PNC update training within Cheshro.

- 2.3.2.2 In addition to the situation in Cheshro, HMIC auditors also found further areas for improvement within the training environment. During the inspection, it was noted that there are no links or formal lines of communication between the LDD trainers and the trainer within PNCB. The LDD deliver training to a structured timetable but no evidence was provided regarding any structure to the training being delivered within the PNCB. With regards to the training courses being delivered by LDD, although they are structured, the length of the course is shorter than the prescribed length within the standards set by Centrex. For example, according to the standard, a full enquiry course should last for five days, however, in Cheshire, the same course is delivered over three days. Therefore, the force needs to satisfy itself that the content and delivery of the course is being delivered in accordance with the national standards. A similar exercise will also be prudent in relation to the training being delivered in PNCB.
- 2.3.2.3 The planning and distribution of PNC courses was also reviewed by HMIC auditors during the inspection. At the time of inspection the process for applying for a PNC course was that a member of staff submitted a business case to the Area Training Manager (ATM) for their BCU. The ATM is responsible for making the decision whether the application should be approved and will forward the details to LDD if a place on a course is required. However, during interviews and focus groups, anecdotal evidence was provided that indicated the risk of an area 'lottery' in existence because there are no clear guidelines concerning which members of staff should be allocated training places. Staff also reported that communication from ATMs and LDD was poor once the initial application had been made.
- 2.3.2.4 HMIC auditors are of the opinion that in order to maximise the training resources by only training staff who require PNC as a core function of their role, the force should consider the development of role profiles that identify the requisite skills required to fulfil that role. This will ensure that only staff who have an essential need for PNC are given PNC training. It will also reduce the risk of an area lottery taking place because guidelines will be clearly defined.
- 2.3.2.5 Good practice was identified in relation to PNC training which is worthy of note at this stage. It was pleasing that all course attendees on a course delivered by LDD are subject to a formal assessment prior to being given access to the PNC. The course content within LDD included data protection and information security issues throughout.



- 2.3.2.6 A further point to be made in respect of PNC training is with regard to post training evaluation. The Force had some good practices in place with a "Happy Sheet" at the end of each course, however, these have not been used for some time although it was stated that there are plans to re-introduce the forms in the near future. HMIC Auditors would welcome this move in order that courses can be assessed to ensure they deliver the correct aims and objectives. This process could be enhanced by the evaluation of the effectiveness of training once it has been put into practice back in the workplace. HMIC PNC Compliance Auditors view the implementation of such an evaluation process to be good practice as it assists in improving training design and delivery. Due to the high volume of training being delivered, post training evaluation could be introduced on a dip sample basis. At the time of the inspection, post training evaluation was only being carried out exception if LDD received negative feedback about the course.
- 2.3.2.7 Furthermore, the Force needs to ensure that it conducts similar evaluation of courses provided by external providers in order to ensure that it is receiving value for money from such providers. Anecdotal evidence obtained by HMIC Auditors suggested that some PNC Course provided by external providers had not been subject of any evaluation, therefore, the force cannot satisfy itself that the level of training was sufficient and met the expectations of the force. In failing to evaluate external training courses, there are increased risks that staff will require subsequent re-training in order to have the skills to fulfil their duties.
- 2.3.2.8 Finally with regards to training, the Force should ensure that staff and officers are aware of the ViSOR (Violent and Sexual Offenders Register) marker on the PNC and the procedure to be applied when a check is performed of an individual who is a ViSOR subject. Focus groups conducted by HMIC Auditors showed that knowledge of the marker and the procedure was limited to a few individuals and it is therefore possible that vital intelligence is being lost with regard to some of these more serious offenders.

