HERTFORDSHIRE
CONSTABULARY

Policy Title: PNC Transaction Monitoring Policy
Policy Number: P60071

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Ratified By: Managing Information Board

Ratified Date: 19th December 2005

Version Number: 1.1

1. Policy Administration		
1.1	**Status**	New
1.2	**Owning Department**	OIDD (Information Compliance)
1.3	**Policy Author**	Tree Boleman
1.4	**Date of Review**	April 2009

2. Policy Objective, Statement, Force Procedure	
2.1	**Policy Objective**

To provide clear and concise policy guidance and management commitment, on the PNC Transaction Monitoring process, to Hertfordshire Constabulary staff.

2.2	**Policy Statement**

1. Introduction

1.1 The security of the Police National Computer (PNC) depends upon the ability to retrospectively account for each transaction. PNC Transaction Monitoring is a requirement established by Her Majesty's Inspectorate of Constabulary and the Association of Chief Police Officers.

1.2 The PNC Transaction Monitoring Policy is the master policy for the implementation of more technical PNC Transaction Monitoring Procedures.

2. Monitoring Objectives

2.1 Daily transaction monitoring performs three crucial functions:

- To deter and detect unauthorised access to systems;
- To raise staff awareness of data protection issues, and maintain public confidence; and
- To ensure all relevant transaction fields are completed to provide an adequate audit trail for retrospective investigations into transactions that have been undertaken.

3. Methodology

3.1 Hertfordshire Constabulary will undertake PNC Transaction Monitoring in accordance with the following methodology, in accordance with the ACPO Data Protection Audit Manual.

3.2 The Data Protection Officer has responsibility for the planning and control of transaction monitoring process.

3.3 Where elements of transaction monitoring are delegated to local supervisors, supervisors will report results of monitoring checks to the Data Protection Officer.

3.4 When checking transactions the following areas must be examined:

- Transaction field inputs must be examined for quality;
- There must be sufficient detail to trace the enquiry back to the originator; and
- The legitimacy of the check should be confirmed by questioning the originator and through the examination of references to source documentation.

3.5 The validation of transaction checks must be authorised by a member of staff at a supervisory level.

3.6 Errors found as a result of the monitoring will be categorised and noted. Collation of results will enable recurrent errors, error trends and individuals involved in the errors, to be identified.

3.7 The Data Protection Officer will circulate the findings of the transaction monitoring process through regular audit reports.

3.8 In addition to ACPO Data Protection Audit Manual requirements, the Data Protection Officer will incorporate response feedback into the transaction monitoring process as an educational process to correct persistent errors.

3.9 The Data Protection Officer will refer any transaction not verified for the specified and lawful purpose to Professional Standards Department for appropriate action.

2.3	**Associated Force Procedures**		
PNC Transaction Monitoring Procedure			
3. Related Policy Documents			
3.1	**Associated Policies and procedures**	ACPO Data Protection Audit Manual, PNC Transaction Audit procedures, HMIC PNC Inspection 2004, Pocket notebook entries	
3.2	**Associated Legislation**	The Data Protection Act 1998, Computer Misuse Act 1990	
4. Policy Compliance Audit			
4.1	**Policy Screening Test**	12th August 2005	
4.2	**Equality Impact Assessment**	*Not Applicable*	
4.3	**Organisational Security and Professional Standards Compliant**	**Name:** Vic Kerlin	**Date:** 10.10.05
4.4	**Race Relations Compliant**	**Name:** Julie Foster	**Date:** 28.09.05
4.5	**Health and Safety**	**Name:** Clyde Jacket	**Date:** 11.10.05

	Compliant		
4.6	**Data Protection Compliant**	**Name:** Simon Lane	**Date:** 7.10.05
4.7	**Human Rights Compliant**	**Name:** Anita Janes	**Date:** 26.10.05
4.8	**Freedom of Information Compliant**	**Name:** Tanya Drake	**Date:** 28.09.05
4.9	**Unison**	**Name:** S.Raddings	**Date:** 30.09.05
4.10	**Federation**	**Name:** Vojislav Mihailovic	**Date:** 5.10.05
4.11	**Superintendents Association**	**Name:** Steve Ottaway	**Date:** 3.09.05
5. Publisher Administration			
5.1	**Last Updated**	5th July 2006	
5.2	**Intranet Date**	9th January 2006	