

THAMES VALLEY POLICE

HMIC REPORT “BUILDING THE PICTURE”
COMMENTARY ON RECOMMENDATIONS FOR THE POLICE AND CRIME
COMMISSIONER

OCTOBER 2015

1. INTRODUCTION

- 1.1 In March 2013, HMIC published the findings of a review into how the Metropolitan Police Service, Surrey Police and Sussex Police dealt with the information and allegations which they received between 1964 and 2008 regarding the criminal sexual conduct of the late Jimmy Savile.
- 1.2 The review considered the way in which these forces followed the Code of Practice on the Management of Police Information 2005 and examined the extent to which those forces made effective use of the Police National Database to aggregate discrete pieces of information and build a picture of the extent and nature of the alleged offending.
- 1.3 HMIC concluded that mistakes had been made in the handling of information and allegations and stated that we were “sufficiently concerned about information management” to conduct a further review in this area. The *Building the Picture* inspection, which examined the business processes police forces in England and Wales use to collect, record, process, evaluate and share information, took place in 2014 and the results were published on 2 July 2015.

2. Context

- 2.1 The Code of Practice on the Management of Police Information was published by the Home Secretary in 2005 following the recommendations of the Bichard Inquiry into the murder of Jessica Chapman and Holly Wells by Ian Huntley. Chief Constables were required to ‘show regard’ to the Code of Practice by December 2010 and guidance was published by the NPIA which set out how they could achieve this.
- 2.2 The guidance has now superseded by Authorised Professional Practice (APP) but no allowances for cost constraints due to austerity have been made and some forces have struggled to continue to show regard. There has also been some debate over what ‘regard’ means.
- 2.3 This is the first time that HMIC have inspected forces since the original Code of Practice was published. Thames Valley Police was not one of the 13 forces visited. It is in a relatively good position, having maintained a central Information Management department through collaboration with Hampshire. However, issues with legacy data and delays to implementation of MoPI functionality in Niche RMS have hampered full alignment.

3. Findings

3.1 The main findings of the report were as follows:

- Few forces had recorded their reasons for decisions to depart from the Code of Practice;
- Few forces had a current information management strategy;
- Few forces had reviewed or audited compliance since 2010;
- Forces which maintained a central information management team were better able to adopt the principles of MoPI;
- This was especially the case when those teams had access to an integrated computer system which could reference and facilitate the assessment of all the information held on a named individual;
- Some forces were not reviewing information and determining whether it still needed to be kept;
- Few forces had adequate processes for reviewing sensitive information with a limited audience and determining when it was appropriate to make it more widely available within the Police service.

3.2 HMIC concluded that “Greater rigour in the implementation of management information policies is required so that all forces are brought up to the standards of the best.” As a result of these findings, ten recommendations were made, six of which were addressed to Chief Constables. The Force position is set out in the attached action plan

4. CONCLUSION

4.1 Thames Valley Police recognises the importance of effective information management and welcomes the national focus being given to this area. However, some of HMIC’s recommendations are challenging in terms of cost and timescales, and dependent on delivery of other recommendations made to the College of Policing. The Chief Constable of the Durham Constabulary is also seeking to establish a national approach where possible, and the recent moratorium imposed by the Goddard inquiry also adds another layer of complexity.

4.2 In the circumstances the attached action plan is viewed as a proportionate response and its contents will be reviewed and monitored through the Information Governance Board.

Building the Picture - TVP action plan

Recommendations to Chief Constables	Action	Owner	Target date
<p>Recommendation 1</p> <p>By 30 November 2015, chief constables should ensure that a review is undertaken of the way in which their forces' information management policies and practice comply with the APP on information management so that they give effect to the national approach and minimise any divergence from that APP.</p>	<ul style="list-style-type: none"> Identify and document deviations using MoPI self-assessment questionnaire Implement annual review process 	<p>JIMU</p> <p>JIMU</p>	<p>November 2015</p> <p>November 2015</p>
<p>Recommendation 3</p> <p>By 30 November 2015, chief constables should carry out systematic audits in their forces to identify the extent to which locally-adopted practices and procedures conform to the APP on information management.</p>	As for Recommendation 1		
<p>Recommendation 4</p> <p>By November 2015, chief constables should ensure that adequate local information management process are in place to consider all available information in an efficient and systematic way so that the continuing levels of risk that individuals pose to communities are properly assessed and, where necessary, information is recategorised and linked.</p>	<ul style="list-style-type: none"> Continue with legacy indexing project for paper records Review options for addressing duplicate nominals within Niche RMS 	<p>JIMU</p> <p>JIMU / ICT / Niche Team</p>	<p>60% completion by November 2015</p> <p>November 2015</p>
<p>Recommendation 5</p> <p>By November 2015, chief constables should ensure that their local information management processes adequately identify and prioritise the records of those who pose the greatest risk, in order that they are properly monitored, and appropriate, timely action is taken.</p>	<ul style="list-style-type: none"> Continue with manual risk-based processes until Niche RMS functionality in place to automatically assign MoPI groupings Review manual processes and ensure they are still fit for purpose 	<p>JIMU</p> <p>JIMU</p>	<p>Timescales to be confirmed (dependent on other Force priorities for Niche RMS implementation)</p> <p>November 2015</p>

Recommendations to Chief Constables	Action	Owner	Target date
<p>Recommendation 6</p> <p>By 30 November 2015, chief constables should put in place arrangements to scrutinise audits of compliance with the APP on information management through the force information management governance structure. This should include measures to ensure that categorisation of records are regularly adjusted.</p>	<ul style="list-style-type: none"> Propose a light touch, risk-based audit in response to MoPI self assessment and Information Asset Owner questionnaire outcomes to the Information Governance Board 	JIMU	November 2015
<p>Recommendation 8</p> <p>Immediately, chief constables should make sure that their force information records are reviewed at the end of the review period set for each information grouping, and records created when decisions are made to retain information beyond the applicable period of retention.</p>	As for Recommendation 5		