**Recommendation 9**

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

- **Immediately cease the training of Checra staff by non-accredited trainers;**
- **Develop role profiles to maximise the use of training resources in order that training is only delivered to staff who have a specific need to carry out their duties;**
- **Enhances its training evaluation process which includes post-training evaluation when trainees have had the opportunity to put the training into practice for all PNC courses and covers training delivered by external providers and;**
- **Ensures that all officers and staff are aware of the ViSOR marker on PNC and the procedures to be adopted when a check is performed on a ViSOR subject.**

**2.4 Partnerships and Resources**

## 2.4.1 Relationship with the courts

2.4.1.1 The Force has experienced problems with the courts concerning the delivery of court data for update on the PNC. This has resulted in a focussed effort by the force to establish improved relationships in order that benefits can be gained across the whole of the Criminal Justice service.

2.4.1.2 This effort is evidenced by the Operations Manager from Her Majesty's Courts Service (HMCS) being invited to the force PNC Steering Group. The Operations Manager had already attended one meeting prior to the inspection and the invitation remains an open one. The force has also held meetings with HMCS representatives from each of the courts in the force area. The meeting was held to discuss the respective issues that each service has in relation to the updating of court results on the PNC. This was a further positive step resulting in exchange visits by operational staff in each agency to gain an appreciation of the work being carried out.

2.4.1.3 In addition, the force attended an Administration of Justice meeting in July 2005. This meeting is hosted by HMCS on a quarterly basis and is attended by the force single point of contact (SPOC). This provides a further opportunity to discuss any deficiencies in processes that may exist between the courts and the police and have also been used to resolve qualitative issues arising during the exchange of information.

## 2.4.2 Relationship with non police prosecuting agencies (NPPAs)

2.4.2.1 With the introduction of the Code of Practice for PNC in January 2005, the target for the input of A/S records no longer includes those records which are updated as a result of an NPPA prosecution. However, there is still a need for forces to ensure that these records are updated in a timely manner to assist operational policing activity. This can only be achieved if forces encourage the NPPAs to provide complete, timely and accurate information for input to PNC. HMIC Auditors would therefore encourage the Force to introduce Service Level Agreements with its NPPAs to achieve this.

2.4.2.2 The force has a process to monitor the performance of submissions of each NPPA. Records are kept on a monthly basis which are then sent to the respective NPPA for their information. However, without an SLA to supplement this process, there is no requirement for the NPPA to respond in terms of improving timeliness. This limits the benefits of the current process because the number of NPPAs submitting data in a timely manner is negligible compared to the volume of NPPA cases being processed by the courts.

### **Recommendation 10**

**Her Majesty's Inspector of Constabulary recommends that in order to enhance the existing process of recording information pertaining to the performance of Non Police Prosecuting Agencies, the Force considers the benefits in developing formal Service Level Agreements with external agencies for the timely submission of data.**

## 2.5 Processes

### 2.5.1 Creation and update of Arrest/ Summons (A/S) reports

2.5.1.1 On 1<sup>st</sup> January 2005, the performance indicators of the ACPO Compliance Strategy were replaced by the timeliness standards contained within the newly published Code of Practice for the PNC. The PNC Code of Practice, developed by the National Centre for Policing Excellence (NCPE) and endorsed by ACPO, is a statutory code made under s.39a of the Police Act 1996 (inserted by section 2 of the Police Reform Act 2002). The Code stipulates that 90% of recordable offences be entered onto PNC within 24 hours of the commencement of proceedings. The commencement of proceedings is defined as when a person is arrested, reported or summonsed.

