LANCASHIRE CONSTABULARY

29 NOVEMBER – 3 DECEMBER 2004

POLICE NATIONAL COMPUTER

COMPLIANCE REPORT

Report Contents

1. Executive Summary

1.1 Introduction

1.1.1 Her Majesty's Inspectorate of Constabulary (HMIC) conducted a PNC Compliance Inspection of Lancashire Constabulary between 29th November and 3rd December 2004.

1.1.1 Lancashire Constabulary was selected for inspection as part of the annual inspection programme operated by the PNC Compliance Audit Team. HMIC PNC Compliance Auditors adopt a risk based approach to the annual plan using statistical information provided by the Police Information Technology Organisation (PITO) on a monthly basis. The monthly statistics, supplied to HMIC and all forces in the United Kingdom, outline performance of Forces in relation to the key performance indicators of the Association of Chief Police Officers (ACPO) PNC Compliance Strategy. (see paragraph 1.4.3)

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 two of the three Basic Command Units (BCU – referred to in this report as Division). These views have been supported by reality checks conducted by HMIC PNC Compliance Auditors.

1.2 Background

1.2.1 Lancashire Constabulary polices an area of 1,907 square kilometres, with a resident population of 1.4 million which greatly increases during the summer months, with an influx of visitors to resorts such as Blackpool, Lancaster and Morecambe and to the Pennine foothills. Lancashire has a strong and diverse economic base, underpinned by a long urban and industrial tradition. The county has a significant transportation network, with five major motorway links, namely the M6, M61, M55, M58 and the M65. It also accommodates the busy ports of Heysham and Fleetwood, together with the main West Coast railway line. There has also been a steady increase in air traffic, with the expansion of Blackpool Airport. Clearly, such a diverse range of needs places a variety of demands on the police.

1.2.2 Policing services within Lancashire are provided bv six territorial Basic Command Units, known locally as Divisions, each led by a chief superintendent area commander. These territorial Divisions are coterminous with the district councils. A seventh division provides specialist operational support to frontline officers across the county.

1.2.3 The Force is headed by the chief officer group, based at headquarters in Hutton near Preston, comprising the Chief Constable, Deputy Chief Constable, Assistant Chief Constable (Operations), Assistant Chief Constable (Criminal Justice and Standards) and Director of Resources. The Force strength comprises approximately 3,585 full-time equivalent police officers, 345 special police constables and 1,915 police staff.

1.2.4 The PNC function falls within the portfolio of the ACC (Criminal Justice and Standards) who has overall responsibility for the function. However, day to day management is devolved to the Head of G Division and the PNC Manager. The PNC Manager has responsibility for the development of forcewide policies for PNC and for management of the PNC Bureau.

1.2.5   The PNC Bureau (PNCB) at Force Headquarters is responsible for updating vehicle and property records, Wanted/Missing reports and Disqualified Drivers. The PNCB is also responsible for providing specialist PNC services to the Force, such as Vehicle On-Line Descriptive Searches (VODS), Queries Using Extended Search Techniques (QUEST) and putting blocked vehicle markers and covert markers on PNC records. The PNC Bureau consists of 10 members of staff working a five week shift pattern. The Bureau is open 24 hours per day, seven days per week. The PNCB also includes 3 part-time members of staff who are responsible for the input of bail conditions on the system and 2 full-time administrative posts.

1.2.6   The creation of Arrest/Summons reports on the PNC is an automatic process within Lancashire Constabulary. The Force has an interface to PNC from its custody system. The custody system sends an electronic transmission of the full record, including charge details and descriptive data for transfer to PNC. The officer in case updates the custody system with charge details and the modus operandi (MO) and Civilian Detention Officers in the custody suites input descriptive data, including fingerprints and DNA information.

1.2.7   Crown Court results are received by the Criminal Justice Support Teams (CJS) which are located on each Division. The CJS teams update the PNC with the disposal data. Magistrate's court data is automatically transmitted to the PNC from the courts via the ICJS system, without intervention by the Force, and the divisional CJS teams only correct any errors which may prevent transmission. The CJS teams are also responsible for the management of warrants, which are circulated locally via the warrants system initially, prior to being circulated on the PNC. The CJS warrants clerks notify the PNCB if a warrant requires circulation on the PNC and the PNCB update the system accordingly.

1.3   Methodology

1.3.1   A full inspection against the 2003 PNC Protocols was carried out, covering the sections of; Leadership; Policy & Strategy; People; Partnerships & 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 PNC Compliance Auditors with documentation to support their adherence to the protocols. This was followed up by a visit to the Force with HMIC PNC Compliance 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 computer records, reviewing outstanding cases and a review of PNC policy documentation.

