

<b>Procedure</b> PNC Transaction Monitoring Procedure	
	<b>NEW</b>
<b>Purpose of Procedure</b>	The PNC Transaction Monitoring Procedure supports the PNC Transaction Monitoring Policy. The procedure is designed to ensure that PNC transactions are monitored in accordance with ACPO audit methodology as required by HMIC.
<b>Owning Department</b>	OIDD – Information Compliance Office

1. Development in Transaction Monitoring Procedure

The procedure for PNC transaction monitoring may be amended as required, however the standard established in the PNC Transaction Monitoring Policy must be maintained. For example, implementation of an electronic monitoring tool will have a significant impact on the procedure, but will have no impact on the Constabulary Transaction Monitoring Policy.

2. Methodology

- 2.1 Hertfordshire Constabulary will undertake PNC Transaction Monitoring in accordance with the following methodology, in accordance with the ACPO Data Protection Audit Manual.
- 2.2 The Data Protection Officer has responsibility for the planning and control of the transaction monitoring procedure.
- 2.3 The individual who has either, undertaken a transaction for their own use, or requested another to undertake the transaction on their behalf, is responsible for providing evidence to support the integrity of the transaction. This individual is referred to as the Transaction Originator.
- 2.4 The Data Protection Auditor will interrogate OASIS, CIS and any other Force systems that the auditor has access to, to facilitate the validation of transactions. Evidence found on specialist systems, to which the Auditor does not have access, must be provided by the Transaction Originator.
- 2.5 The ACPO Audit Manual states the minimum number of transactions checked on a daily basis should be commensurate with the total number of transactions carried out. The Hertfordshire Constabulary sample size will vary in response to available audit resource with a minimum daily sample of 5 transaction checks each day.

### 3. Initial selection

- 3.1 The sample is selected and recorded by the Data Protection Auditor.
- 3.2 A PNC Transaction Monitoring Form (Form TA1 – Appendix A) is sent to the originator for each transaction within the sample, and recorded.
- 3.3 Transaction Originators have 14 calendar days (14 days) to respond to the Data Protection Auditor.
- 3.4 The Data Protection Auditor will analyse transaction monitoring responses.
- 3.5 Where a satisfactory response is received, the response will be recorded.
- 3.6 Where the Transaction Originator provides a response within the timeframe that does not meet the required standard, the procedure for an unsatisfactory response applies.

### 4. Transaction Monitoring Reminder

- 4.1 A Transaction Monitoring Reminder Form (TA2 - Appendix B), is sent to the Transaction Originator and their Line Manager, when there has been no response to the initial audit within the 14 day time-frame. The reminder allows a further 14 days for the originator to provide a satisfactory response via their line-manager.
- 4.2 The reminder provides an opportunity for the supervisor to identify mitigating circumstances that have prevented a timely response.
- 4.3 Where response to a reminder from the line-manager identifies mitigating circumstances, i.e. the originator is on annual-leave etc., the audit of that transaction will be suspended for a period agreed with the line manager.
- 4.4 Where response to a reminder does not identify mitigating circumstances, the Transaction Originator may be placed on a targeting list to be monitored more frequently.
- 4.5 Where a response is not received to a Transaction Monitoring Reminder a 2<sup>nd</sup> reminder (TA4 – Appendix D) is sent to the Transaction Originators 2<sup>nd</sup> Line Manager detailing when the 1<sup>st</sup> Transaction Monitoring Form and Reminder were sent.
- 4.6 Responses to transaction monitoring reminders are analysed and recorded by the Auditor. Satisfactory responses are recorded. Where a response does not meet the required standard the procedure for unsatisfactory responses applies.

### 5. Unsatisfactory Responses

- 5.1 Having analysed a poor response to either, an initial transaction request, or a transaction audit reminder, the Auditor will complete an Unsatisfactory Response Form (TA3 – Appendix C) which is sent to the line manager of the Transaction Originator. The Unsatisfactory Response form will advise the line-manager of action required to satisfy the requirements of the audit process, the line-manager has 14 days to respond, and mitigating circumstances will be considered.

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- 5.2 Where a response is not received to an Unsatisfactory Transaction Monitoring Form 2<sup>nd</sup> reminder (TA4 – Appendix E) is sent to the Transaction Originators 2<sup>nd</sup> Line Manager detailing when the Unsatisfactory Transaction Monitoring Form was sent.
- 5.3 Responses to the Form TA3 are analysed and recorded by Data Protection Auditor.

