University of Portsmouth

To what degree have the non-police public services adopted the National Intelligence Model?
What benefits could the National Intelligence Model deliver?

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The thesis is submitted in partial fulfilment of the requirement for the award of the degree of Professional Doctorate in Criminal Justice of the University of Portsmouth.

May 2012
Abstract

It is claimed that the National Intelligence Model (NIM) consolidated intelligence-led policing principles in investigative practice and decision making in British policing. Subsequently, encouraged by the Home Office, the NIM was adopted by a number of other public services with an investigative capability. However, that transfer took place without a sufficiently rigorous evaluation of the model’s value to the police service and without any meaningful analysis of its relevance to the investigative functions of other public sector agencies. This research examined the adoption of the NIM by three public sector bodies: The Department for Work and Pensions (DWP), The Identity and Passport Service (IPS) and the Driving Standards Agency (DSA). It drew on archival materials, associated literature and the analysis of semi-structured interviews with the personnel of these and associated agencies. Research respondents also assessed a simplified version of the NIM that was designed to remove many of the original model’s inconsistencies and ambiguities.

The research identified that the reviewed public services are not compliant with the NIM minimum standards and that the model has not delivered any meaningful improvement in the consistency of process, investigative efficiency, improved partnership working, or in fraud reduction in those agencies. The NIM failed because of perceived complexity, the language of the model and supplementary guidance; its exclusive ‘fit’ with the police; and a suspicion by the agencies’ personnel that its adoption was intended as a performance management and governance tool. Moreover, the revised version of the NIM’s minimum standards did not improve comprehension or conformity, or resolve the model’s perceived police bias. It was concluded that the model is not fit for purpose for the agencies studied and that an alternative model that is more finely tuned to the needs of those agencies is required.
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Declaration

Whilst registered as a candidate for the above degree, I have not been registered for any other research award. The results and conclusions embodied in this thesis are the work of the named candidate and have not been submitted for any other academic award.
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<td>Assistant Commissioner</td>
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<td>(SOCA) Anti-Corruption Advisory Group</td>
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<td>Accredited Counter Fraud Manager</td>
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<td>ACPOS</td>
<td>Association of Chief Police Officers in Scotland</td>
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<td>ANPR</td>
<td>Automatic Number Plate Recognition</td>
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<td>Borough Command Unit</td>
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<td>Borders and Immigration Agency</td>
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<td>Best Value Performance Indicators</td>
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<td>CA</td>
<td>Content Analysis</td>
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<td>Closed Circuit Television</td>
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<td>‘Computer Statistics’ or ‘Comparative Statistics’</td>
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<td>Greater Manchester Police Authority</td>
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<td>GP</td>
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<td>Government Secure Internet</td>
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<td>Her Majesty’s Prison</td>
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<td>Her Majesty’s Revenue and Customs</td>
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<td>Investigation Manager</td>
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<td>Major Incident Room Standard Administration Procedure</td>
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<td>MOPI</td>
<td>Management of Police Information</td>
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<td>Memorandum of Understanding</td>
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<td>Metropolitan Police Service</td>
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<td>MS</td>
<td>Minimum Standards</td>
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<td>MVSP</td>
<td>Content analysis software tool</td>
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<td>NBM</td>
<td>National Briefing Model</td>
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<td>NCAL</td>
<td>National Centre for Applied Learning Technologies</td>
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<td>National Criminal intelligence Service</td>
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<td>National Committee for the Protection of Equality</td>
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<td>National Crime Faculty</td>
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<td>National Crime Squad</td>
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<td>NIM</td>
<td>National Intelligence Model</td>
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<td>New Public Management</td>
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<td>National Policing Improvement Agency</td>
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<td>Acronym</td>
<td>Description</td>
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<tr>
<td>NPP</td>
<td>National Policing Plan</td>
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<td>NSLEC</td>
<td>National Specialist Law Enforcement Centre</td>
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<td>NYCP</td>
<td>New York City Police</td>
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<tr>
<td>NYPA</td>
<td>North Yorkshire Police Authority</td>
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<tr>
<td>OIU</td>
<td>Operational Intelligence Unit</td>
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<td>ONS</td>
<td>Office for National Statistics</td>
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<td>PACE</td>
<td>Police and Criminal Evidence Act, 1984</td>
</tr>
<tr>
<td>PCSO</td>
<td>Police Community Support Officer</td>
</tr>
<tr>
<td>PinS</td>
<td>Protection in Security</td>
</tr>
<tr>
<td>PITO</td>
<td>Police Information and Technology Organisation</td>
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<tr>
<td>PMCA</td>
<td>Police and Magistrates Court Act 1994</td>
</tr>
<tr>
<td>PNC</td>
<td>Police National Computer</td>
</tr>
<tr>
<td>PNN</td>
<td>Police National Network</td>
</tr>
<tr>
<td>PSDB</td>
<td>Police Scientific Development Branch</td>
</tr>
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<td>PSIP</td>
<td>Public Service Intelligence Process</td>
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<tr>
<td>PSU</td>
<td>Police Standards Unit</td>
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<tr>
<td>PwC</td>
<td>Pricewaterhouse Cooper</td>
</tr>
<tr>
<td>RM</td>
<td>Referral Manager</td>
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<td>RS</td>
<td>Research Subject</td>
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<tr>
<td>QDA</td>
<td>Content analysis software tool</td>
</tr>
<tr>
<td>SCAS</td>
<td>Serious Crime Analysis Section</td>
</tr>
<tr>
<td>SID</td>
<td>Systems for Investigation and Detection</td>
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<td>Senior Investigating Officer</td>
</tr>
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<td>SIMSTAT</td>
<td>content analysis software tool</td>
</tr>
<tr>
<td>SLA</td>
<td>Service Level Agreement</td>
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<td>Senior Management Team</td>
</tr>
<tr>
<td>SOCA</td>
<td>Serious Organised Crime Agency</td>
</tr>
<tr>
<td>SOP</td>
<td>Standard Operating Procedures</td>
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<tr>
<td>SPOC</td>
<td>Single Point of Contact</td>
</tr>
<tr>
<td>ST&amp;CG</td>
<td>Strategic Tasking and Coordination Group</td>
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<tr>
<td>T&amp;CG</td>
<td>Tasking and Coordination Group</td>
</tr>
<tr>
<td>TSU</td>
<td>Territorial Support Unit</td>
</tr>
<tr>
<td>TT&amp;CG</td>
<td>Tactical Tasking and Coordination Group</td>
</tr>
<tr>
<td>UKIS</td>
<td>United Kingdom Immigration Service</td>
</tr>
<tr>
<td>UKPS</td>
<td>United Kingdom Passport Service</td>
</tr>
<tr>
<td>UKTA</td>
<td>United Kingdom Threat Assessment</td>
</tr>
</tbody>
</table>
A brief explanation of terms used within this paper.

