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DYFED-POWYS
POLICE AND CRIME
COMMISSIONER**

**Heddlu Police
DYFED-POWYS**

POLICING BOARD REPORT

PURPOSE: Police Accountability Board – Focus on Protecting Vulnerable People

Timing: Policing Board – 27th March 2018

Title: Records Management and Crime Data Integrity

Business Area Impact: Information Management and Compliance / Force Crime Registrar

Executive Summary:

This report provides key updates in respect of the business areas detailed below, following queries raised by the Office of the Police and Crime Commissioner (OPCC)

- Information Management and Compliance
- Crime Data Integrity and Force Crime Registrar

1. Information Management and Compliance

1.1 Overview and governance

Governance for the Information Management Business Area moved in 2017 from Legal and Compliance to Chief Superintendent portfolio (Governance and Change).

Since November 2017 T/Chief Superintendent Steve Cockwell has been strategic lead and T/Chief Inspector Gary Davies has been performing the role of Information Manager. The department is in a period of transition with 8 staff members being on temporary contracts and the future structure and resourcing of the department yet to be fully determined.

The main areas of focus have been: -

- Review of roles within department to align with Authorised Professional Practice (APP).
- Continuous Improvement Exercise held to identify waste, inefficiencies and duplication of effort.
- Review and updating of all policies within Information Management Business Area.
- Preparing for implementation of Data Protection Bill and GDPR
- Implementing Government Security Classification procedures and utilisation of TITUS software.
- Addressing action points from Ascentor report, previously commissioned.
- Addressing points raised in ICO undertaking and having a robust mechanism for decision making on any potential breaches.

1.2 Records Management and PNI

The work relating to Records Management relates to the following areas
- Reviewing and scanning paper records stored at various police premises
- Review and consolidation of PNI duplicate and rejected nominals
- Applying RRD (Review, Retention, Deletion) assessment under MOPI categories.

The 3rd element cannot be completed until the first 2 elements have been finalised.

In terms of scanning there is a plan in place to have digital converted all relevant records within a 2 year period.

The issue concerning PNI remains of concern due the high numbers of duplicate and rejected nominals that are in system and continue to be created. We are at the stage now where almost all auto matching has been completed to a level that provides assurance.

At present there are 272,526 nominal that require clerical matching and a total of 617,115 rejected nominals in system.

Additional funding has been provided for a further 4 temporary staff to assist in this process but timescales cannot be provided at this time due to the continued problem of poor data quality.

1.3 Records Management System Group

A Records Management System Group has been set up, which is chaired by the ACC and a copy of the terms of reference are included below.

RMS Terms of
Reference final version

The first meeting was held on Thursday 22nd March 2018.

There are no definitive timescales on a decision on whether to migrate to another Record Management System, but the Deputy Chief Constable has requested a progress update on the work of the group by the end of May 2018, prior to the next Chief Officer Visionary seminar.

1.4 ICO Undertaking

The ICO undertaking was signed and agreed by Chief Constable Mark Collins on the 12th September 2017, following a number of ICO reported breaches and penalties.

A comprehensive response to the undertaking will be submitted on Monday 26th March 2018 and a further verbal update can be provided at Policing Board detailing the significant progress that has been made, which predominantly relates to the training that has been provided to all staff.

The OPCC has previously raised a query on completion rates for the ICALT packages and these currently stand at 86% for Police Staff and 79% for Police Officers. The statistics are being reviewed as persons shown as not completing packages include leavers, seconded staff, staff on career break and those on long term sick.

The NCALT package is only a small part of a comprehensive training plan that has been implemented with the support of Learning and Development Services.

A teleconference has been arranged with the ICO on 3rd April 2018 following the submission of all relevant documents in order to check that the ICO are satisfied with the information provided.

2. Crime Data Integrity and Force Crime Registrar

2.1 Background

In 2014 the HMIC conducted a Crime Data Integrity Inspection and the forces were assessed as only recording 68% of reported crime.