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

1.4   Current Performance

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

- Accuracy
- Timeliness
- Completeness
- Relevancy

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

1.4.3   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 targets set by the Pis in order to improve their position for each of the aspects mentioned above. The key Pis of the strategy are as follows:

i.   Arrest & Charge – 90% of cases to be entered within 24 hours (where forces are using skeleton records as initial entry, full update must be achieved within 5 days)

ii.   Court Case Results – 100% to be entered within 72 hours of coming into police possession. (Magistrates Courts have their own target of three days for the delivery of data to the police, therefore, the police are measured against an overall target of 7 days, to take account of weekends and holiday periods)

1.4.4   Lancashire Constabulary's results in terms of timeliness of input of Arrest/ Summons records, as shown in the national statistics provided by the Police Information Technology Organisation. In November 2003, the force was achieving 93.7% of records input within 24 hours against the ACPO target of 90%. By October 2004 this had fallen to 78.3% In April 04 the Force took the decision to enter arrest /summons in order to accommodate opportunities under the Criminal Justice Act 2003 for the retention of DNA and fingerprints. This has largely contributed to deterioration in performance. The time taken to enter the quickest 90% has also deteriorated since November 2003. In November 2003, the time taken to enter the quickest 90% was 1 day which has increased to 42 days in October 2004.

1.4.5   The performance trend in relation to court results has improved although current performance is below the ACPO target of 100% within 7 days of the court appearance. Over the last twelve months, performance has ranged from 50.9% in November 2003 dropping to 39.2% in January. In October 2004, the Force achieved 63.7% of results being input within 7 days. In terms of the number of days to enter the quickest 90% of results, performance ranges from the Force's best performance of 22 days in September 2004 to a high of 57 days in January 2004. The latest data available at the time of writing this report, October 2004, showed that the Force is taking 46 days to enter the quickest 90% of court results. This is above the national average of 39 days.

1.4.6   At the time of the inspection, the number of outstanding impending prosecutions (IPs) owned by the Force had shown an increase of 15.2% from 10,091 in November 2003 to 11,625 in October 2004. However, this increase is attributed to the Force's decision to input police bail data and Penalty Notices for Disorder (PNDs) on the PNC. HMIC PNC Compliance Auditors are assured that the Force is effectively managing its outstanding cases on the system.

1.4.7   A graph illustrating Lancashire's performance in the 12 months to October 2004 is shown below.
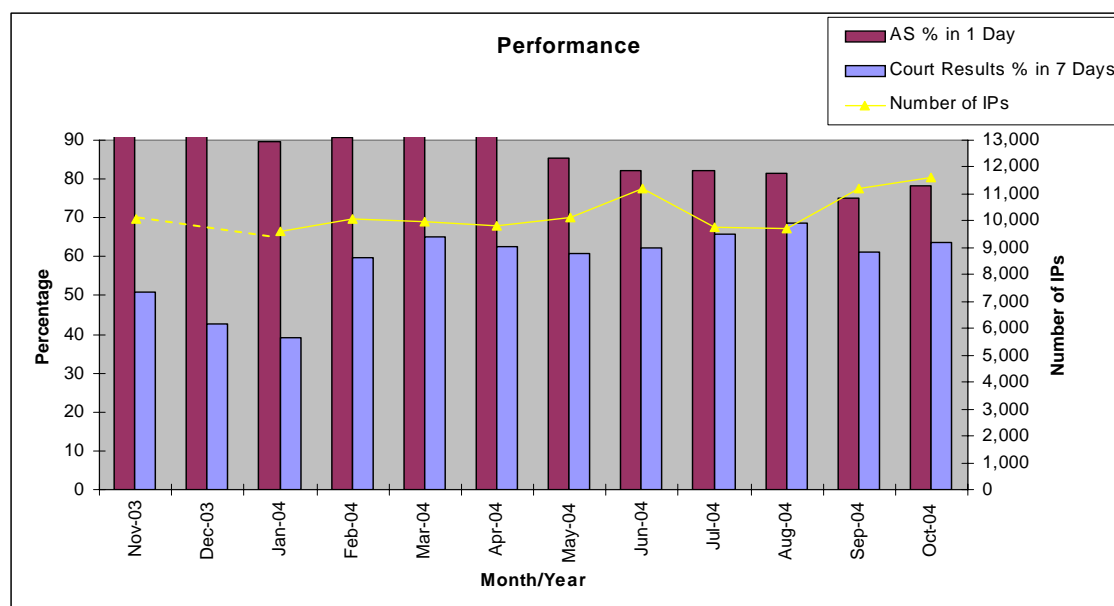
Note: The dotted line between Nov 03 and Jan 04 for the Number of Ips has been included to show the trend during the period, although PITO have been unable to provide IP statistics for Dec 03.