- 2.5.1.2 Cheshire Constabulary create A/S summons reports on the PNC by sending a skeleton record from the PNC Case Registration System (PCRS) to PNC via an interface. All offenders that are processed in the custody suites for recordable offences should have a record created on PCRS so the information can be transmitted to PNC. PCRS contains information for a complete record to be created on PNC, however, a skeleton record is created via the interface and the remaining information is sent to Checra via a Lotus Notes database to enable manual update of the full record.
- 2.5.1.3 During the inspection, aside from the lack of clarity relating to individual responsibilities at custody suites mentioned in paragraph 2.1.2.2, HMIC Auditors found a number of inefficiencies in the process of creating and managing the timely input of data onto the PNC. Firstly, HMIC Auditors were informed that Quality Assurance (QA) staff on the BCUs are responsible for monitoring the ATLAS< the force custody system to ensure that records are updated for all relevant offenders who are processed in the custody suite. In addition, the QA staff should also ensure that the records updated on the Phoenix database are of sufficient quality to be updated on PNC before the data is sent to Checra. Evidence was provided to show that despite this process being in place, a large number of records are submitted to Checra with poor quality or insufficient data. This causes an administrative burden on Checra when requesting the correct data.
- 2.5.1.4 Furthermore, anecdotal evidence was provided to highlight the number of failures that occur when records are transferred over the interface. The number of errors could not be defined but during interviews and focus groups, staff reported a range of between 12% and 50% errors. This will have a significant impact on the performance of the force; therefore, a member of staff in Checra has the responsibility to monitor the exchange of data between PCRS and PNC to ensure that errors are dealt with a timely manner. However, whilst this process exists, no records are kept, nor is there any analysis of the reasons why records fail, therefore, the problems cannot be tackled at source to eliminate administrative inefficiencies that ensue and ensure that performance can be improved.
- 2.5.1.5 In addition, HMIC Auditors found poor processes in relation to the chasing up of late submissions of records via PCRS. During the inspection, HMIC Auditors were shown a database containing details of outstanding records that were still required to be sent to PNC and subsequently to Checra. One of the records on the database dated back to December 2005. The force must ensure that robust processes are put in place to manage the submission of all records and when officers fail to respond, a suitable escalation process should be implemented. This can also be supplemented by Management information being provided to BCU commanders on a regular basis to reduce the risks of officers repeatedly failing to submit data. This should assist the force in achieving a sustainable position in delivering performance against the Arrest/Summons target.

**Recommendation 11**

**Her Majesty's Inspector of Constabulary recommends that the Force reviews the whole process of creating and submitting Phoenix Source Documents, removing any inefficient processes and implementing a more robust monitoring regime to ensure that documents are submitted on time and of sufficient quality.**

**2.5.2 Update of court information**

2.5.2.1 The monthly performance statistics show that Cheshire Constabulary appear to be performing poorly in respect of the updating court results on the PNC. However, it has previously been mentioned (Paragraph 2.4.1.1) that the delivery of data from the courts has been a factor in this process. Therefore, for this section of the report, HMIC Auditors looked at the processes that are within the control of the force.

2.5.2.2 Court data is received electronically from the courts and is printed out in Checra to enable operators to manually update the results on the PNC. HMIC Auditors were encouraged to note that following receipt of the information, the force does update the data in a timely manner and keeps records to evidence this. A spreadsheet is kept to record the date of the court hearing, the date it was received within the force and also what date the information was updated on PNC. In light of the current monthly statistics that are produced by PITO showing the force to be underperforming, HMIC Auditors consider this to be good practice.

2.5.2.3 Furthermore, HMIC Auditors were also encouraged to learn that the force updates all relevant information from the court data, for example, as well as disposal data, the force also updates all remand histories and adjournments. This ensures complete and accurate records are maintained on the PNC.

**2.5.3 Modus Operandi (MO) keywords**

2.5.3.1 MO keywords are a parameter that can be used during a QUEST search. This is an important intelligence feature of the PNC, which can be used to identify possible suspects, particularly for serious offences, during a police investigation. It has been a requirement for several years that all forces must input MO keywords into the system to ensure that searches via QUEST cover the whole of PNC.

- 2.5.3.2 The process within in Cheshire is that the QA staff on the BCU, who are responsible for the Phoenix Source Documents, review the MOs on the documents to identify those which are relevant for keywording. When offences are identified, QA staff complete a section on the PSD with the relevant keywords and forward the PSD to Checra for manual update of the keywords on to the PNC. However, varying practices exist across the BCUs in that in some cases, witness statements are used in order to determine a comprehensive set of keywords, whereas in other cases, the MO supplied by the officer on the PSD is the only information used.
- 2.5.3.3 HMIC Auditors are of the opinion that the varying practices are undermining the benefits that could be achieved from deriving relevant keywords relating to serious offences. They are also concerned that staff with limited training on the PNC are being utilised to research, analyse and define data that is subsequently used during complex searches and often form part of major investigations.