Assets
Within the context of the NIM, these include: knowledge, systems, sources and (competent) people to provide the platform and intelligence capability to sustain the NIM business process.

Code of Practice
The ACPO (2005) Code of Practice on the National Intelligence Model, issued in January 2005 by the Home Secretary under the Police Reform Act 2002, provides a statutory basis for the introduction of NIM minimum standards and its basic principles. Chief Officers must have regard to the code and ensure that their forces adopt the practices of NIM and implement the required minimum standards. Her Majesty’s Inspectorate of Constabulary (HMIC) is responsible for inspecting the application of NIM in all police forces and for ensuring that these Minimum standards are met. The NIM minimum standards consist of 11 individual elements, in total there are 135 standards and can be viewed in Annex 1.

Control Strategy
The purpose of the control strategy is to prioritise the work of the Borough Command Unit (police area, such as a borough or division) according to an agreed, manageable range of issues against which resources can be allocated for the forthcoming six months (ACPO/Centrex, 2006: 44). Once the Strategic T&CG has agreed the crime and disorder problems for the control strategy, the group must also agree and recommend the strategic priorities for prevention, intelligence and enforcement within each area.

Information Sharing
According to the NIM Code of Practice (ACPO/Centrex, 2005: 12), the model improves the opportunities to share intelligence across forces and agencies, and between local and national levels of policing. The NIM has not only been adopted by police forces but also by other agencies such as the Serious and Organised Crime Agency (SOCA), United Kingdom Immigration Services (UKIS) and by Crime and Disorder Reduction Partnerships (CDRP). It reduces barriers to effectiveness by producing standardised processes and language and creates a cooperative working environment.
**Intelligence**

In its simplest definition, intelligence is described as “Information designed for action” (Sims, 1993; Taylor and Tidy, 2000). An alternative description of the ‘task of intelligence’ is “.... to provide facts and inference to support first strategy and policy making, second local strategic crime and disorder decisions and third to form the basis of effective tactical and operational activity” (Grieve, 2004: 31). Generally considered to be processed data or information – most commonly the ‘processing’ will be undertaken within a designated intelligence unit, either by a trained ‘intelligence officer’ or ‘analyst’.

