

group 3 described in paragraphs 53 and 5 involves automatic destruction of such files at the end of their retention period. This was previously 12 years but is being reduced to 7 years at present. It is possible that files relevant to some undercover deployments could exist in MoPI group 3 and therefore be at risk of automatic destruction. For example, deployment of a foundation level undercover officer to pose as purchaser of stolen property of low value. I have discussed this risk with the head of MPS Records Management. AC-PIT are currently reviewing information held in relation to undercover operations. Information recovered will be cross-referred by AC-PIT against RMS and, if necessary, local archives, to locate and secure the relevant files.

76. Update to paragraph 20. In this paragraph I describe paper files held in local archives or 'file on division.' I wish to point out that case files relevant to crime investigations should only be held in local archives or 'file on division' if MoPI group 3. Administrative material under MoPI group 4 (miscellaneous) is also usually appropriate to be held in local archives. Case files relevant to investigations of more serious crimes under MoPI groups 1 and 2 should be submitted to GR. However, work conducted for Operation Filesafe has identified that this policy has not been fully complied with over many years resulting in significant quantities of MoPI group 1 and 2 files being located in local archives. Due to the work of Operation Filesafe these files are now being recorded under RMS and transferred to GR.
77. Correction and update to paragraph 50. In this paragraph I state that the only IT system in use by the MPS with automated deletion of records is NSPIS. Since completing my earlier statement I have sought further information around this system and am advised by Met Detention that custody records held on NSPIS are archived by the commercial operator of the system. I have not yet been able to confirm with the commercial provider what the process is for archiving records and how the MPS could recover any such records. As the system was only introduced in 2005 it is unlikely that any custody records held on it would have been considered for RRD as until the recent change to MPS retention periods described in paragraph 71 records related to crime

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investigation attracted a retention period of at least 12 years. I have directed a spot check of records from 2005 at the BOCU that first introduced NPSIS in the MPS. Custody records related to even very minor offences are still present on the system and therefore recoverable.

78. Update to paragraph 55. I am informed by the MPS Head of Records Management that he intends to augment the internal audit programme referred to in this paragraph with a MoPI self assessment process for BOCUs to complete. He has also commenced contact with the National Archives Information Management Assessment team to establish an external audit process.
79. Correction to paragraph 60. I am informed by the MPS Head of Records Management that he did not find it necessary to recruit outside Agency staff for the Operation Filesafe team as he was able to arrange for re-deployment of nine MPS police staff to form this team.
80. Update to paragraphs 69. I am informed by the MPS Head of Records Management that the anticipated date for conclusion of Operation Filesafe review of local archives and deep storage is now March 2018.

**Verification following rule 9(12) request**

81. The following steps have been taken to verify that the instructions given to officers to preserve material relevant to the UCPI has been received and followed:
  - a. In relation to AC-PIT officers and staff, I and the AC-PIT Detective Inspectors have ensured that the importance of the message relating to document preservation by verbally reinforcing the message at AC-PIT regular meetings. This reinforcement and the measures relating to document handling set out at paragraph 32 of my statement in

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response to rule 9(10)(a) mean that I believe the message has been received and is acted upon by AC-PIT officers and staff.

- b. In relation to GR, I am informed by the head of Records Management that he has verbally reinforced the importance of preserving documents to each member of the GR staff involved in RRD decision-making, reinforcing the message to preserve relevant documents.
- c. In relation to IMOS, I stated the following at paragraph 49 of my statement in response to rule 9(10)(a):

*"There is a direction in place that no material held by IMOS will be subject to destruction or deletion while the UCPI is ongoing. This is a suspension of the RRD process. This has been justified as an exception to the Management of Police Information requirement not to hold information once it does not serve a policing purpose on the basis of the potential relevance to the UCPI."*

This is relevant to the present request as any destruction of documents would be noticeable. I am not aware of any such destruction having taken place. I therefore think that the message of retaining documents has been received and followed at IMOS and there is a measure in place that helps to prevent inadvertent destruction of relevant material.