**Recommendation 12**

**Her Majesty's Inspector of Constabulary recommends that the Force reviews the current responsibility for determining keywords relevant for update on the PNC. A centralised approach using current expertise will ensure a consistent approach to the function and improve the quality of information being updated.**

- 2.5.4 Ad hoc intelligence updates<sup>3</sup>
- 2.5.4.1 Cheshire Constabulary do not currently have a process in place to capture and update ad-hoc intelligence on the PNC. Intelligence updates are submitted to the intelligence analysts on each BCU, however, if any of the data is relevant to a PNC record, for example, the addition of a new tattoo to a known offender, or a new address for a known offender, the information is only retained on the local intelligence system.
- 2.5.4.2 During interviews and focus groups, operational officers informed HMIC Auditors that there is an assumption that when intelligence data is submitted using the force Form 451, all relevant systems are updated. HMIC Auditors found this not to be the case, therefore, the force is encouraged to raise the awareness amongst intelligence analysts of the type of information that can be updated on the PNC. This should also be supported by the implementation of an efficient process to ensure that relevant information is updated on the PNC.

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

**Recommendation 13**

**Her Majesty's Inspector of Constabulary recommends that the Force develop a process to ensure that ad-hoc intelligence is updated on the PNC. The process should be preceded by an effort to raise awareness amongst intelligence analysts of the type of data that is applicable to the PNC.**

## 2.5.5 Data Quality

2.5.5.1 HMIC Auditors conducted reality checks at Cheshire to determine the quality of data being supplied by officers and subsequently input to PNC. This was achieved by obtaining 20 copies source input documents from PCRS, reviewing their content and comparing the details submitted to the PNC record. HMIC Auditors also reviewed 20 records from court registers and carried out a Vehicle On-Line Descriptive Search to find all Information Reports that had been updated on vehicles by Cheshire on a particular date.

2.5.5.2 HMIC Auditors were pleased to note that the vehicle reports reviewed were complete and complied with national standards. HMIC Auditors also found a good level of quality with regards to the information being updated on PNC by staff in Checra. Of all the records checked, a negligible number of minor errors were found which would not have had any operational impact if the records had been checked. The force should be commended on the quality of information being updated on the system.

2.5.5.3 One potential area for improvement in terms of data quality that HMIC Auditors found concerns the recording of performance of individual staff within Checra and the PNCB. During interviews, staff reported that quality is a standing objective on Performance Development Reviews (PDRs). However, it was also reported that when quality control work is carried out within the two units, no records are kept of errors that are found. Any errors are dealt with on an informal basis. HMIC Auditors are of the opinion that if staff are to be held accountable in PDRs for the quality of their work, management should be in a position to evidence this during the annual reviews.

**Recommendation 14**

**Her Majesty's Inspector of Constabulary recommends that the Force develops its quality assurance processes to ensure that results of staff performance are recorded and used within the PDR process.**

## 2.5.6 Bail Conditions

2.5.6.1 The update of bail conditions is the responsibility of staff within Checro. Court bail conditions are faxed from the court on a daily basis and updated by staff who work on a shift system that is designed to respond to information being sent from the courts at the close of business each day. This ensures that all court bail conditions are updated on the system in a timely manner. The update of court bail conditions is also supported by staff updating remand histories from court registers. If bail conditions are shown on the court register, staff check to ensure that the information has been received and that PNC accurately reflects the validated information on the court register.

2.5.6.2 With regards to police bail conditions, the process suffers from some of the inefficiencies mentioned in paragraph 2.5.1.3. Police Bail conditions are contained on the electronic PSD submitted on PCRS and are updated on PNC by staff in Checro. However, due to the lack of management concerning the submission of these forms on the BCUs, staff in Checro do not have the confidence in the information being submitted via PCRS. The result is that staff in Checro do a comparative check on the custody system for every record received on PCRS to ensure all data is accurate. This places an administrative burden on Checro and is impacting on the productivity of staff within the unit. Recommendation 2 and 11 of this report should contribute to improvements in this area.