**Intelligence Cycle**

The intelligence cycle includes the collection, evaluation, analysis and dissemination/actioning of criminal intelligence at the relevant levels in police and other investigative agencies. (although there are minor variations to the ‘cycle – see Figure 2.1)

**Intelligence-led Investigation**

Intelligence-led investigation has been described as a ‘business model’ and a ‘managerial philosophy’ where data analysis and crime intelligence are pivotal to an objective, decision making framework that facilitates crime reduction (Ratcliffe, 2009: 89).

**Intelligence Priorities (as set by the Strategic Tasking and Co-ordinating Group)**

The intelligence priorities within the control strategy should describe the strategic direction that needs to be taken to enable the intelligence requirement to be fulfilled.

**Intelligence Requirement**

The Intelligence Requirement is a list of facts required, or questions that need answering about a problem. The purpose is to gain more information about crime and disorder problems. The purpose of the intelligence requirement is to direct staff to focus on key areas, but it should not prevent them from collecting information on a wide range of issues (ACPO/Centrex, 2006: 50).
**NIM compliance**
The NIM was given statutory footing by the Police Reform Act 2002 when the government required the police to comply with the published minimum standards of the model; it is against these standards that inspection is undertaken and the ‘level of compliance is determined’ (HMIC, 2008: 7). To be ‘fully compliant’ all standards must be met and adhered to.

**Operational Review**
Commissioned by the Tasking and Co-ordination Group, this may include a Results Analysis to identify ‘lessons learnt’ for retention in the organisational memory.

**Problem Profiles**
Problem profiles are ‘commissioned’ and must be authorised by the TT&CG (ACPO/Centrex, 2006: 70); their purpose is to: identify and understand the scope and context of the problem; enable operational management to make resource decisions; guide investigations and shape plans; highlight prevention, intelligence and enforcement opportunities; provide information for partnership; maintain supervision; assist in subject selection and identification (suspects or victims); ensure legislative requirements are fulfilled; and focus intelligence gathering. Flood (2004: 51) stated that ‘problem profiles’ lead to target profiles and “assets are lined up to enable investigation and disruption of those criminals and criminal groups chiefly responsible for the criminality described in the problem profile”.

**Referral**
Referral is a common expression in non-police public services relating to a suspicious report or activity that triggers ‘referral’ to the security department or investigations unit, e.g. a tendered benefit application or identity document that is irregular.

**Strategic Assessment**
The strategic assessment drives the business of the Strategic Tasking & Co-Ordination Group and gives an accurate overview of the current and long term issues affecting the organisation (ACPO/Centrex, 2005: 64-65). The chief architect of the model described the strategic assessment as it “…enables the strategic tasking and co-ordination to set priorities” (Flood, 2004: 51)
Strategic Tasking and Co-ordination Group (ST&CG)
The ST&CG sets the ‘control strategy’ – the “priorities for intelligence-led enforcement and prevention” (Flood, 2004: 51) and the ‘intelligence requirement’ is required to deliver the strategic priorities for prevention, intelligence and enforcement. The decisions made by the ST&CG provide the context in which the TT&CG works (ACPO/Centrex 2006: 12).

Tactical Assessment
Tactical assessments – drive the business of the TT&CG. The assessment identifies the shorter-term issues in a police force, BCU or region in accordance with the control strategy. The T&CG use the assessment to amend the intelligence requirement where necessary.

Tactical menu
The Tactical Menu comprises four elements: targeting offenders (in accordance with the Control Strategy); the management of hot spots (spatial concentrations of criminality); the investigation of series criminality or incidents; and the application of preventative measures (NCIS, 2000: 14).

Target profiles
The ‘target profiles’ are commissioned by the Tasking and Co-ordinating Groups to secure a greater understanding of either a person (suspect or victim) or group of people, in line with the control strategy priorities or high risk issues.

Tactical Tasking and Co-ordination Group (TT&CG)
The TT&CG is responsible for considering and determining the requirements at a tactical [and operational] level (ACPO/Centrex, 2006: 12), effectively authorising the problems and subject profiles recommended. According to Flood (2004), tactical tasking and co-ordination enables “… problem profiles are commissioned to illuminate opportunities for tactical response” (Flood, ibid: 51). The role of the Tactical Tasking & Co-ordination Group (TT&CG) is to commission and apply the tactical menu to the control strategy; respond to new needs (reactive); and to check that agreed plans are on course (NCIS, 2000: 14).
**Tasking & Co-ordinating**

“At the heart of business management in the NIM is a tasking and co-ordination process ..... operating at both strategic and tactical levels” (Flood, 2004: 48). The tasking and co-ordination process is the means by which considerations, decisions and directions, relating to intelligence products, are communicated to influence the activity of intelligence and investigative personnel. There are two groups, the Strategic Tasking and Co-ordination Group (ST&CG) whose main purpose is to set the control strategy, priorities and commit resources (NCIS, 2000: 13).