- d. I am informed by the head of Records Management that the staff and officers working on Operation Filesafe have been briefed verbally at meetings to ensure that the requirement to preserve documents relating to the UCPI is understood and followed. These individuals oversee large scale office moves and will intervene if relevant documents would otherwise be destroyed. I am aware of two occasions when people working on Operation Filesafe have prevented material from being destroyed though this was not material relevant to the UCPI. I have personally been contacted by units conducting reviews to

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ask for advice on the process to follow and potential relevance of material which indicates to me that the message to preserve relevant documents has been received and understood by those individuals.

- e. In relation to the wider MPS workforce, I directed Operation Filesafe be conducted on a staggered basis to ensure that BOCUs received appropriate support to implement the new process. The support for Operation Filesafe is intended to ensure that the reviews are conducted in accordance with the Records Management policies and toolkit. To date Operation Filesafe has worked with BOCUs to review over 500,000 files. This volume of work can only be implemented with the support and cooperation of senior leaders who have been briefed and instructed as I describe in paragraphs 40, 41 and 42. BOCU Commanders have allocated staff locally to conduct these reviews assisted by Operation Filesafe. The fact that such a large quantity of material has been reviewed to date indicates to me that the directions described in my statement above have been received and are being acted upon.

82. In addition, the MPS intends to take the following steps:

- a. Create a list of known undercover operations which could be used to restrict access to relevant files at GR. This will help to prevent inadvertent destruction of documents by ensuring that those files are not removed from their current location. Access to the list will be restricted.
- b. The head of Records Management has agreed periodically to review a sample of the files at GR for which access is restricted for the reason of relevance to the UCPI to see if files are being requested. This should assist in preventing inadvertent destruction.

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- c. The head of Records Management has agreed to instruct GR staff to review case files in more detail for relevance to the UCPI when the case file is subject to a RRD decision.
- d. AC-PIT are engaged in identifying local archives with relevant material. In this process, the importance of preserving relevant material is reiterated to borough officers and staff that have been contacted, which I believe will help to verify that the message has been understood and followed.
- e. The Department of Professional Standards (DPS) has a project in place (running from 2014) to create a fully searchable record of all DPS anti-corruption investigations. This will assist in identifying DPS relevant material, though it is not yet complete. The scale of the operation (to the best of my knowledge, digitising approximately 3,000 crates of documents and costing approximately £1.35 million) means that I do not believe the process can be speeded up for the UCPI nor can further resources be allocated to it for the purpose of the UCPI.
- f. To review the measures to ensure that the instructions not to delete material have been received and are followed every six months.

83. I have considered the following further steps:

- a. Requesting individual verbal briefing about the UCPI to each MPS officer and member of staff;
- b. Preventing all destruction of documents by MPS staff or officers;
- c. Checking all documents that are to be destroyed for relevance to the UCPI;
- d. Circulating a list of all known undercover operations widely;

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- e. Isolating all case files that contain documents relating to the use of undercover policing.

84. I have not decided to take these steps for the following reasons:

- a. The measures taken to date are the most effective available ways to spread the message to preserve relevant documents to the largest possible number of staff and officers. My experience is that the intranet is amongst the first port of call for the majority of officers when they start duty and staff when they arrive at work. The home page of the intranet is the home page for web browsers on MPS computer system terminals. Having a message displayed on the home page of the intranet enables the largest possible number of officers and staff to read and consider it.
- b. The MPS has a workforce of approximately 42,000 individuals, making personal briefings impracticable. I have however circulated the message to preserve relevant documents on the MPS briefing system (Met Bats) used by all operational units to deliver daily briefings to officers. Met Bats briefings are delivered by supervisors to teams as they go on duty and are regularly reviewed by officers working independently. A combination of Intranet and Met Bats circulations are therefore the most effective means of cascading messages across the force. Individual BOCUs may have circulated their own internal messages to officers and staff such as the direction given to all SO15 officers and staff (D751).
- c. Operation Filesafe is a major operation that engages with BOCUs to advise and assist their review of local archives. From members of this operation, the message to present relevant documents is spread to MPS boroughs.

