

Operation FileSafe - Information Management

Information Assurance and Security Board - 15 July 2015

Report by DI Ellie Pyemont and DI Penny Coombe on behalf of Assistant Commissioner Martin Hewitt

EXECUTIVE SUMMARY

This paper describes the current Information Management risks within the MPS in relation to management of documentary records.

This paper sets out the current blockages to progress of the Op FileSafe programme to ensure documentary files are correctly archived and recoverable. The paper sets out possible short, medium and long-term solutions.

A. RECOMMENDATIONS

1. That Management Board immediately uplifts Information Management (IM) resources to support the Corporate Real Estate exit programme, Op FileSafe and roll out of refreshed Records Management (RM) Policy.
2. That Management Board create the post of Archivist within the Shared Support Services (SSS) model to provide sufficient resource to manage business as usual archiving of volume crime and other material.
3. That Management Board prioritise IM strategy as a critical area of MPS business, allocating core function status to RM in particular, and investing in an Electronic Document Record Management System (EDRMS).

B. SUPPORTING INFORMATION

Background

1. Information Management, encompassing Records Management, is a key risk area for the MPS as highlighted by reviews and inquiries (Stephen Lawrence Independent Review, Operation Herne, Daniel Morgan Independent panel and investigations into the May 2012 Report and Shredding Allegations). Information risk permeates all areas of MPS business; effectiveness in combating crime, compliance with Management of Police Information, Disclosure, Data protection and Freedom of Information legislation, cost effective use of resources and public confidence in the MPS.
2. Operation FileSafe was launched as part of the MPS response to the Stephen Lawrence Independent Review. Mark Ellison QC stated that he believed he had received 'genuine cooperation' but found that; 'the potential to uncover relevant material or information [...] is almost without limit' (SLIR, 2014, p.5) and that there were 'a number of potentially important areas of documentation that have not been provided'. His explanations for this are:
 - a) a suspicion (or sometimes hard evidence) that they have been destroyed;

- b) a belief that they must exist but cannot be found; or
- c) that there is simply no record available and no way of knowing if one was ever made.'

3. Mark Ellison QC considered that, despite its powers, a Public Inquiry may find difficulties in uncovering evidence, stating 'Fundamentally this is because of the chaotic state of the historical records held by the MPS. There are incomplete records of the moment; files have been destroyed; and the MPS uses a multitude of file-logging systems. In addition, a natural depletion of records will have occurred over time.' (SLIR, p.16)
4. The most fundamental requirement of effective Information management is a corporate Information Asset Register (IAR) capable of review, retain and destruction functionality and providing an auditable governance function. Given the resources deployed to locate material relevant to historic enquiries and criticisms of MPS Information management (IM) the lack of a system to ensure accountability for documents will result in future challenges and failures to recover or appropriately dispose of material. Failure to comply with obligations to systematically review and destroy damages public confidence and could lead to punitive fines for failure to comply with information law.
5. In an interview to the BBC, broadcast on 8 March 2014¹, the Commissioner said; 'Frankly, I need to reassure myself that we're making our best search for all the information we have', describing the scale of the task as 'immense'. In this interview, the Commissioner set out the parameters and challenge for what would become Operation FileSafe; 'in fact actually searching every building that we have, every computer that we have is quite a difficult task'. The Commissioner highlighted the competing pressures of reducing MPS estate while conducting searches for relevant material.
6. The challenge of Information Management within large public sector organisations was addressed in a National Archives² report 'Information Management Assessment' (March, 2015). The report found that; 'Information and records management [was] often seen as an additional, burdensome task [...] of secondary importance compared with the core business functions of the organisation, Information Asset Registers (IARs) [...] often not being used to full effect and that there [was] often a disconnect between IT and KIM (Knowledge and Information Management) professionals'.
7. In May 2015, the Information Commissioner's Office (ICO) published findings from reviews and audits of police forces³. Again, the general findings were pertinent to Operation FileSafe and the IM challenge facing the MPS, citing a particular case where the ICO issued a Civil Monetary Penalty to a police service where sensitive personal data was left in a former police station. The lack of an MPS-wide Information Asset Register with full review and performance functionality will inevitably lead to the MPS facing a similar findings. The ICO identified 'Common themes include lack of progress towards

¹ BBC News, (2015). *Hogan-Howe vows to restore trust in Met after new Lawrence row* - BBC News. [online] Available at: <http://www.bbc.co.uk/news/uk-26485664> [Accessed 9 Jul. 2015].

