



Protective Marking	Restricted
Title & Version:	Operation FileSafe Training Requirement V2
Relevant to:	All staff
Summary:	Business case supporting PNA
Author/Pay No:	DI Ellie Pyemont & DI Penny Coombe
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Portfolio Training Board / Training Governance Board

Training Business case for Records Management

ACPO Sponsor: Assistant Commissioner Hewitt

SUMMARY

Following recent public criticism of the way the MPS manages its records, Operation FileSafe was launched. This initiative sought to undertake a comprehensive search of the entire MPS estate in order to locate lost or unregistered files, to refresh Records Management policy and to secure compliance across the organisation. The processes designed by Op FileSafe seek to make every member of staff accountable for the material they generated.

A significant lack of awareness of records management policy was identified, resulting in poor levels of adherence to legislative and procedural requirements. A digital solution to support the required organisational change is in development [REDACTED]. However, a deeper understanding of the necessity for the proper management of information and the processes involved in achieving this need to be embedded within all MPS staff. The recommended training outlined in this paper seeks to improve this.

There is an Information Management Learning Programme hosted on the NCALT managed learning environment. The only mandatory Information Management package is Record-Search-Share, which focuses on learning from the Bichard Inquiry. It does address in detail legislative duties such as MoPI, DPA, CPIA or FOIA.

A. RECOMMENDATIONS - That members agree:

1. Option 2
 - 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



B. SUPPORTING INFORMATION

In 2014 The Stephen Lawrence Independent Review and Operation Herne reports highlighted significant failings in the way that the MPS manages its records. They identified that records which existed could not be found and that material which should never have been retained had been stored for many years without review. The MPS had been failing as an organisation to comply with Information Management legislation and policy.

As a result, MPS Records Management policy was refreshed and Operation FileSafe was launched to generate a comprehensive search of the MPS to locate all documentary records and ensure that all material is recorded and retained in compliance with the refreshed policy. Operation FileSafe seeks to generate organisational change in the way that all officers and staff perceive their responsibilities in relation to records management.

A dip-sample of material stored within local archives across three TP OCUs found that in excess of 20% of all files should have been registered on RMS and stored in the MPS General Registry. In collations generated by CID units, this figure rose to above 50%.

Material held in deep storage was reviewed under Operation FileSafe. 54% of files were found to be missing and over 13% should have been registered in the General Registry.

A significant lack of compliance with Records Management policy was identified across the MPS. It was assessed that this was due to:

- A lack of an appropriate digital solution to support the registration and review of material
- Insufficient training and awareness
- Absence of performance and compliance processes

The details of the key Information Management NCALT packages are as follows:

Code	Date published	Name	Completion data
MPS-CBT022-Improving Police Information IPI	03/06/2011	Record - Search - Share	45751
NCALT_056_02_00	24/10/2012	MoPI Module 2&3: Collection and Recording	3698
NCALT_014_02_00	17/09/2013	Lawful Handling of Information	2350

C PROPOSAL

Option 1: Make no changes to Information Management mandatory training

There are currently a range of Information Management NCALT packages available to MPS officers and staff. Only *Record-Search-Share* is mandatory and relates largely to digital data.

This option relies on communications undertaken under the auspices of Operation FileSafe to increase awareness of the refreshed records management policy and support compliance with policy and legislation. This communication has included articles on the Intranet and in The Job, publication on Policy Pages, SLT briefings and the circulation of briefing slides.

There are no training costs associated with Option 1.



By doing nothing, the MPS will fail to respond to failings identified externally through the Stephen Lawrence Independent Review and Operation Herne reports and internally by Operation FileSafe. Perceived inaction and reticence to fill an identified knowledge gap which has led to a lack of compliance with policy and legislation is highly likely to draw negative political comment and damage public confidence.

A continuation of current practice and an inability to secure needed cultural change will incur further breaches of records management policy and legislation. This will create a risk of legal action being pursued against the MPS, with associated financial consequences. This risk has increased significantly since the publication of externally identified records management failings. The existence of wrongfully recorded and retained information is within the public and political consciousness and will be further reinforced as the announced public inquiry approaches. There are opportunity costs associated with Option 1, however these are challenging to quantify. To provide an estimation, the DLS report that within the past year £X compensation has been paid out by the MPS in otherwise defensible civil claims as a result of key records being lost.

The strategic objective of Operation FileSafe and the refreshed records management policy is to support all officers and staff in becoming as self-servicing as possible in this area of business. If training is not enforced and individuals are not equipped with the knowledge required to achieve this aim, Shared Support Services, Met Prosecutions and Records Management Branch will be responsible for rectifying mistakes and providing an inappropriate level of support. This duplication of effort will incur its own opportunity cost.