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- d. The day-to-day work of the MPS requires material to be destroyed for good reasons, including preventing sensitive material from being distributed inappropriately, complying with legal obligations such as data protection law and preventing working areas from becoming overloaded by paper. Given the number of buildings in the MPS estate and the amount of paperwork generated by police work, preventing all destruction of documents would affect the ability to run a police station massively.
- e. Circulating a list of all known undercover operations is likely to create serious security risks as for some cases the use of the tactic will be operationally sensitive.
- f. It is not obvious on the face of many (if not all) case files that undercover policing was used. There is no easy way of identifying case files with relevant information inside. To isolate all such files would require reading all case files at GR and in local archives relevant to crime investigations where the tactic may have been used. This would require a huge team of officers employed full time, which is not something for which the MPS has resources. MPS Records Management report that there are around 1.35 million GR files, each file can vary in size from one sheet of paper to 100 plus boxes of material. The MPS does not have an accurate figure for how many crime investigation files are held in local archives but calculating from total recorded crime against average retention periods generates a figure of around 6.5 million. These figures are only for crime investigation files and do not include files that may contain other relevant information such as policy files, administrative files and personnel files. These figures also do not include general administrative material held in offices which are not required to be categorised or retained under MoPI.

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85. For these reasons my focus has been to improve the searchability and security of local archives, deep storage and relevant systems and to generate records of potentially relevant investigations.
86. The fact that I have not decided to take the steps described in paragraph 83. does not mean that I consider the matter closed. In addition to considering the issue of verifying that the message to preserve relevant material has been received and is acted upon specifically at the periodic review, I remain open to considering other methods and will institute further means to achieve this as appropriate.
87. The UCPI have requested supplementary information which I address as follows:
- a. The UCPI have requested further information regarding the Independent Scrutiny panel used by the MPS. This group was established in 2014 to provide independent advice to Assistant Commissioner Professionalism. The group was initially referred to as the Independent Oversight Group. The panel is chaired by Lord Justice Peter Jacobs, the other two members are Margaret Casely-Hayford who works in the voluntary sector and Karen McFarlane who is an expert in public sector information management. The committee will remain entirely independent of the MPS and will not replace or replicate any of the statutory oversight and governance functions of The Mayor's Office for Policing and Crime (MOPAC). The role of the panel is:
- To provide an independent review and comment on the strategic approach taken by the Public Inquiry Team in response to all of the investigations and enquiries outlined in the introduction above.
  - To provide an independent review and comment on the strategic approach taken by the Public Inquiry Team in

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response to any additional taskings or activities as requested by Assistant Commissioner, Professionalism.

- To provide an independent review and comment on developing plans to improve records management and document retention within the MPS.
- Where the MPS are required by any of the investigations or enquiries to provide a specific response, to provide an independent review and comment on the proportionality, thoroughness and openness of the response.
- To provide an independent review and comment on the effectiveness with which emerging organisational learning from the Public Inquiry Team is embedded within MPS practice.
- The committee will receive access to any requested documentation unless a specific and recorded decision by AC Professionalism prohibits such access.
- In order to fully discharge its function, the committee will be able to speak to any MPS employee.
- To provide an independent review and comment on proposed media plans at key points in the work of the Public Inquiry Team.

Whilst the panel exchange with the MPS their comments and views on the approach to the UCPI they have not presented findings, reports or conclusions subsequent to these discussions. It is not anticipated that any such reports will be provided.

- b. Update to paragraph 32. This paragraph states that managers responsible for key systems such as INFOS and IMOS have been briefed. There are a large number of systems in the MPS which may contain relevant material as explained previously to the UCPI. Paragraphs 40, 41 and 42 outline briefings delivered to a wide range of senior MPS officers and police staff. These briefings and e mail circulations have highlighted the need to retain relevant material and

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have effectively covered senior and mid-level managers responsible for systems where relevant material may be held.