## 2.5.7 Warning Signals

2.5.7.1 Warning Signals are used on PNC to provide protection to officers dealing with people on the streets and also to protect the welfare of prisoners who are taken to the custody suite because the information is used as part of the risk assessment made by the custody officer.

2.5.7.2 Within Cheshire, warning signals are requested by officers when they complete the PSD and forward it to Checro via the Lotus Notes database. Staff in Checro add the warning when carrying out the manual updates to the record to supplement the initial skeleton record that has been created via PCRS. HMIC Auditors were pleased to note that when officers omit to request a warning, staff in Checro are empowered to use their initiative and make a decision whether a warning signal is applicable or not.

2.5.7.3 Furthermore, in order to support the regular reviews of warning signals that are required under Data Protection legislation, the forces appends the text of a warning signal with the words 'On Conviction' if the warning signals relates to an offence that has subsequently been dealt with at court. This also provides immediate information to PNC operators concerning the level of justification for a warning signal. During reality checks carried out by HMIC Auditors, no negative issues were identified in relation to the updating of warning signals.



## 2.6 Results

- 2.6.1 In March 2006, Cheshire Constabulary input 83.1% of Arrest/ Summons (A/S) updates on PNC within 24 hours. This shows a decline in performance in the 12 months from March 2005 when the target of 90% was being achieved with 92.4% of cases being input within 24 hours. Current performance is below the national average for England and Wales of 86%. In terms of the number of days to enter the quickest 90% of cases, the force was taking 2 days in March 2006, just outside of the target. This performance has been consistent over the last twelve month with the worst performance being 3 days in December 2005. This performance is better than that national average for England and Wales of 12 days. HMIC Auditors are of the opinion that by removing inefficiencies in the processes and implementing a more robust monitoring regime, the force can achieve the targets on a sustained basis.
- 2.6.2 In terms of court results, statistics show that the force has consistently failed to achieve the target of updating 75% within 10 days. In March 2006, 61% of cases were input within 10 days, the highest the force has recorded in the last twelve months. Over the twelve month period, performance has ranged from 7.6% in September 2005 to 28.8% in February 2006. However, HMIC Auditors acknowledge that the supply of information from the courts has been a factor in the inability to achieve this target (Further information is available at Paragraphs 2.4.1.1 and 2.5.2.2). The force can evidence that from the date of receipt of information from the courts; approximately 90% are updated on PNC within 7 days.
- 2.6.3 Finally, with regard to outstanding prosecutions on the PNC in the 12 months to March 2006 the Force has shown an overall decrease of 2.8%. In April 2001, HMIC supported by the Home Secretary stated that all forces should be in a position to confirm that any outstanding case that is over twelve months old, is legitimately outstanding. In Cheshire, this accounts for approximately 22% of all their outstanding prosecutions and is within the profile established by HMIC in 2001. HMIC Auditors are therefore assured that the Force is able to provide such confirmation.

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

Her Majesty's Inspector of Constabulary recommends that the current structure of the PNC Steering Group is reviewed to ensure that all stakeholders are represented and that all PNC related issues are discussed. A chief officer should also take a more active role in chairing the group on a regular basis.

(Paragraph 2.1.1.5)

**Recommendation 2**

Her Majesty's Inspector of Constabulary recommends that the current structure of the PNC Steering Group is reviewed to ensure that all stakeholders are represented and that all PNC related issues are discussed. A chief officer should also take a more active role in chairing the group on a regular basis.

(Paragraph 2.1.2.2)

**Recommendation 3**

Her Majesty's Inspector of Constabulary recommends that the Force develop strategic aims and objectives for the short, medium and long term use of the PNC. These should be documented and contained within the terms of reference for the PNC Steering Group. The force should also develop formal policies in outlining the responsibilities of all staff who access or use the PNC.