1.5   Conclusions

1.5.1   HMIC's assessment of PNC compliance within the Force has been assessed as: **FAIR**.

1.5.2   This assessment is based on the detailed findings of the report. However, the key areas can be summarised as follows:

1.5.2.1 Her Majesty's Inspector commends the Force for its development of IT systems which interface with the PNC and which assist in the maintenance of complete, accurate and up to date data on the PNC. Such systems are supported by established policies and procedures of which police officers and staff are aware.

1.5.2.2 However, Her Majesty's Inspector has concerns about the security of the PNC at Lancashire Constabulary. There are many individuals and groups of individuals, such as the PNCB, the Training Department and the IT Department who are able to create, amend and delete user access to the system. In addition, the Force has performed no transaction monitoring and limited data protection auditing of the system for 18 months.

1.5.2.3 Her Majesty's Inspector is also concerned about the training provision at Lancashire Constabulary. The Constabulary was unable to provide HMIC PNC Compliance Auditors with details of all those who are providing training as the exact number was not known. Combined with the security issues described above, the Force is at risk of officers and staff being given access to the system having received training which is not to national standards.

1.5.2.4 Her Majesty's Inspector would like to draw attention to the fact that the overall grading given to the Force arises primarily as a direct result of the weaknesses in security and training identified. Therefore, the Force is urged to give consideration to the issues identified in these areas as a matter of priority.

1.5.2.5 The Force needs to raise the profile and awareness of the functionality of the PNC and of the roles and responsibilities for performing key tasks, particularly amongst its geographic teams. At present, the Force is not gaining maximum benefit from the system.

1.5.3   The findings of this report should be read in conjunction with the previous HMIC reports and recommendations relating to PNC. The previous reports are;

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

1.5.4   A summary of good practice and recommendation from this report are shown at Appendices A and B of this report. Summaries of the recommendations of the previous reports are shown at Appendices C to F of this report.

2. Detailed Findings and Recommendations

2.1   Leadership

2.1.1   PNC Meetings Structure

2.1.1.1 Lancashire Constabulary has an established meeting structure with an Information Management Group, which includes PNC, comprising all relevant stakeholders who meet to discuss PNC and other information management issues at a strategic level. The Group is chaired by an Assistant Chief Constable (ACC) and convenes on a bi-monthly basis.

2.1.1.2 In addition, the Force intends to develop a PNC Security Council and a PNC User Group. At the time of the inspection, the PNC Security Council had only recently held its inaugural meeting and no meeting of the PNC User Group had yet taken place. HMIC PNC Compliance Auditors would encourage the Force to progress its plans for these meetings in order to ensure that the key issues of PNC security and practitioner concerns can be addressed.

> **Recommendation 1**
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> **Her Majesty's Inspector of Constabulary recommends that Lancashire Constabulary progress its plans for the PNC Security Council and PNC User Group.**

2.1.2   Performance monitoring

2.1.2.2 HMIC PNC Compliance Auditors were encouraged to learn that Management Information is provided to Divisional Commanders, concerning the timeliness of information being supplied by officers to update the PNC. However, discussions with Divisional Commanders highlighted the need for management information to be provided more frequently and needs to incorporate quality issues in summary to identify trends and thus enable Divisional Commanders to take effective action to rectify problems.

> **Recommendation 2**
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> **Her Majesty's Inspector of Constabulary recommends that PNC performance data be included in routine performance data provided to Divisional Commanders and should contain summaries of divisional performance and the quality of data submitted by officers for input to the system.**

2.1.3   Responsibility and Accountability

2.1.3.1 HMIC PNC Compliance Auditors were encouraged to note that officers and staff throughout Lancashire Constabulary were aware of the Force's policies and their own responsibilities in relation to the submission of data for input to the PNC. Such awareness is of particular importance when data is transmitted automatically through an interface with no further human intervention.