- c. Update to paragraph 48 (v). INFOS holds detailed records of operations from the years reported in this paragraph. The INFOS systems also holds records relating to undercover operations prior to those dates however these records are incomplete. The earliest of these records identified to date is 1991.
- d. Update to paragraph 48 (vii). IMS stands for Informant Management System. The MPS computer database used by SC&O35 for CHIS handling is referred to as IMS. However SO15 and DPS both operate their own separate systems for handling CHIS as I described in paragraph 65. These are also referred to as IMS.
- e. Update to paragraph 53. A small number of Records Management staff are engaged in rolling Review, Retention, Disposal (RRD) decisions regarding General Registry files. As I explain in paragraph 81(b) they have been verbally briefed to identify and retain material of potential relevance to the UCPI. Files relating to MoPI group 1 and 2 offences are examined prior to a decision being made to destroy and any decision to destroy must be counter-signed by the Head of Records Management. Once a decision is made to retain a file it will not be reviewed again for destruction for 10 years. Any relevant files identified during RRD review will be flagged to AC-PIT. As of 2016 a new process is being implemented whereby MoPI group 3 files are destroyed after reaching their retention period. In order to prevent automatic destruction of any such files which may be relevant AC-PIT have commenced development of a list of all undercover operations identified which will be cross-referred to RMS records to flag any relevant MoPI group 3 files for retention. I have further determined to flag all file types relevant to units known to have had the capability to deploy the tactic or who regularly use the tactic in more complex

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investigations/operations. Once flagged files will not be subject to RRD for the duration of the UCPI and will not be released to any individual requesting them without the authority of the Head of Records Management.

**Appendix 1. Timeline of delivery of Op FileSafe**

May 2014	DSU Hutchison appointed to lead
May 2014	DAC Rodhouse requests Tactical options paper regarding direction from Management board to conduct 'sweep' of all MPS controlled premises for incorrectly filed materials
May/June 2014	DSU Hutchison submits Tac options paper for delivery of FileSafe
June 2014	Information Management Steering Committee briefed on Strategic User requirement for system to enable scanning of corruption archives into digital system
June 2014	AC-PIT commence working with MPS Records Management to review policy and processes
June 2014	AC-PIT requirements analysis identifies first serious risk to

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	delivery in lack of corporate Information Asset register (IAR). Identified wide range of existing corporate databases with limited consistency and compliance in use, no central search capability and no ability to generate compliance data. Consultation with National archives identifies this as serious risk to delivery of strategic objectives. Digital Policing engaged to provide solution.
June 2014	Briefing paper and tactical plan submitted to AC Hewitt (D770).
June 2014	AC-PIT begin identifying Senior Designated officer for all 443 buildings in MPS estate to lead on 'sweep.'
June 2014	AC-PIT identify second serious risk to delivery. MPS deep storage facility has very limited records of material held other than crime files recorded on RMS. Evidence of very large scale submissions of files to deep storage without effective, searchable records maintained of what submitted.
30 June 14	AC-PIT submit briefing note to AC Hewitt highlighting risk to delivery and resourcing requirements. DSU Hutchison recommends extending time period for delivery of FileSafe to address risk to delivery (D767).
July 14	Information Asset Register High level IT requirements supplied to Digital Policing/Chief Technical Officer
July 14	AC-PIT identify third serious risk to delivery - Shared Support Services provide details of documentary material currently held in local archives. This scoping identifies categories of material filed locally which should be held in General Registry and recorded on RMS
July 14	Digital Policing submit Initial Viability assessment for IAR
July/Aug 14	BOCU appoint SPOCs who are provided guidance from Op FileSafe on reviewing Records management
Aug 14	AC-PIT identify fourth serious risk to delivery. Role of Information Manager on BOCUs is vacant in a number of areas and some staff lack skill and training in role
Sept 14	Digital policing major change application considered at CTO

