



Briefing Document:

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TITLE AND VERSION	Briefing note - Public Inquiry Team (PIT): Operation FileSafe - Options Paper regarding MPS unregistered archives - Version 8		
SUMMARY	This briefing document provides background information, analysis and recommendations for action regarding the MPS unregistered archive material		

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Summary:

- The MPS has vast unregistered holdings in local archives within OCUs and deep-storage (some 84,000 crates in deep storage).
- An RMB dip-sample of 2170 of these crates shows a 54% missing / inaccuracy rate.
- The MPS is not currently DPA or MOPI compliant as no fit-for-purpose review or audit process is currently functioning for this unregistered material (be it held locally or in deep-storage).
- This paper requests funding for a 9 month extension of the 60-strong agency team used by SSS to mirror the success achieved in MPS Property and Criminal Exhibit Stores.
- The estimated cost of this is approximately £1 million.
- The key benefits of this course of action are: crucial legal compliance, improved cost-effectiveness of documentary storage, delivery of key Op FileSafe objective.
- The key disadvantage of this course of action is the substantial revenue expenditure of £1 million.

Introduction

The MPS holds 84,000¹ crates of documentary material in deep storage at TNT [REDACTED] which are categorised as unregistered. There are also local archives held by all B/OCUs, of varying size. The full extent of these local archives is not currently known as many MPS teams and units also hold elements of local archives beyond the B/OCU official local archive². Prime London locations are currently used for documentary archives which represent significant non-cashable savings provided in more detail later in this paper.

The TNT material has been sent for storage directly from B/OCUs and is not recorded on the MPS Record Management System (RMS). This material accounts for 62% of the TNT holdings and may be considered as an extension of the MPS local archive³. At present, total deep storage at TNT costs £697k p.a. (ex-VAT)⁴ There is no review process in place for the unregistered material and the MPS is thereby non-compliant with the Data Protection Act (1998) and Management of Police Information (2014⁵). It is being added to on a daily basis as the MPS Estate reduces. Over ten years the cost of that storage is likely to exceed £7m. Similarly, most if not all, B/OCU local archives do not have a review process in fully functioning operation.

By way of comparison and background, the MPS faces graver challenges with regard to document storage, review and retention than it does with storage, review and retention of property and criminal exhibits. This paper explores the benefits and risks of a similar organisational review approach as has been undertaken by Operation Spring Clean led by Shared Support Services. This paper ultimately recommends that a similar methodology and resourcing pattern be adopted by the MPS to tackle the extensive record management challenge of material other than that held within the MPS General Registry.

At present the MPS is not compliant with Management of Police Information (College of Policing, 2014) and the Data Protection Act (1998). The MPS is at risk of receiving substantial penalties and severe adverse judgements from the Information Commissioners for retaining material past its destruction date. Furthermore, inability to locate relevant material in MPS archives generates a risk of the MPS failing to meet its disclosure obligations under the Criminal Procedure and Investigations Act 1996.

Analysis

¹ Briefing Document: Public Inquiry Team - Briefing Note re Records Management (30/06/2014, p.2)

² E.g. Premises search book archives, 124d archives, surveillance log archives etc. (Op FileSafe Working Group minutes)

³ Known widely as 'FOD' (Filed on Division).

⁴ Briefing Document: Public Inquiry Team - Briefing Note re Records Management (30/06/2014, p.1)

⁵ College of Policing (2014): Management of police information [Internet]. <http://www.app.college.police.uk/app-content/information-management/management-of-police-information/> [Accessed 09 January 2015]

As part of Operation FileSafe, Record Management Branch (RMB) undertook a dip-sample review of the Croydon, Westminster and Barnet Borough collations at TNT [REDACTED]. The sample consisted of 2170 files and is judged by Op FileSafe Steering group to be a reliable representation of the wider issue. The findings⁶ of this sample indicate a graver picture than previously anticipated regarding OCU TNT holdings⁷:

- 54% of those items listed were missing;
- Of the above total files, some 13.1% should have been registered crime files held in the General Registry.

Aim

In order to achieve the Op Beacon objective of delivering a coordinated 'sweep' of the entire MPS estate to recover unregistered documents⁸ it has become apparent that given that the local archive and TNT holdings constitute such a large proportion of such MPS material, a sweep or cleanse of that material must be considered part of Operation FileSafe.