6. Referral to Area Command

- 6.1 Where the Transaction Originator fails to respond to the initial request (Form TA1) and the reminder (Form TA2), they may be referred to the Professional Standards Department for appropriate action. The Originator will also be placed on the targeting list.
- 6.2 Where the line-manager of the Transaction Originator fails to respond to an Unsatisfactory Response Form (TA3), they may be referred to the Professional Standards Department for appropriate action. The Originator will also be placed on the targeting list.

7. Referral to Professional Standards

- 7.1 The Auditor will refer suspicion of information misuse to the Professional Standards Department, at any time throughout the process.
- 7.2 The Auditor will provide Professional Standards Department with a list of individuals placed on the targeting list that are consistently failing to satisfy the PNC Transaction Audit requirements.

8. Recording of Errors

- 8.1 The Auditor will record errors relating to the quality of the transaction upon receipt of response to Forms TA1, TA2, TA3 and TA4.
- 8.2 A major error will be recorded when the Auditor, having exhausted the procedures described above, is not able to validate the purpose for the transaction.

DATA PROTECTION - PNC Transaction Audit – Confidential

Please read the attached guidelines before **Printing** the Audit form. **Note all supporting evidence must be attached** and the form must be **Signed** by your Line Manager. Please **do not email the reply**.

This memo must be returned, completed, by internal to **The Information Compliance Office, Headquarters**, or faxed to 4669, **within 14 days from the date it was sent - 05/07/07**.

Force records show that you have carried out/requested the following PNC transaction:

Date: «Transaction\_Date» Time: «Time»
Originator Line: «Originator\_Line\_Text»
Data: «Transaction\_Data»

Originator/Requester of PNC Transaction – please tick one option below:

- I did not carry out/request this PNC transaction (your line manager’s signature is still required) - If you have any knowledge about this check, tell us in the space provided:
I carried out/requested the above PNC transaction for the reason given below e.g. Stop Check (Evidence must be attached):

Signed.....Date.....

Name.....Rank/Position.....

Line Manager (of the above) – please tick one option below:

- I can confirm that the transaction was carried out by the member of staff named above.
I can confirm that the transaction was not carried out by the member of staff named above.

Please also tick one of the following options:

- A copy of the source document/evidence supporting the transaction is attached.
There is no source document/evidence to support this transaction, the reason is given below:

Signed.....Date.....

Warrant

No.....Rank/Position.....

WARNING – This document contains Personal Data which is subject to the DPA (1998)

Transaction Audit Form - TA1 - Audit Reference: «Month»«Number»

DATA PROTECTION - PNC Transaction Audit – Confidential

Please read the attached guidelines before **Printing** the Audit form. **Note all supporting evidence must be attached** and the form must be **Signed** by your line Manager. Please **do not email the reply**.

The following member of staff - «Warrant» «Title» «Name» was sent a Transaction Audit memo on «Date\_Enquiry\_Sent». Unfortunately their response has not been received within the required two week period.

This memo must be returned, completed, by internal mail to **Data Protection at Headquarters**, or faxed to 4669, **within 14 days from the date it was sent - 05/07/07**.

Force records show that member of staff carried out/requested the following PNC transaction:

<b>Date:</b>	«Transaction_Date»	<b>Time:</b>	«Time»
<b>Originator Line:</b>	«Originator_Line_Text»		
<b>Data:</b>	«Transaction_Data»		

**Originator/Requester of PNC Transaction** – please tick one option below:

- I **did not** carry out/request this PNC transaction (your line manager’s signature is still required) - If you have any knowledge about this check, please tell us in the space provided below:
- I **carried** out/requested the above PNC transaction for the reason given below (Evidence must be attached):

Signed.....Date.....

Name.....Rank/Position.....

**Line Manager** (of above) – please tick one option below:

- I can confirm that the transaction **was** carried out by the member of staff named above.
- I can confirm that the transaction **was not** carried out by the member of staff named above.

**Please also tick one of the following options:**

- A copy of the source document/evidence supporting the transaction is attached.
- There is no source document/evidence to support this transaction, the reason is given below:

Signed.....Date.....

**Warrant**

No.....Rank/Position.....

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Please give details of any circumstances that explain why the member of staff was unable to respond to the original PNC Transaction Audit memo within the two week period (e.g. Annual Leave, Secondment). Please note, officers and staff may be subjected to additional target monitoring if unable to provide a reason for not replying to the original audit memo.

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Signed.....Date.....  
Warrant  
No.....Rank/Position.....

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*Transaction Audit Form - Audit Reference: «Month»«Number»*

DATA PROTECTION - PNC Transaction Audit – Confidential
Unsatisfactory Response

Please read the attached guidelines before Printing the Audit form. Note all supporting evidence must be attached and the form must be Signed by your Line Manager. Please do not email the reply.