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	steering group. [REDACTED]
Sept 14	Commencement of FileSafe Steering and Working groups (D765 & 766)
Sept 14	Briefing note on 'Progress on reform of MPS Records Management' submitted to AC Hewitt (D768)
Oct 14	Op FileSafe commence pilot at Croydon BOCU
Oct 14	Op FileSafe strategic plan considered by Independent Scrutiny panel
Oct 14	DSU Hutchison submits scoping and options paper to AC Hewitt re delivery of FileSafe. Papers identify a number of delivery risks and propose options to progress (D763 & D764)
Oct 14	Application submitted to set up Small Projects team within Digital policing to deliver IAR solution
Oct 14	Briefing delivered to all designated Local Service Delivery Managers (LSDM) regarding FileSafe. Includes requirement to retain all material potentially relevant to the UCPI
Nov 14	Op FileSafe review existing MPS Information directory previously developed to provide an IAR for locally archived material. Determined that re-commissioning of this directory was unlikely to meet the identified business need
Nov 14	Following engagement from FileSafe NCTPHQ determined that as MPS have no jurisdiction over the unit they were not required to comply with FileSafe directions but would remain engaged in order to identify and follow best practice (D772)
Nov 14	Presentation delivered to MPS Prosecutions Senior Leadership team including need to identify and retain material relevant to UCPI
Nov 14	Records Management toolkit approved by Commissioner
Nov 14	Digital policing present to Information Management steering committee re progress on high level IAR project. Having researched five options for an interim solution the only option available for use in the pilot was a locked down Excel

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	spreadsheet. DP reported progressing set up of Small projects team to deliver [REDACTED]
Dec 14	Op FileSafe commences engagement with Property services team leading on closure of disposed MPS properties
Dec 14	Small projects team approved by Investment board and procurement commences re [REDACTED]
Dec 14	Croydon pilot identifies that large proportion of files apparently stored in deep storage cannot be found. A significant proportion have been incorrectly archived rather than submitted to General registry. Policy decision made to retain GR material for 1 year on BOCU before submission to avoid swamping GR. Further policy decision to retain other local archive material for maximum of 2 years on Borough before submitting to deep storage
Dec 14	Communications plan for roll out developed with Internal communications yet. Internal comms
Jan 15	Communications strategy developed to be rolled out across BOCUs. Includes need to flag up any identified UC material to Op Beacon and proforma to submit in relation to material identified
Jan 15	FileSafe creates a scoping and options paper in relation to identified risk in relation to MPS deep storage facility. Paper recommends engagement of Agency staff to conduct review of material, identify lost files, destroy when appropriate and develop an accurate and populate Information asset register
Jan 15	FileSafe agree with Property services that rollout will prioritise buildings scheduled for disposal. This is a less efficient and more high risk strategy than roll out on a territorial BOCU basis as planned. However business planning to achieve cuts to MPS budget is likely to lead to disposal of majority of current MPS real estate over the next few years. These premises need to be prioritised to clear them for disposal and ensure material not lost or inappropriately disposed of during the clearing process
Feb 15	FileSafe roll out plan designed to cover all MPS by Mar 2016

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Feb/Mar 15	Dedicated FileSafe Intranet site established as one stop location for policy and guidance on new RM processes and implementation of FileSafe. Launched with Intranet article to introduce new Records management process and toolkit. Article in the Job magazine which mentions FileSafe team looking to identify any material relevant to undercover policing. Process wire diagram for material being reviewed contains specific reference to identify undercover related material and report it to FileSafe team
Feb 15	FileSafe identify risk to delivery re capacity of Met prosecutions and SSS to process material. Options paper submitted recommending engagement of Agency staff (D788)
Mar 15	Strategic update provided to AC Hewitt (D786). Identifies key risk with files incorrectly stored in local archive rather than General registry (estimated 300,000 files requiring transfer to GR and inputting to RMS)
Mar 15	Roll out plan reviewed following learning. Estimated completion date Feb 17. Decision that all roll out to be supported by dedicated RM team will delay completion but maintain QA and enable training
Apr 15	Op FileSafe present business case recommending NCALT_014_02_00 NCALT (Lawful Handling of Information) and NCALT_056_02_00 (MoPI Module 2&3: Collection and Recording) packages to be made mandatory for all staff. Estimated opportunity cost to organisation in excess of £2 million (D787)
Apr 15	Op FileSafe internal Communications strategy updated (D771)
June 15	E mail to all Chief Officer Groups, Borough and OCU Commanders, Area Service Delivery Managers and Local Service Delivery Managers regarding emerging problem with backlog of non-charged volume crime files due to LSDM teams having insufficient resources to cope with workload handed over from Met Prosecutions
June 15	Digital Policing report have cancelled [REDACTED] and Small