² The National Archives, (2015). *IMA reports and resources - The National Archives*. [online] Available at: <http://www.nationalarchives.gov.uk/information-management/manage-information/ima/ima-reports-action-plans/> [Accessed 9 Jul. 2015].

³ Information Commissioner's Office, (2015). *Findings from the ICO audits and follow up reviews of police forces*. [online] Available at: <https://ico.org.uk/media/action-weve-taken/audits-and-advisory-visits/1431797/police-forces-audit-and-follow-up-report.pdf> [Accessed 9 Jul. 2015].

creating and maintaining an information asset register (IAR)'. This has particular relevance to the MPS and the third recommendation of this paper.

The MPS' current situation

8. Operation FileSafe has identified current trends in Information Management demand across the MPS in light of organisational change programmes. The table below indicates areas of demand increase and decrease with timescale indications.

Records Management Demand Management			
Temporary demand increase	Permanent demand increase	Temporary demand decrease	Permanent demand decrease
CRE Exit uplift	Introduction of QA for interim IAR	None identified	iPads
Op FileSafe amnesties	Back-copy conversion for local and deep storage archives		COPAS (digital case files)
Shut down of vulnerable non-corporate systems (VNCS)	Uplift in MPS-wide compliance with APP for across Information Management		Future planned policy changes (i.e. full OG file for most harmful crimes, not ABH etc.)
			Overall crime decrease
			Overall decrease in MPS headcount

9. External facilities (TNT) are used for the long term storage of MPS paper documents. Approximately 84,000 crates are currently held at a cost to the organisation of £700,000p.a. The cost for 2015/16 is anticipated to be approx £1million due to Op FileSafe and decanting of police buildings increasing quantity of stored material. Initial work undertaken by Operation FileSafe indicates a 54% inaccuracy rate within records of material stored at these locations. 650 crates have been reviewed to date.
10. Widespread non-compliance with RM policy has also been identified. In excess of 20% of material held in local archives should have been recorded on Records Management System (RMS) and stored at General Registry. To date, 62,871 local archive records have been reviewed and appropriately stored or destroyed by Operation FileSafe. It is estimated that several million locally stored records are yet to be reviewed.
11. It is a stated aim of Operation FileSafe to conduct a coordinated sweep of the MPS estate to identify any material relating to Stephen Lawrence or undercover policing, as set out by the Commissioner in the Terms of Reference for Operation Beacon. The estate currently consists of [REDACTED] buildings and would require an estimated 18606 officer

days to comprehensively search. This equates to an opportunity cost of approximately £3 million. The search has not been conducted to date, although pilots have been progressing. The initial pilots have generated a backlog of 400,000 documents awaiting submission to deep storage and 10,000 files to be entered on RMS.

Progress blockages

12. Key blockages to delivery of Op FileSafe objectives are; a lack of immediate staff to process the quantity of material being generated through searches, building exits and improved policy compliance; a lack of structure within SSS to manage the normal 'business as usual' local archiving; and a lack of a corporate Information Asset Register.

Time scale	Current situation	Blockage	Suggested solution
Short term (0-6mnths)	Backlogs of over 400,000 files awaiting registration	Insufficient trained staff to keep pace with workload	Immediate uplift with agency staff / redeployed staff
Medium term (6-18mnths)	Informal arrangement between Met Prosecutions, OCUs and SSS regarding RM policy to cover BAU demand	No provision for BAU Shared Service Support for local archiving	Inclusion in SSS service catalogue of Archivist role and creation of 24 posts
Long term (18mnths+)	Stalled, delayed and cancelled development of a viable EDRMS for the whole MPS	A basic interim IAR (an excel spreadsheet) has been developed but has no long term viability	Development or investment in a fully functioning EDRMS for the MPS

Short-term blockage and recommended solution

13. Records Management Branch are currently able to deploy a team of three permanent staff assist review of material in local archives, deep storage and identified through amnesty / sweep phases of Operation FileSafe. An additional three staff and volunteers are available to assist on an ad-hoc basis. A requirement has been made of B/OCUs to provide an additional eight staff to assist this process within their area of responsibility. With this level of resource, Operation FileSafe is conservatively estimated to require a 24 to 36 month period to complete.