Process

The process required to achieve this aim will include the registration of files in line with records management policy and their destruction or relocation where appropriate. Key details of material will be recorded on a corporate system, improving the organisation's ability to search for and retrieve relevant documents. Review and destruction dates will be flagged on a digital solution and prompts made to the document owner accordingly. Once reviewed, appropriate material will be relocated from TNT to deep storage in [REDACTED]. It is anticipated that this relocation would reduce storage costs by 33%. This would be a reduction of £232,000 p.a. At present the cost of storage at TNT will inevitably increase every year as there is no effective process in place to ensure material is destroyed on completion of its retention period.

Furthermore, rationalisation and reduction of locally-held archives will release space within the MPS Estate for other uses or for estate reduction. Work undertaken by Shared Support Services in 2014 indicated significant potential non-cashable savings. The [REDACTED] site has a current real estate value of £270 per m² per year. If this is taken as a nominal base figure, the use of 162m² within Westminster OCU for designated local archiving can be designated as a non-cashable saving of at least £43.7k per year as an

⁶ Email summary report from Ian Leslie (Head of Record Management) to Op FileSafe Working Group (10.12.2014)

⁷ N.B. Duplicate files were also located so the overall percentages given do not equate to 100%.

⁸ Operation FileSafe - Working Group Terms of Reference - version 3.0 (11.09.2014)

⁹ At present the majority of material is held at TNT [REDACTED] which is secure to Impact Level 5, whereas most material stored there by the MPS reaches only IL3 (Restricted).

¹⁰ As per ref. 5, approx 10% of local archives reviewed thus far should have been submitted to the General Registry.

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¹² One seal may refer to one small item, or it may refer to a large bag containing up to a hundred further items.

¹³ The overall capacity of [REDACTED] is 1750 pallets. [REDACTED] provides capacity for 5800 pallets.

¹⁴ Email from [REDACTED] (SSS) to Op FileSafe Working Group leads (06.01.2015)

absolute minimum. Likewise, the 104 m² within Lambeth OCU relates to a yearly non-cashable saving of £28k. This is the case throughout all MPS OCUs.

Strategic Options

In order to review the material held, Operation FileSafe has examined the following strategic options:

Option 1

Consider the requirement to review unregistered material (held in deep-storage or locally) as a matter to be delivered locally without direct Met HQ resource or process support.

In this option OCUs will be expected to allocate existing staff to:

- review their local archives
- record and destroy material which has been held
- send appropriate material to deep storage and to the General Registry¹⁰
- recall and review TNT holdings
- undertake a sweep of their locations
- handle appropriately all material recovered during the local sweep of the OCU under Op FileSafe

Projected costs and timescales for delivery:

- It is estimated that it would take 18,688 officer days to review TNT material alone
- Conservative estimates assess that without the support of agency staff, this work would require an additional 24 months to complete
- Opportunity costs associated with using local staff. These costs would vary according to the areas from which officers and staff are abstracted. The Croydon pilot has found that using staff on restricted duties has been unreliable and ineffective. Lack of skills, training and access to relevant systems has slowed progress. Continuity is lost as officers return to full duties. The ability to plan activity is restricted by uncertain timescales.

Benefits:

- No revenue expenditure at time of financial scarcity.

Risks:

- The opportunity cost to the MPS of this approach is very high.
- There is possible adverse impact on frontline policing capacity connected to this option.
- The MPS will have a reduced likelihood of achieving Op FileSafe objectives due to reduced consistency and continuity of approach across the organisation.

Option 2

Designate a date prior to which all holdings will not be reviewed and focus energy on implementing correct future procedures and operating practices. Undertake no 'back-copy conversion':

In this option OCU's will **not** be expected to:

- review their local archives
- record and destroy material which has been held
- send appropriate material to TNT and to the General Registry¹¹
- recall and review TNT holdings
- handle appropriately all material recovered during the local sweep of the OCU under Op FileSafe

OCU's will be expected to:

- undertake a sweep of their locations.
- handle appropriately all material recovered during the local sweep of the OCU under Op FileSafe.
- ensure future organisational compliance with new Record Management Policy (Jan/Feb 2014).

Projected costs and timescales for delivery:

- It is estimated that it would require 23,258 working days to sweep the MPS estate and register files onto a digital solution.

Benefits:

- The MPS will incur only limited opportunity cost and no revenue expenditure.

Risks:

- The MPS will be likely to be highly criticised at the forthcoming Public Inquiry for failing to adopt a sufficiently radical or robust response to the ingrained Record Management problems highlighted by Mark Ellison QC.
- Highly significant material relevant to key issues of policing and wider national interest may never be recovered.
- The MPS will continue to incur waste and poor value for money for documentary storage.
- The MPS will be unable to release building space for other purposes.
- The MPS will not consider the objectives of Op FileSafe or Op Beacon to have been achieved.