(Paragraph 2.2.1.3)

**Recommendation 4**

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

- Introduces a process to ensure that officers and staff who move have their access amended or removed from the system as appropriate;
- Introduces an independent audit, at least annually, of all user access administration
- Reduce the number of staff with capability of resetting passwords, passing sole ownership of the process to a unit that can provide a 24/7 service.

(Paragraph 2.2.2.3)

**Recommendation 5**

Her Majesty's Inspector of Constabulary recommends that future PNC audit reports are published to the PNC Steering Group in order that recommendations can be implemented into strategic action plans.

(Paragraph 2.2.2.8)

**Recommendation 6**

Her Majesty's Inspector of Constabulary recommends that the Force consider options for the proactive monitoring of PNC activity.

(Paragraph 2.2.2.9)

**Recommendation 7**

Her Majesty's Inspector of Constabulary recommends that the Data Protection Unit develop stronger links with ICT Trainers within the Learning and Development Department to ensure that Data Protection and Information Security training is relevant and up to date. In addition, the Force should examine ways of improving the levels of awareness of each aspect of Information Security amongst all staff.

(Paragraph 2.2.2.12)

**Recommendation 8**

Her Majesty's Inspector of Constabulary recommends that the Force continue with plans to carry out a marketing campaign for PNC. The force should consider the use of internal experts and exploit existing opportunities within the current shift system to target operational staff.

(Paragraph 2.3.1.5)

**Recommendation 9**

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

- Immediately cease the training of Checra staff by non-accredited trainers;
- Develop role profiles to maximise the use of training resources in order that training is only delivered to staff who have a specific need to carry out their duties;
- Enhances its training evaluation process which includes post-training evaluation when trainees have had the opportunity to put the training into practice for all PNC courses and covers training delivered by external providers and;
- Ensures that all officers and staff are aware of the ViSOR marker on PNC and the procedures to be adopted when a check is performed on a ViSOR subject.

(Paragraph 2.3.2.8)

**Recommendation 10**

Her Majesty's Inspector of Constabulary recommends that in order to enhance the existing process of recording information pertaining to the performance of Non Police Prosecuting Agencies, the Force considers the benefits in developing formal Service Level Agreements with external agencies for the timely submission of data.

(Paragraph 2.4.2.2)

**Recommendation 11**

Her Majesty's Inspector of Constabulary recommends that the Force reviews the whole process of creating and submitting Phoenix Source Documents, removing any inefficient processes and implementing a more robust monitoring regime to ensure that documents are submitted on time and of sufficient quality.

(Paragraph 2.5.1.5)

**Recommendation 12**

Her Majesty's Inspector of Constabulary recommends that the Force reviews the current responsibility for determining keywords relevant for update on the PNC. A centralised approach using current expertise will ensure a consistent approach to the function and improve the quality of information being updated.

(Paragraph 2.5.3.3)

**Recommendation 13**

Her Majesty's Inspector of Constabulary recommends that the Force develop a process to ensure that ad-hoc intelligence is updated on the PNC. The process should be preceded by an effort to raise awareness amongst intelligence analysts of the type of data that is applicable to the PNC.

(Paragraph 2.5.4.2)

**Recommendation 14**

Her Majesty's Inspector of Constabulary recommends that the Force develops its quality assurance processes to ensure that results of staff performance are recorded and used within the PDR process.

(Paragraph 2.5.5.3)

**APPENDIX B – SUMMARY OF GOOD PRACTICES AT CHESHIRE**

- Her Majesty's Courts Service have an open invitation to attend the force PNC Steering Group
- Regular audits are carried out of User IDs on PNC in order to remove staff who are not using the system.
- Management Information is available in relation to the Transaction Monitoring carried out against PNC transactions.
- Pre-audit reports are sent to system owners prior to the commencement of a data protection audit.
- All PNC Courses delivered by Learning and Development Department include a formal assessment before access is given to the system.
- The force records statistics concerning the update of court information once it has come into the possession of the force.

**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 – 1<sup>ST</sup> 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 – 2<sup>ND</sup> 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.