14. A request⁴ has been submitted for a team of 60 agency staff to be used to support the team from Records Management Branch for a six to twelve month period in delivering the strategic intentions of Operation FileSafe. This would cost in the region of £750,000 and is included in a paper to be considered by Investment board.

⁴ Briefing note - Public Inquiry Team (PIT): Operation FileSafe - Options Paper regarding MPS unregistered archives - 03/02/2015

15. It is recommended that Management Board immediately uplift resource levels in Information Management in order to clear blockages and increase flow. This could be achieved by confirming the request for agency staff to expedite activity or by reallocation of staff currently within redeployment to this activity, thereby cutting Operation FileSafe estimated completion time from 3 years to 6 to 9 months.

Medium-term blockage and recommended solution

16. The renewed RM policy splits responsibility for managing paper files between Met Prosecutions and Shared Support Services. Without the delivery of a bespoke Information Asset Register, the need for a dedicated resource is unavoidable. At present, neither strand is able to commit to supply the staffing levels required to deliver policy. BAU activity as identified within the renewed RM policy⁵ published in January 2015 is currently unachievable. This is creating significant pressure on local administrative staff and a backlog of files awaiting registration. A demand profile has been undertaken and identified that 24 archivist roles across the MPS are required to deliver agreed policy. At present no area of the organisation has official responsibility for this.
17. It is recommended that Management Board include 24 archivist roles within the Service Catalogue for Shared Support Services. This dedicated resource will ensure that updated Records Management policy is sustainable and will enhance feasibility of corporate compliance with IM policy and legislation.

Long-term blockage and recommended solution

18. The proposed digital solution to support improvements in records management practice as described within the Initial Viability Assessment⁶ has not been delivered. Plans to develop this programme within [REDACTED] are currently deferred. This solution would have been accessible by all MPS staff and would have made each employee responsible for registering, transferring, tracking and reviewing their own material, engendering a significant procedural and cultural change. An interim solution with reduced functionality was under development but progress was halted while Digital Policing considered a possible commercially available system which they have now discounted. The interim system currently in use by Op Filesafe is an Excel spreadsheet. This provides basic functionality with no capacity to notify of RRD requirements and no provision for quality assurance or performance management. Crucially, it is only accessible and editable by nominated SPOCs, frustrating the core strategic intention of delivering cultural change and placing the responsibility for records management upon individual officers. The capacity to record data on an Excel spreadsheet is limited making this a very temporary and inadequate solution.
19. It is recommended that long-term investment in an Electronic Document Record Management System (EDRMS) is undertaken with work commencing as soon as possible. This system will allow material to be i) retrievable by logging and tracking creator, owner and location details, ii) searchable through key words, and iii) sustainable by allowing individual officers and staff to register and manage their own material. Interrogation of the EDRMS by managers will enhance quality assurance and facilitate compliance with RRD obligations through use as a performance management tool.

⁵<http://intranet.aware.mps/NR/rdonlyres/ef2wguihg73faetyxhk5jgoqv25zahw7hygkbcyq26igftv2ciy5jgazkpnd5zw3gnyejahmytedrbuzdlatmdqb3a/TableRecordsReviewRetentionDisposalv12.doc>

⁶ Initial Viability Assessment - 28/07/2014

One Met Model

20. The One Met Model has been considered throughout the development of Operation FileSafe and the renewed Records Management policy. This paper is recommending that RM roles be written into the structure of the Shared Support Service catalogue. The scale of the business-as-usual workload for RM was under-estimated during the Met Change programme. It is crucial for the future management of information risks that the same underestimation does not occur during the development of the One Met Model.