Significant resources were lost from Crime Recording Bureau and the Force Crime Registrar under the Public First Programme (2014) and as such only limited audit has been progressed since that time.

2.2 TIIA Compliance Audit

A TIIA Compliance Review of Crime Recording in 2018 provided a grading of reasonable assurance with the following comments: -

- Dyfed Powys-Police has a detailed Crime Recording, allocation and Investigation Policy, which includes the process, in place.
- The Crime Recording, allocation and Investigation Policy needs to be made clearer in relation to the process.
- The audit schedule for 2018/19 needs to be finalised and the schedule adhered to.
- Issues with the data integrity of crime recording were noted.

These recommendations have been progressed and are managed through the Strategic Crime Recording User Group (CRUG).

2.3 Crime Data Quality Assurance Policy

A Crime Data Quality Assurance Policy has been drafted and is pending approval through the Strategic Crime Recording User Group (CRUG). All potential entry points for crimes have been mapped and an audit plan has been completed pending approval.

The Home Office indicative sample sizes are unrealistic and scoping would require a team in excess of 17 staff members within Force Crime Registrar.

Other than the Force Crime Registrar and Deputy there are 2 full time members of staff for audit. A further post has been funded for part year in 2018/2019 budget and the sample size will reflect the staffing levels as well as addressing the very high and high priority areas.

CDI QA POLICY
DRAFT v4 Feb 2018.do

In addition an Audit and Quality Assurance Framework is being developed across all business areas and will commence from April 2018. Crime Data Integrity will be a golden thread through all frameworks. This will be key to improving Crime Data Integrity throughout the Force.

Crime Data Integrity Champions have also been identified within each BCU (4 per BCU) and received training on 19th March 2018. As part of the Spring Training Programme all frontline staff received training on Crime Data Integrity with relevant scenarios around points of entry explored.

2.4 ICAT evaluation

A copy of the ICAT Evaluation that was conducted by Chief Inspector Craig Templeton is attached. The ICAT team have dealt with 16% of total crime for the Force at a time when there has been an increase of 16% in volumes.

The evaluation refers to criming at first point of contact, but this is only applicable to a percentage of the crimes reported. The limitations of the report recognise that the Crime Recording Bureau function was not evaluated.

ICAT evaluation -
Final v4.pdf

The findings of the report have been discussed with C/Supt Vicki Evans and it has been agreed to consider the wider functions of ICAT to include the CRB function and a need to develop processes further.

2.5 Preparation for CDI Inspection

There have been significant improvements in addressing Crime Data Integrity issues, as have been outlined. Whilst there has been approximately 16% increase in crime with the implementation of ICAT, this is in the context of a previous HMIC compliance rate of 68%. If no other improvements were made a 16% rise in crime would relate to an increase of compliance to approximately 79%.

It is recognised that we may still have a further 15-20% rise in overall crime to reach the Crime Data Integrity Standards that are required. From a review of other Force Inspections, it appears that anything under 85% is assessed as inadequate, under 90% requires improvement.

A recent audit of STORM data from December 2017 to February 2018 showed a compliance rate of 85%. An audit rate of PROTECT for the same period showed a poor compliance rate of only 50% and this has been addressed via CID management.

With further rises in crime rates likely, the process for determining what crimes are allocated to frontline BCU staff is of particular significance in order to manage workloads and to remove bureaucracy where possible.

2.6 Conclusion

Whilst CDI issues are being addressed, this is against a background of failing to address some of the key issues identified in 2014. The date for the 2018 Crime Data Integrity Inspection has yet to be announced, but it is likely to come too soon before the benefit of all positive changes are realised fully.

Moving forward, true recording at the point of contact will need to be implemented to reach the high compliance rates that are achieved by Forces Wales who adopt such an approach and have the processes and resources to support this.

Steve Cockwell
T/Chief Superintendent