2.1.3.2 In addition, the fact that the Force has developed its own custody system which interfaces to the PNC has enabled the Force to make certain data fields mandatory which assists in ensuring that all relevant information is captured. Clearly, it is not possible to make all fields mandatory as this could impede operational activity and, as a result, the PNCB intends to perform quality checks for non-mandatory fields and to incorporate the results into routine management information. HMIC PNC Compliance Auditors support this proposal in order to further improve the accountability of officers and staff submitting data.

2.2   Policy and Strategy

2.2.1   With regard to policy and strategy, the inspection highlighted some areas of good practice and some that warrant review. These can be described under five broad headings: PNC Policy & Procedures; PNC Strategy; User Access; Transaction Monitoring; Data Protection Auditing and the role of Professional Standards. Each of these topics is discussed in further detail below.

2.2.2   PNC Policy & Procedures

2.2.2.1 HMIC PNC Compliance Auditors were provided with a copy of a document entitled 'Police National Computer Compliance Policy'. This was supported by further policy and procedural documents in relation to the custody process and the management of warrants. A review of these documents showed them to provide clear and comprehensive guidance. Furthermore, during focus groups held with officers and staff, HMIC PNC Compliance Auditors were pleased to note that all those interviewed were aware of the policies and of their responsibilities. Lancashire Constabulary is therefore employing good practice in this regard.

2.2.3   PNC Strategy

2.2.3.1 Lancashire Constabulary does not currently have a documented strategy for the PNC. However, the Information Management Group has a documented Strategic Action Plan which is reviewed at each meeting that provides ownership of issues to stakeholders enabling the Force to be proactive. HMIC PNC Compliance Auditors are reassured that the Force has strategic direction for the PNC with documented Action Plan.

2.2.3.2 As part of the documentation review, HMIC PNC Compliance Auditors reviewed the Strategic Action Plan. Whilst this provides a structured and methodical approach to tackling PNC issues at a strategic level, it was noted by HMIC PNC Compliance Auditors that the person responsible for progression of almost all the actions is the PNC Manager. This may warrant review by the Force as there is no resilience if the PNC Manager were to be absent without notice, e.g. due to illness. HMIC PNC Compliance Auditors also question some actions which are attributed to the PNC Manager relate to departments over which he has no control.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that the Strategic Action Plan be reviewed to ensure that responsibility for actions is given to the appropriate officer or member of staff to ensure resilience and to ensure that actions can be progressed.

2.2.4   User Access Levels

2.2.4.1   Responsibility for the management of user access to the PNC rests with several individuals and departments across the Force. At the time of the inspection, 61 individuals were listed as being able to create, amend and delete users on the PNC. This is partly due to the fact that the PNC can be accessed via several other systems within the Force. However, HMIC PNC Compliance Auditors believe that the number of people able to set up and amend user access should be restricted to a manageable number in order for the integrity of the system to be maintained. Currently the Force is exposed to the risk of users being provided with access to the system, have not received appropriate training or who are given access to parts of the system for which they have not received training. There is also the danger of redundant accounts being left on the system or more alarmingly or of fraudulent accounts being created. This approach is contrary to the principles of the PNC Code of Connection and the PNC Manual;

It is essential that all personnel having contact with PNC facilities must be trained to the correct standard by trainers who have themselves been fully accredited by Centrex.[1]

2.2.4.2 Furthermore, HMIC PNC Compliance Auditors learned that the Force has not independently audited the function being carried out by those able to set up and amend user access. No audits have been carried out for a number of years of PNC users, although the PNC Manager had commenced a piece of work to determine that only those who have received training and are still employed by the Force had access to the system. However, HMIC PNC Compliance Auditors recommend that such an audit should be carried out at least annually by an individual or department which is independent and does not have any operational responsibility for the system.

> **Recommendation 4**
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> **Her Majesty's Inspector of Constabulary recommends that the Force introduce an independent process to audit PNC Users which should be conducted at least annually.**

2.2.5   Transaction Monitoring

2.2.5.1 Transaction monitoring at Lancashire Constabulary had not taken place for approximately 2 years at the time of the inspection. Transaction monitoring is a requirement of the ACPO Data Protection Manual and is an important activity in the prevention and detection of misuse and abuse of the PNC.

2.2.5.2 The Force had recently taken a decision that this role will be undertaken by the PNC Bureau and electronic tagging software has been purchased by the Force to assist with this. However, the result of this activity being performed by the PNCB means that invariably they may be confronted with one of their own transactions or those of their supervisors to verify. This is by no means an ideal situation and ownership of the process should rest with a department that is independent of the PNC function, for example, Data Protection.