C. OTHER ORGANISATIONAL & COMMUNITY IMPLICATIONS

Equality and Diversity Impact (mandatory)

1. Recent failure to provide full disclosure to internal and external reviews and inquiries has damaged the reputation of the MPS. The allegations that police corruption was a factor in the Lawrence and Daniel Morgan murder investigations continue to effect public confidence and efforts to address these continue to be hampered by challenges to providing full disclosure. Current identified vulnerabilities in MPS Information management are evidence of corporate failure to learn from oft repeated lessons.

Financial Implications / Value for Money (mandatory)

2. Officers are regularly required to identify and retrieve documentation from storage across the MPS. This is to service requests for bad character material, support live investigations, provide evidence to employment tribunals and civil cases and respond to disclosure requests from external reviews and inquiries. Inefficient recording and indexing of material within local and remote storage facilities significantly extends the time required to locate and retrieve documentation, negatively impacting officer productivity and incurring associated opportunity cost. Failure to place IM at the heart of the One Met Model will be to fail to understand the central value of information at the heart of policing in the 21st century.

Legal Implications (mandatory)

3. The MPS faces serious risks to compliance with areas of Information Law such as DPA, FOIA, CPIA, and Public Records Act as well as its own Records Management policy. There is no functioning review process in place for the 84,000 records in deep storage and highly variable processes in local archives. Failure to locate and review material can prevent effective defence of civil claims against the MPS or lead to fines.

Consultation undertaken (mandatory)

4. The Public Inquiry Team has consulted with the Independent Scrutiny Panel (ISP), set up by AC Martin Hewitt to provide impartial strategic oversight to the MPS' response to the Stephen Lawrence Independent Review, including Operation FileSafe. The panel is comprised of senior, experienced professionals operating at a high level in law, the voluntary sector, and the Information sector.
5. The feedback from the ISP regarding IM in the MPS has been considered and extensive. The ISP is not convinced that the MPS has acted sufficiently in response to Ellison. The

ISP has stated that they believe that Information Management within the MPS is severely under resourced. The ISP took the view that the MPS had not fully recognised the value of information held by the organisation as a 'marketable asset'.

6. The ISP advised that the MPS should be considering designating IM staff as 'front line' and that a lifetime investment in a suitable EDRMS for the organisation should incur a £multi-million investment. In terms of transition to a system with IM at the core of the organisation, the MPS should consider archiving and storing shared and home drives, removing all future use of these would enable a full transition to the new system. The existence of nearly 30Tb in shared drives alone within the MPS is massive information risk, one which is not currently tackled by Operation FileSafe.
7. The ISP also highlighted that investment in IM will assist in corruption-proofing the MPS. Current and future corruption threats are more likely to relate to information as opposed to finance or property. A current IPCC investigation relates to allegations that information was withheld from the Macpherson Inquiry. A robust EDRMS would provide a level of protection against allegations of cover-up and provide a tool to prevent and detect corruption. The ISP advocate that a proportion of revenue generated by the MPS' CRE programme be invested in Information Management infrastructure. The ISP further advised that the public be consulted on the Information Management challenge, that consideration be given to the viability of outsourcing IM functions.

BAND B2

8. This paper has been submitted for consultation to [REDACTED] Head of Records Management, who is supportive of its content.

Risk (including Health and Safety) Implications (mandatory)

9. Financial and legal risks relating to IM are intertwined. The issues raised by the Stephen Lawrence Independent Review, Operation Herne, the forthcoming Pitchford Inquiry, the reduction in MPS estate and the transition to a significantly reduced organisation budget for the coming decades have crystallized the key areas of risk for the MPS; be they financial, legal, reputational, or operational.

Real Estate and Environmental Implications (if relevant to the subject)

10. Given the volume of material held not just within official OCU local archives (also known as File on Division - FOD) but also within unofficial local archiving held by individuals and teams, the potential for delay to the sale and exit from key MPS buildings is serious. Without uplift in resources, recognition of the BAU churn for IM work and long-term investment in IM as a core pillar of the MPS' mission, the MPS may find itself unable to deliver and embed the One Met Model.

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Background papers:

- Information Management Digital Solution: Initial Viability Assessment - 28/07/2014
- Briefing note - Public Inquiry Team (PIT): Operation FileSafe - Options Paper regarding MPS unregistered archives - 03/02/2015