Option 3

Engage dedicated staff to review, realign and re-assert each OCU's documentary archives between Local Archives, ██████████ Registry and TNT deep storage.

Background: Shared Support Services have engaged 50 agency staff as a 'Tiger Team' to reduce the number of exhibits over 12 months old held by OCUs by 30%. In some cases this target has been exceeded, with Wandsworth Borough seeing a reduction of 65%. An additional 10 staff have reviewed the backlog of exhibits held at [REDACTED] and [REDACTED]. In the five months from July 2014, the team succeeded in reducing the volume of seals¹² held centrally by 33,000 - some 304 pallet spaces¹³. They have reduced the volume of property held at [REDACTED] from 97% capacity to 94%.

In this option, OCUs will be expected to:

- undertake a sweep of their locations
- handle appropriately all material recovered during the local sweep of the OCU under Op FileSafe
- ensure future organisational compliance with new Record Management Policy (Jan/Feb 2014).

In this option, OCUs will receive support from a Record Management 'Tiger Team' who will undertake work dependent on the extent of revenue expenditure secured (described below as L1, L2 or L3 support).

Benefits:

- Targeted support for boroughs using tested methodology of Op Spring Clean is more likely to achieve the results seen in Property and Criminal Exhibits Stores (e.g. a reduction of 65% on Wandsworth Property Store, 40% in Kensington Store and a reduction across Lambeth OCU of 29% with several weeks deployment left¹⁴)
- Dedicated short-term agency workers are already appropriately vetted, trained and experienced in review and rationalisation of police material.
- Visible activity at the frontline to support cultural change and positively impact officer morale.
- Reduction in opportunity costs incurred by B/OCUs resultant from the requirements of Operation FileSafe.
- Reduction in impact of Op FileSafe on operational policing and public confidence.
- Reduced likelihood of adverse media coverage of Operation FileSafe.
- Accelerated achievement of strategic objectives.
- Potential to co-locate criminal exhibits and local archives would provide increased supervision and security regarding files once MPS Estate space freed up for alternate uses.

Risks:

- Significant one-off revenue expenditure for engagement of Tiger Team
- Adverse media and public comment regarding the use of agency staff at a time of overall reduction in Police Staff numbers. This may be mitigated by ensuring that Tiger Team positions are

advertised to staff within the redeployment pool prior to engaging agency staff for the remainder of the posts. Police staff were initially sought from the redeployment pool for Operation Spring Clean but applications fell far short of numbers required. There would be a requirement to explore this option again prior to the extension of agency staff contracts.

This projected expenditure has been broken down into three levels according to the intensity of support provided:

Level 1 Tiger Team:

- Review deep-storage material only
- 6 months to complete at an approximate cost of £700K
- This option involves the smallest expenditure but does not resolve the local issues or support practice change at the operational level.

Level 2 Tiger Team:

- Review deep-storage material and locally archived material only
- 9 months to complete whole MPS at an approximate cost of £1 million
- This option involves the mid-level expenditure, achieves the strategic objectives, and due to the deployment to boroughs will support a renewed professional focus and understanding of Record Management within the MPS.

Level 3 Tiger Team:

- Review deep-storage material, locally archived material and also resultant material from Op FileSafe OCU sweeps.
- 12 months to complete whole MPS at an approximate cost of £1.35 million
- The option fully achieves the objectives, however the cost will be prohibitive. This option also devolves responsibility of the problem away from OCUs and individual officers, thereby frustrating the strategic objective of long term organisational change with regard to Record Management within the MPS.

Recommendation: Prolong engagement of Tiger Teams re Record Management

This paper recommends the extended engagement of 60 agency staff currently addressing MPS property and criminal exhibits for a further 9 months at a cost of £750k as described above in 'Option 3' and at 'Level 2'. The majority of staff engaged in the SSS Tiger Team are agency staff. It is forecast that they would be available for reallocation to Op FileSafe from September 2015. In that time they will be deployed in:

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- Review of B/OCU documents stored at TNT to ensure that material is retained in line with records management policy and legislation
 - Registering B/OCU documents stored at TNT onto an Information Asset Register
 - Recording any decision to destroy material, and justification for doing so onto an Information Asset Register
 - Redistributing / returning properly reviewed and registered material to appropriate storage facilities.
 - Undertaking the same process with regard to each OCU's local archive.

Submitted for consideration,

DI Ellie Pyemont & DI Penny Coombe

MPS - UCPI
PROVISIONALLY
REDACTED