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[1] Extract from Section 5 (Training) of Volume 1 of the PNC Manual, version 4.01, March 2004.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that the Force urgently introduces transaction monitoring, its policy for this activity is reviewed and that the software purchased by the Force be implemented at the earliest opportunity.

2.2.6   Data Protection Auditing

2.2.6.1 The Data Protection Department within Lancashire performs an annual risk assessment of its IT data systems in order to produce an Audit Plan. In addition, the Data Protection Department has responsibility for Subject Access requests and non-Criminal Records Bureau disclosures. The Department has provision for one auditor, and a Subject Access Clerk, a Disclosure Officer and the Data Protection Officer. At the time of the inspection, the Information Security Manager was covering the responsibilities of the Data Protection Officer who was on maternity leave, reducing the capacity of the Data Protection Department. As a result of the resource issues and volume of work undertaken by the department, only three audits of the PNC had been performed in the 12 months leading up to the inspection.

2.2.6.2 HMIC PNC Compliance Auditors reviewed the work which had been undertaken by the Data Protection Department and are assured that the process to plan, conduct, report and follow up the recommendations of audits are sufficient and in accordance with ACPO guidelines. This helps to ensure that all issues identified can be rectified and process improvements put in place. In the current climate with the Bichard Inquiry, it is imperative that forces ensure that data protection issues identified are rectified as a matter of priority.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that Lancashire Constabulary review its audit resources and ensure that there is sufficient resource to fulfil the requirements of the audit planning process.

2.2.7   Role of professional standards

2.2.7.1 The Professional Standards Department (PSD) at Lancashire is responsible for investigating any inappropriate or illegal conduct by police officers and staff, including allegations of misuse or abuse of PNC data. Currently, the department will conduct overt and covert investigations following any allegations made by members of the constabulary or a member of the public.

2.2.7.2 However, HMIC PNC Compliance Auditors were informed that the PSD relies on the assistance of the PNCB to obtain and interpret detailed information on transactions conducted by the individuals under investigation and to enable proactive monitoring of them. In addition, 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 the opinion of HMIC PNC Compliance Auditors that the PSD may compromise the covert nature of its work by its reliance on the PNCB and may be missing opportunities to detect system abuse and misuse.

> **Recommendation 7**
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> **Her Majesty's Inspector of Constabulary recommends that the Professional Standards Department consider expanding its PNC skills base to assist in its investigations and to enable proactive monitoring of the system.**

2.3   People

2.3.1   Marketing and Awareness

2.3.1.1 The level of awareness of PNC functionality was generally good throughout the Force. Many officers were aware of the Vehicle On-line Descriptive Search (VODS) although knowledge of Queries Using Enhanced Search Techniques (QUEST) was more variable, particularly by uniformed officers. Furthermore, officers and staff were aware of which departments and individuals are able to conduct complex searches. HMIC PNC Compliance Auditors commend the Force for the work which has been conducted in this area to date and would urge a continuation of this work to ensure that all staff and officers are aware of the benefits which can be gained to operational policing through the use of PNC's enhanced facilities.

2.3.2   Training

2.3.2.1 PNC training is provided by a number of individuals and departments at Lancashire Constabulary. HMIC PNC Compliance Auditors were unable to ascertain the exact number of people providing training in the Force. This problem is exacerbated by the fact that access to the PNC can be gained via several other systems within the Force, e.g. the custody system. This absence of control over who is providing training and therefore the standard of training being provided is a cause for concern to Her Majesty's Inspector.

2.3.2.2 HMIC PNC Compliance Auditors became aware of several further issues which relate specifically to the PNC Training provided by the Force's IT Training department which are worthy of note:

- At the end of each training course, those who have received training are asked to evaluate the course. However, there is no follow up to ensure that the training provided was adequate once 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.

- The Force provides refresher training or re-assessment for PNC access upon request, although there is no requirement for users to undertake such refresher courses. Therefore, many staff who received training a number of years ago, particularly those trained before the names application was enhanced in 1995, have not received any additional training despite the significant changes in the information that is stored within a nominal record and the increased levels of access which these staff have been given to the system.

- Lancashire Constabulary have implemented Mobile Data Terminals (MDTs) and was in the process of rolling out Personal Digital Assistants (PDAs) at the time of the inspection. HMIC PNC Compliance Auditors obtained anecdotal evidence of officers being given access to the PNC via

these media following a short training session on use of the terminals without being required to undertake a PNC Enquiry course which would ensure that they fully understand the data provided and are able to interpret it appropriately. This is contrary to the Force's own policy as well as national guidance on PNC access.

