APPENDIX A – INFORMATION MANAGEMENT

HMIC BUIDLING THE PICTURE – RECOMMENDATIONS TO CHIEF CONSTABLES

Recommendations	Progress
1. 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.	The Constabulary's Information Management Strategy and Policy has been reviewed and updated. They will be revisited when the review of the APP has been completed, as per the Recommendations 7-9; these Recommendations are addressed to the College of Policing. Associated policies and procedure will be reviewed within the 'MOPI audit/ benchmarking exercise' that is to be undertaken in 2016. Update : 14 March, 2016 The MOPI auditors took up post in February 2016, and work has now commenced to further review force Policies and procedures.
3. 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.	Two Temporary MOPI audit posts have been established. Recruitment has commenced and it is expected that the posts will be filled by 31 January, 2016. An audit of practice and procedure will then commence and is expected to run at least until July. Update : March 2016 Audit work commenced in February 2016 and a review of Force policy and practice against APP guidance is underway.
4. By November 2015, chief constables should ensure that adequate local information management processes are in	Work is on-going in relation to the development of the 'primary nominal' solution as part of the on-going ICT

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.	strategy. Update : March 2016 The 'MOPI audit/ benchmarking exercise' will seek to further identify any gaps/ issues that might need to be considered.
5. 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.	The 'MOPI audit/ benchmarking exercise' will seek to further identify any gaps/ issues that might need to be considered. Update : March 2016 Audit work commenced in February 2016 and any gaps in records management practices will be highlighted to the Information Governance Board.
6. 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.	The Constabulary already has an audit plan in place for 2015/16 and a number of IM audits have been conducted during 2014/15 and 2015/16; however, progress against the Plan in 2015/16 has been hindered by staff abstractions. The outcomes are presented to the Information Governance Board, chaired by the Force SIRO, which also monitors progress against recommendations. Consideration will be required in due course as to what manual interventions might be required to enable the appropriate reviews of record categorisation, and whether they should subsequently be retained or deleted. (see Recommendation 8). Update : March 2016 Audit Plan for 2016/17 drafted and will be presented to the Information Governance Board in April for approval.

8. 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.	Presently, system deletion of information is being factored in to the system development/ replacement programme. However, manual interventions will also be required to ensure records are reviewed and retained as per their grouping in order to ensure legal compliance and operational effectiveness.

Consideration of these issues around the Review, Retention and Deletion (RRD) requirements will be informed by the findings from the 'MOPI audit/ benchmarking exercise', system developments and guidance which may arise from the National Action Plan.

Update : March 2016

Audit work commenced in February 2016. This includes engaging with all parts of the force business to identify present weeding practices. This will then be considered against local/ national policy and NPCC guidance relating to records management.

Force Records Manager post is expected to be advertised in March, 2016. |

NB. Recommendation 2 is addressed to the Home Office and National Lead for Information Management. Recommendations 7, 9 and 10 are addressed to the College of Policing.