The following member of staff - «Warrant» «Title» «Name» was sent a Transaction Audit memo on «Date\_Letter\_Sent». Unfortunately their response was deemed unsatisfactory.

This memo must be returned, completed, by internal mail to Data Protection at Headquarters, or faxed to 4669, within 14 days from the date it was sent - 05/07/07.

The response was considered unsatisfactory because:

- No evidence was supplied.

Force records show that member of staff carried out/requested the following PNC transaction:

Date: «Transaction\_Date» Time: «Time»
Originator Line: «Originator\_Line\_Text»
Data: «Transaction\_Data»

Please take the appropriate corrective action to address the above point(s), a suggested course of action is as follows:

The response to the above audit memo states that the transaction was carried out in relation to a XXXXX check. Please provide appropriate evidence for this transaction, e.g. PNB entry, stop form, FPN number, or other suitable evidence.

Or provide details appropriate to this transaction below:

Signed.....Date.....

Warrant
No.....Rank/Position.....

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Transaction Audit Form – TA3 - Audit Reference: «Month»«Number»

DATA PROTECTION - PNC Transaction Audit – Confidential

The following member of staff - «Warrant» «Title» «Name» was sent a Transaction Audit memo on «Date\_Enquiry\_Sent». Unfortunately their response was not received within the required two week period.

«Manager\_Warrant» «Manager\_Title» «Manager\_Name» & «Warrant» «Title» «Name» were sent an audit reminder on «Reminder\_Date». Unfortunately a response has not been received and no reason provided. Please arrange for a response to be provided.

This memo must be returned, completed, by internal mail to Data Protection at Headquarters, or faxed to 4669, within 14 days from the date it was sent - 05/07/07.

Force records show that member of staff carried out/requested the following PNC transaction:

Date: «Transaction\_Date» Time: «Time»
Originator Line: «Originator\_Line\_Text»
Data: «Transaction\_Data»

Originator/Requester of PNC Transaction – please tick one option below:

- I did not carry out/request this PNC transaction (your line manager’s signature is still required) - If you have any knowledge about this check, tell us in the space provided:
I carried out/requested the above PNC transaction for the reason given below e.g. Stop Check (Evidence must be attached):

Signed.....Date.....

Name.....Rank/Position.....

Line Manager (of above) – please tick one option below:

- I can confirm that the transaction was carried out by the member of staff named above.
I can confirm that the transaction was not carried out by the member of staff named above.

Please also tick one of the following options:

- A copy of the source document/evidence supporting the transaction is attached.
There is no source document/evidence to support this transaction, the reason is given below:

Signed.....Date.....

Warrant
No.....Rank/Position.....

Please give details of any circumstances that explain why the member of staff was unable to respond to the original PNC Transaction Audit memo within the two week period (e.g. Annual Leave, Secondment). Please note, officers and staff may be subjected to additional target monitoring if unable to provide a reason for not replying to the original audit memo.

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Transaction Audit Form - Audit Reference: «Month»«Number»



DATA PROTECTION - PNC Transaction Audit – Confidential

«Manager\_Warrant» «Manager\_Title» «Manager\_Name» & «Warrant» «Title» «Name» were sent an unsatisfactory audit request on «Date\_Enquiry\_Sent». Unfortunately a response has not been received and no reason provided. Please arrange for a response to be provided.

This memo must be returned, completed, by internal mail to Data Protection at Headquarters, or faxed to 4669, within 14 days from the date it was sent - 05/07/07.

Force records show that member of staff carried out/requested the following PNC transaction:

Date: «Transaction\_Date» Time: «Time»
Originator Line: «Originator\_Line\_Text»
Data: «Transaction\_Data»

Originator/Requester of PNC Transaction – please tick one option below:

- I did not carry out/request this PNC transaction (your line manager’s signature is still required) - If you have any knowledge about this check, tell us in the space provided:
I carried out/requested the above PNC transaction for the reason given below e.g. Stop Check (Evidence must be attached):

Signed.....Date.....

Name.....Rank/Position.....

Line Manager (of above) – please tick one option below:

- I can confirm that the transaction was carried out by the member of staff named above.
I can confirm that the transaction was not carried out by the member of staff named above.

Please also tick one of the following options:

- A copy of the source document/evidence supporting the transaction is attached.
There is no source document/evidence to support this transaction, the reason is given below:

Signed.....Date.....

Warrant

No.....Rank/Position.....

Please give details of any circumstances that explain why the member of staff was unable to respond to the original PNC Transaction Audit memo within the two week period (e.g. Annual Leave, Secondment). Please note, officers and staff may be subjected to additional target monitoring if unable to provide a reason for not replying to the original audit memo.

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Transaction Audit Form - Audit Reference: «Month»«Number»