Recommendation 8

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

- **Immediately establish which individuals are providing PNC training and ensure that each trainer is delivering to national standards;**
- **Introduce a process for post training evaluation which takes place once the recipient of the training has put the training into practice;**
- **Introduces a re-assessment for all officers and staff who have previously received PNC training. Refresher training should be provided for any staff who fail the assessment;**
- **Ensure that with immediate effect all officers who have access to the PNC via media such as MDTs and PDAs are required to undertake a PNC enquiry course that covers all relevant parts of PNC prior to being given access.**

2.4   Partnerships and Resources

2.4.1   Overall, this is an area in which Lancashire Constabulary has made good progress. Of particular note are the relationships that have been developed with the local Courts and the Crown Prosecution Service through the monthly Courts User meetings. This has led to the introduction of electronic results from the magistrates courts which are able to automatically update the PNC.

2.4.2   With regards to Non Police Prosecuting Agencies (NPPA) the Force is developing relationships that will enable improved performance in the submission of the source documentation from NPPAs. The PNCB write to NPPAs regarding the quality of data received for input to the PNC in order to raise awareness of the data required.

2.4.3   In addition, the Force has developed a service level agreement (SLA) with the British Transport Police for the provision of VODS and QUEST searches. The Force should be commended for its commitment to working with other forces in this manner.

2.5 Processes

2.5.1   In terms of processes, HMIC PNC Compliance Auditors found a number of areas within Lancashire Constabulary that are worthy of note in this report. In particular, the Force is to be praised for the IT systems enhancements it has made to enable the full update of all records on PNC, warrants management and the management of persons missing from home. However, HMIC PNC Compliance Auditors also identified some areas for improvement. These relate to the ad hoc intelligence updates, MO keywording, the use of Comparative Case Analysis, the use of insurance data, the circulation of court warrants and the update of Warning Signals.

2.5.2 Ad Hoc Intelligence Updates[2]

2.5.2.1 Lancashire Constabulary does not currently have any process for the capture or update of ad-hoc intelligence on the PNC. Intelligence is captured on the local intelligence system. However, there is no process to identify any data that is applicable to PNC and arrange for the subsequent updating of the appropriate record. During an interview with a senior officer, PNC was perceived to offer less benefit than local systems because intelligence is not recorded. This perception could be changed if officers knew that their information could be used on PNC and a process was developed to make the relevant updates.

> **Recommendation 9**
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> **Her Majesty's Inspector of Constabulary recommends that the Force expand the process for capturing intelligence to guarantee that information applicable to PNC is identified and that a process is developed to ensure that the information is updated accordingly.**

2.5.3   MO keywording

2.5.3.1 Lancashire Constabulary does not currently update MO keywords on the PNC. 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 is 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. It is vital to the success of PNC that Lancashire Constabulary urgently commences the input of MO keywords.

> **Recommendation 10**
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> **Her Majesty's Inspector of Constabulary recommends that the Force commence MO keywording, particularly for serious offences.**

2.5.4   Comparative Case Analysis

2.5.4.1 Comparative Case Analysis is a database that resides on PNC and allows forces to retrieve nationally collated information on unsolved serious crimes in order to enable the force to compare and potentially link similar crimes. The database records information about a suspect and the modus operandi (MO) as well as other useful information about the crime, e.g. times, dates, locations, victims. Using the search facility, similar offences across force boundaries can be identified with the potential for investigating officers to share information about their respective investigations. Furthermore, during the week of the inspection CCA was replaced by a system known as 'Crimelink' which will also reside on PNC but will expand the use of the database to include solved crimes.

2.5.4.2 HMIC PNC Compliance Auditors were informed that the Force does not fully populate or use the existing CCA application. In failing to populate or search this database, Lancashire Constabulary is potentially missing opportunities to

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[2] Information applicable for update to PNC that originates from a source other than the creation of an arrest/summons report

identify similar offences or serial offenders. Therefore, the force is not receiving most benefit from the full wealth of information available to them

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that Lancashire Constabulary considers fully updating and searching the new Crimelink application in relation to unsolved crime data.