Option 2: 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

As stated above, there are several national NCALT packages available to MPS staff pertaining to Information Management. They provide a background to nationally-agreed policy and key information law, outlining individual and corporate legal requirements. Option 2 recommends that 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.

This will significantly increase the current completion rate of both packages and respond to an identified requirement to increase technical skills and awareness of all staff and officers. It is proposed for this to be made mandatory to all MPS personnel given the cross-cutting nature of information law and the significant associated responsibilities.

The mandatory status would be implemented with immediate effect and a requirement made for all staff to complete packages within a 6 month time frame. There would be no change to the way that these packages are accessed, with staff able to access e-learning from any Aware terminal within the MPS. Compliance would be monitored through a review of NCALT completion rates at the conclusion of the 6 month period. OCU Commanders would be informed of completion rates within their command and would be required to ensure compliance.

Impact would be assessed by the dip sampling of adherence to records management policy across business groups by Records Management Branch at 3, 6 and 12 month periods. The benefits, risks and costs associated with Option 2 are detailed below.

There are no design or delivery costs associated with the recommended option. Opportunity costs, calculated using current workforce strength (48734), the charge per hour for FOIA requests in excess of 18 hours (£25) and the length of the two learning packages (1.67 hours) associated with all MPS officers and staff completing the training packages is currently estimated to be:

- **£2,034,644**

D GOVERNANCE

This paper is within the decision making level of the MPS Training Tasking Board. It is sponsored by the Assistant Commissioner for Professionalism, Martin Hewitt.

E OTHER ORGANISATIONAL & COMMUNITY IMPLICATIONS

BENEFITS

The MPS would place enhanced responsibility for Records Management on each officer or member of staff. Refreshed policy requires the individual creating or generating a document to retain, review and share and dispose appropriately. The requirement for each member of staff to undertake Records Management training reflects and reinforces this strategic approach.

The existing e-learning packages providing training on Records Management are designed by the College of Policing. Completion of these packages by all MPS staff will maximise compliance with nationally agreed standards and policy.

By proactively ensuring that all staff undertake comprehensive training pertaining to Records Management and Information Law, the MPS will demonstrate its commitment to providing a robust response to criticisms highlighted by Mark Ellison QC and Operation Herne. This will secure political and public confidence in the organisation's ability to autonomously direct corporate improvement.

RISKS

An opportunity cost of 81 386 staff and officer hours is associated to the recommended option. This equates to £2.03m. In the national context of reduced public spending, this cost may be negatively received by the public and the media. Additionally, as further staff reductions are made, such a cost, albeit in opportunity, may negatively impact staff morale and performance.

Operational commitments may be deferred as officers comply with the training requirement recommended within this report. This may reduce performance and consequently damage public confidence.

EQUALITY AND DIVERSITY IMPLICATIONS

NB: Is there a generic Equality Impact Assessment for E-Learning packages? What reasonable adjustments are in place? Are these managed centrally or locally? (PA)

CONSULTATION

Operation FileSafe Training Consultation Grid

Stakeholder consulted	Outcome Supportive / Supportive with concerns / Non-supportive / Not affected	Comments
Detective Superintendent Neil Hutchison - Op FileSafe project lead	Supportive	This recommendation meets the current training needs of Operation FileSafe but should be reviewed in 6 months or after the launch and embedding of the Information Asset Register, whichever is



		sooner.
BAND B2 [REDACTED] - head of Records Management Branch	Supportive	Op FileSafe has highlighted the need to significantly enhance awareness of policy and legislation around Records Management. The processes recently introduced locally have been communicated and implemented through the support of dedicated RMB staff.
BAND L1 [REDACTED] - Digital Policing	Supportive	Training should focus on records management policy and processes. Supporting digital solutions should be sufficiently intuitive to remove the need for additional training.

LEGAL IMPLICATIONS

There are no direct legal implications arising from the proposal to provide training that supports the knowledge and awareness of MPS staff in relation to records management. E-learning is a tried and tested method of training.

FINANCIAL IMPLICATIONS

Option	Opportunity Cost	Revenue Expenditure	Accuracy Confidence
1	Awaits DLS figures	£0	Low
2	£2.03m	£0	Medium

Report author: DI Penny Coombe and DI Ellie Pyemont

Contact Number: [REDACTED]

Background Papers:

- Operation FileSafe Options Paper
- Operation FileSafe Scoping Paper
- Operation FileSafe Briefing Note to OCU Commanders
- Records Management Refreshed Policy

Appendices to report: None