

The Rt Hon Theresa May MP
Home Secretary
2 Marsham Street
LONDON
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10 March 2016

Dear Home Secretary

HMIC Inspection: 'Building the picture: an inspection of police information management'

In line with my statutory responsibilities I am writing in formal response to the HMIC 'Building the picture: an inspection of police information management' from 2015. Whilst I appreciate that some time has elapsed since the publication of the report this does afford me the opportunity to provide a more considered response now that Dorset Police have had time to fully consider the report recommendations and implement any required changes.

The recommendations from this inspection are owned by the Information Management Board (IMB) and I can update as follows:

Review periods

At the time of the inspection Dorset Police had robust Review, Retention and Disposal (RRD) processes in place. Since the introduction of the NICHE RMS system in May 2015 the Force has continued to work with the suppliers to develop the system and the required functionality in this area.

Authorised Professional Practice (APP) compliance

The Force has amended their Records Management Policy to reflect the fact that APP on Information management has superseded the Management of Police Information (MoPI) guidance 2010. The RRD Policy has been updated to reflect the introduction of NICHE. Dorset Police also continues to meet its obligations to the public where requests are made to amend or delete local or PNC records, with all such requests fully investigated.

APP compliance audits

The introduction of NICHE has created some complications through the loss of previously existing auto-delete solutions, within guidelines, for certain categories of records. Dorset Police and Hampshire Constabulary are the lead forces nationally for NICHE MoPI RRD and have written the product specification document. Work continues with the system supplier to develop, test and implement automated solutions within NICHE.

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The Data Protection Officer within force is responsible for auditing compliance with the APP on Information Management.

Local information management processes

The Dorset Police Records Management Team are able to review information from a number of source locations. All MoPI review staff have appropriate levels of access to effectively enable the examination of data held and assist in the review process. The ongoing NICHE development work will also lead to a resumption of RRD work and greater assessment against APP and Data Protection Act principles.

An onus remains on ensuring that golden nominals are created and linked appropriately, with the Information Management Unit (IMU) acting as a firewall for any cases where this is not done by officers involved in the case.

Prioritisation of records in accordance to risk

Whilst RRD solutions continue to be developed for the NICHE system the Force has sought to ensure that no data is being disposed of where it might be relevant to the Goddard or Pitchford enquiries. They have therefore developed a structured and reasoned list of 'signal' criteria as part of the MoPI review process to ensure that risks to the public are further minimised. At an operational level, Dorset Police has robust methods where by those posing most risk are effectively monitored and managed.

Governance structure

Information management remains part of the Deputy Chief Constable's (DCC) portfolio as the Senior Information Risk Officer (SIRO) for the Force. The DCC chairs the Information Management Board which governs all aspects of information management.

The Chief Information Officer (CIO) is responsible for Information Assurance and Security; Data Protection; and Freedom of Information. The Data Protection function retains responsibility for auditing Force compliance with MoPI.

The Information Management Unit (IMU) retains responsibility for records management, led by the Information Manager under the strategic leadership of the Head of Corporate Development.

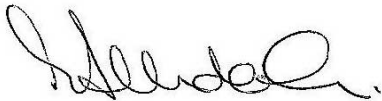
The CIO, Information Manager and Head of Corporate Development are all members of the IMB. My office is also invited to be represented and I attend IMB meetings on occasion. Upon the release of APP, the Board oversaw a full audit of changes and requirements for compliance with the new guidance. The IMB also considers the findings of regular audits of data relating to specific business areas conducted across the Force.

There is no question that the implementation of a new records management system last year has presented a number of significant challenges to Dorset Police with regard to some of the technical solutions and processes required to manage information effectively and to meet APP requirements. However, this response hopefully goes someway to demonstrate the level of importance placed on this area of business by the Force, the many robust arrangements that

are already in place and the ongoing work to further enhance the NICHE system and ensure full compliance with all requirements.

I can confirm that I have consulted with the Chief Constable in formulating this response and trust that this provides you with the necessary reassurance around action being taken locally by Dorset Police in response to the relevant HMIC report recommendations.

Yours sincerely



Martyn Underhill
Dorset Police and Crime Commissioner