2.5.5   Use of insurance data

2.5.5.1 During reality checks, HMIC PNC Compliance Auditors noted that all users who have access to perform a vehicle enquiry at Lancashire, are able to view insurance details. Furthermore, during meetings and focus groups anecdotal evidence was given of cases where officers have used this information for non road traffic policing purposes, e.g. during a missing from home enquiry. Use of the insurance database via the PNC for this reason is in breach of national policy, and could contravene the Data Protection Act.   Access to insurance data is provided through a data sharing agreement with the Motor Insurance Bureau allowing access to assist in the prevention and detection of road traffic offences only. However, police forces can request to use the information for other purposes by applying to the MIB using an exemption under Section 29(3) of the Data Protection Act 1998. HMIC PNC Compliance Auditors discovered that very few staff were aware of this. Lancashire Constabulary should therefore limit the number of users with access to the information in order to ensure that it is only used in appropriate circumstances.   The force needs to satisfy itself that the use of the information provided by the vehicle insurance database is used in line with national policy.

Recommendation 12

Her Majesty's Inspector of Constabulary recommends that Lancashire Constabulary ensures that access to insurance data is only provided to those who have received appropriate training and awareness of the limitations of its use is raised amongst officers.

2.5.6   Update of Warning Signals

2.5.6.1 There are two ways by which warning signals can be put on the PNC at Lancashire Constabulary. A warning signal can be added to a custody record which will automatically update the PNC. In addition, an officer can contact the PNCB and request that a warning signal be manually added to a record.

2.5.6.2 During reality checks conducted by HMIC PNC Compliance Auditors 30 custody records were checked against PNC to gain assurance about data quality and to ensure that a complete record is transferred to the PNC from the custody system. One of the 30 cases examined was the record of an individual who had been charged with several violent offences since 2001. Despite this violent history, there was no warning signal on the record.

2.5.6.3 The existence of a Warning Signal on a record is the only method of alerting a police officer that someone could be a danger to themselves, to the officer or to the public and, as such, it is imperative that that such information is updated on the PNC.

> **Recommendation 13**
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> **Her Majesty's Inspector of Constabulary recommends warning signals are checked as part of the quality assurance process being introduced by the Force.**

2.6   Results

2.6.1   Lancashire Constabulary's results in terms of timeliness of input of Arrest/ Summons records, as shown in the national statistics provided by the Police Information Technology Organisation, have deteriorated since April 2004. In November 2003, the force was achieving 93.7% of records input within 24 hours against the ACPO target of 90%. By October 2004 this had fallen to 78.3%. However, this is largely due to the decision taken in April 04 to enter arrest / summons in order to accommodate opportunities under the Criminal Justice Act 2003 for the retention of DNA and fingerprints. As the Force transmits such data via an interface, a workaround has had to be developed which involves a record being transmitted to PNC when the decision is known.

2.6.2   When an offender returns to custody, they may be either charged, cautioned or No Further Action (NFA) taken. At this stage a new record is created and the original bail record is removed from the PNC. If they are charged or cautioned the new record created shows the process date on the PNC as the charge/ caution date. However, if No Further Action is taken against the offender, the original bail date is taken on the PNC as the process date. The performance statistics show the time taken between the process date and the date on which on PNC is updated. Therefore, NFA cases have a detrimental effect on the Force's performance statistics due to the apparent time delay between the process date and the NFA date. During the inspection, the Force was able to provide HMIC PNC Compliance Auditors with the following statistics for October 2004 from its custody system.

Type of report	% transmitted to PNC within 24 hours	Number of records transmitted
Charge	97	1600
Caution	95.5	645
Penalty Notice	96	423
Police bail	90	1389
No Further Action	45	1437

2.6.3   The time taken to enter the quickest 90% has also deteriorated since November 2003 for the reasons described above. In November 2003, the time taken to enter the quickest 90% was 1 day which has increased to 42 days in October 2004.

2.6.4   The performance trend in relation to court results has improved although current performance is below the ACPO target of 100% within 7 days of the court appearance. Over the last twelve months, performance has ranged from 50.9% in November 2003 dropping to 39.2% in January. In October 2004, the Force achieved 63.7% of results being input within 7 days. In terms of the number of days to enter the quickest 90% of results, performance ranges from the Force's best performance of 22 days in September 2004 to a high of

57 days in January 2004. The latest data available at the time of writing this report, October 2004, showed that the Force is taking 46 days to enter the quickest 90% of court results. This is above than the national average of 39 days.

2.6.5   At the time of the inspection, the number of outstanding impending prosecutions (IPs) owned by the Force had shown an increase of 15.2% from 10,091 in November 2003 to 11,625 in October 2004. However, this increase can be attributed to the Force's decision to input police bail data on the PNC. HMIC PNC Compliance Auditors conducted reality checks on 20 outstanding cases to ensure that they were legitimately outstanding and are assured that the Force is effectively managing its outstanding cases on the system.