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	projects team projects. Insufficient resources to progress at present due to need to service higher priority projects
June 15	PSD requested to provide overflow site to cope with storage of material located via FileSafe and submitted to GR
June 15	Digital Policing propose scoping [REDACTED] as a more suitable solution to IAR requirement
July 15	Submission of Risk and blockages paper in relation to FileSafe to AC Hewitt
July 15	Submission of resources paper to Management board requesting dedicated team and budget to support the UCPI. Paper requests £750,000 funding for Agency staff to support roll out of Op FileSafe
July 15	Briefing note submitted to AC Hewitt re progress in relation to tackling criticisms of MPS Records management made in SLIR (D759)
July 15	Management board agree allocation of £500,000 from Major change fund for Agency staff to support RM team in delivery of FileSafe
Aug 15	AC-PIT complete spreadsheet on current MPS IT corporate and non-corporate systems (565) and identify those IT systems and paper archives likely to contain material potentially relevant to the UCPI (88).
Oct 15	RM team complete review of security arrangements at MPS deep storage facility
Dec 15	6 Agency staff join Records Management FileSafe delivery team funded by £500,000 allocated in July 15

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**Appendix 2: Operation FileSafe progress report to December 2015**

D773 refers:

To date under Op FileSafe 159,909 paper records have been reviewed:

- Approx 500 missing registry files have been recovered to date.
- 112,454 records have been sent to TNT [REDACTED] for deep storage.
- 39,602 have been reviewed and destroyed in line with RRD policy
- 7,853 records have been added to RMS in the last month.
- 32,000 misfiled serious crime files requiring registration have been identified.
- From January 2016, all records will be recorded on RMS due to inability of Digital Policing to deliver an Interim Asset Register. All records recorded on spreadsheets will be re-keyed onto RMS.
- In November, 37,000 Camden & Islington logged records were sent to TNT from the Op FileSafe holding archive in [REDACTED]
- As part of the NSY closure programme, senior officer private offices based at NSY have commenced the transfer of confidential records to - TNT [REDACTED]
- To improve the quality and quantity of properly registered files, we are working with SC&O and Met Prosecutions teams to train them in RMS input. To date we have **trained 173** additional officers and staff.
- We have now cleared 32 local archives
- SCO4, SCO8, SO20, Merton, Newham, Barnet, Kensington & Chelsea, Hammersmith & Fulham BOCUs are all currently engaged with archive clearing.
- Work continues at Corporate real estate exiting and receiving sites including NSY and ESB.
- In November, 84 records were returned to the National Archives. Plans are in place to transfer a further 1,000 records currently held at Hendon.
- A meeting was held with SCO5 to ensure that historic GN88 (older child abuse/non-accidental injuries records) are properly managed under revised governance to meet additional requirements arising from the Goddard Inquiry. A follow up consolidation is scheduled for December.

1. An additional six fixed term staff joined the delivery team in December following allocation of funding in July 15. This will enable the project to get back on track for scheduled completion by March 2017. From current experience we expect to manage over 6 million records between now and

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March 2017. Better processes and direct support from devolved responsibility to officers and staff will allow us to achieve the targets.

2. The primary goal of a sweep of the entire estate and the proper logging and archiving of all material requiring registration will be met. In addition we expect to deliver significant improvements in the management of all MPS records and our alignment to MoPI standards.

**Mapped FileSafe Intervention @ Nov '15**

Note: All specialist OCUs are picked up in Borough location activity. The programme is prioritised by CRE building closures

Not started
Engaged
Underway
Nearing completion
Completed

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