2.6.6   The recommendations outlined so far in this report aim to improve the quality and timeliness of the data being input to PNC. Work is required by the Force to ensure that performance is improved and can be sustained on a long term basis.

Appendix A

Summary of Good Practices at Lancashire Constabulary

- The Force has policies and procedural guidance in place to cover all key aspects of PNC activity.
- The Force has developed a custody system which is able to transmit the full custody record direct to the PNC without the need for further manual intervention.
- The Force has developed an interface with the magistrates courts which allows the direct update of results information by the courts on PNC.
- The Force has developed a workaround which enables police bail to be updated via the interface.
- The Force is actively engaged with its NPPAs in order to improve the timeliness and quality of data for input to the PNC.
- The Force is working with other forces in drawing up agreements to provide VODS and QUEST searches.

APPENDIX B

Summary of Recommendations for Lancashire Constabulary

Recommendation 1
Her Majesty's Inspector of Constabulary recommends that Lancashire Constabulary progress its plans for the PNC Security Council and PNC User Group.

(Paragraph 2.1.1.2)

Recommendation 2
Her Majesty's Inspector of Constabulary recommends that PNC performance data be included in routine performance data provided to Divisional Commanders and should contain summaries of divisional performance and the quality of data submitted by officers for input to the system.

(Paragraph 2.1.2.2)

Recommendation 3
Her Majesty's Inspector of Constabulary recommends that the Strategic Action Plan be reviewed to ensure that responsibility for actions is given to the appropriate officer or member of staff to ensure resilience and to ensure that actions can be progressed.
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(Paragraph 2.2.3.2)

Recommendation 4
Her Majesty's Inspector of Constabulary recommends that the Force introduce an independent process to audit PNC Users which should be conducted at least annually.

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(Paragraph 2.2.4.2)

Recommendation 5
Her Majesty's Inspector of Constabulary recommends that the Force urgently introduces transaction monitoring, its policy for this activity is reviewed and that the software purchased by the Force be implemented at the earliest opportunity.

(Paragraph 2.2.5.2)

Recommendation 6
Her Majesty's Inspector of Constabulary recommends that Lancashire Constabulary review its audit resources and ensure that there is sufficient resource to fulfil the requirements of the audit planning process.

(Paragraph 2.2.6.2)

Recommendation 7
Her Majesty's Inspector of Constabulary recommends that the Professional Standards Department consider expanding its PNC skills base to assist in its investigations and to enable proactive monitoring of the system.

(Paragraph 2.2.7.2)

Recommendation 8

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

- Immediately establish which individuals are providing PNC training and ensure that each trainer is delivering to national standards;
- Introduce a process for post training evaluation which takes place once the recipient of the training has put the training into practice;
- Introduces a re-assessment for all officers and staff who have previously received PNC training. Refresher training should be provided for any staff who fail the assessment;
- Ensure that with immediate effect all officers who have access to the PNC via media such as MDTs and PDAs are required to undertake a PNC enquiry course that covers all relevant parts of PNC prior to being given access.

(Paragraph 2.3.2.2)

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that the Force expand the process for capturing intelligence to guarantee that information applicable to PNC is identified and that a process is developed to ensure that the information is updated accordingly.

(Paragraph 2.5.2.1)

Recommendation 10

Her Majesty's Inspector of Constabulary recommends that the Force commence MO keywording, particularly for serious offences.
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(Paragraph 2.5.3.1)

Recommendation 11

Her Majesty's Inspector of Constabulary recommends that Lancashire Constabulary considers fully updating and searching the new Crimelink application in relation to unsolved crime data.

(Paragraph 2.5.4.2)

Recommendation 12

Her Majesty's Inspector of Constabulary recommends that Lancashire Constabulary ensures that access to insurance data is only provided to those who have received appropriate training and awareness of the limitations of its use is raised amongst officers.

(Paragraph 2.5.5.1)

Recommendation 13

Her Majesty's Inspector of Constabulary recommends warning signals are checked as part of the quality assurance process being introduced by the Force.

(Paragraph 2.5.6.3)

Appendix C

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 Trails 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 D

Thematic Inspection Report on Police Crime Recording, the Police National Computer and Phoenix Intelligence System Data Quality –

'On The Record'

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. Forces should manage this process 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 E

Police National Computer Data Quality and Timeliness – 1st Report

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

Police National Computer Data Quality and Timeliness – 2nd Report

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