**Acknowledgements**

I would like to offer my sincere thanks to my doctoral supervisors, Dr Adrian James and Professor Steve Savage for their guidance and support during this study; and to Dr Phil Clements and his faculty colleagues for their encouragement and assistance during this Professional Doctorate. This study and academic achievement would not have been possible without the support, patience and encouragement of my wife Darrell and three sons Steven, Alan and David.
Chapter 1: Introduction

Foundation of this research
This study reviews the adoption of the National Intelligence Model (NIM) by non-police public services with an investigative capability, to establish their level of compliance with: the model; the associated Code of Practice; and the minimum standards. In addition, from the perspective of operational staff, it endeavours to determine whether the application of the model delivers benefit in promoting a standardised form of intelligence-led investigation; facilitates ‘effective partnership and collaborative working’ (DWP, 2006; IPS, 2007); and its perceived impact on fraud. Critical to this study, and according to the NIM Code of Practice: “The National Intelligence Model is not confined to, or restricted for specialist usage. It is relevant to all areas of law enforcement; crime and its investigation, disorder and community safety.” (Home Office, 2002; para. 3.1.3). As such, the model has been adopted by a number of public service agencies to support and guide the process of their investigation services. Compliance or conformity is determined by adherence to the NIM minimum standards that “sets out the criteria by which the model should be applied” (ACPO, 2005: 101)

The NIM continues to be closely associated with UK police forces as a mandatory ingredient of police management to provide a common system of intelligence-led investigation It is intended to encourage partnership and to support operational policing through intelligence-led decision making (ACPO, 2005; Parliament.uk, 2010). The NIM was designed within the National Criminal Intelligence Service (NCIS) in 1999 and represents a synthesis of a number of intelligence-led initiatives that have been subject to trial and development within police services from the 1970s, and ‘due regard to the code’ and adoption of NIM practices is now a compulsory for the police within the United Kingdom (Ratcliffe, 2008). The origins and development of intelligence-led policing (ILP) and the NIM are reviewed in Chapter 2 of this study. However, ILP has not been the only development, in recent years and there has been a growing consensus that the police systems of the Western industrial societies have experienced profound change (Jones and Newburn, 2009: 733), particularly in crime control and investigation. In the UK this was further stimulated by the Baumber Report (ACPO, 1975), which proposed the employment of intelligence to direct policing; the introduction of analysis; and mandatory operational briefings (John & Maguire, 2007: 200). Nor have these changes exclusively focused upon
intelligence-led investigation (Ratcliffe, 2008) and include organisational management (Chatterton et al, 1996; Johnston, 1996) and the impact of new technology (Marx, 1988). However, the compulsory imposition of the NIM and its Code of Practice on the police, having been subject to legislation, codified - under section 39A of the Police Act 1996, as inserted by Section 2 of the Police Reform Act 2002, required compliance that is subject to audit and inspection. The legislation states that “Chief officers must have regard to the code and ensure that their forces adopt the practices of NIM and implement the required minimum standards” (ACPO, 2005: 8). Specific only to police services, the legislative requirements do not extend to non-police public services and their compliance will rely upon voluntary adherence to the model and the minimum standards.

This study has not focused on police compliance to the minimum standards, nor on the impact or efficacy that the NIM may have delivered to their tasking and investigation processes and procedures. Rather, it examines the creation and development of the NIM, as public policy; the possibility of policy transfer influencing its evolved profile (from the Kent Policing Model); and its adoption and implementation into the broader investigative community (Hill, 2009). With regards to policy, examined in detail in Chapter 4, the research intends to examine the level of conformity by non-police agencies and whether the current level of adherence to the NIM will provide an appropriate and robust model to deliver a nationally consistent intelligence-led investigative process and practice.

Setting the scene

This study examines the National Intelligence Model (NIM) to establish whether, as a business model, or ‘business process in action’ (NPIA, 2009), it is accessible and appropriate to non-police public services, with an investigative capability. In the public service context, it seeks to identify whether the NIM encourages intelligence-led investigation; facilitates improved partnership and collaborative working; and supports reduction in fraud. The foundation of this enquiry is based upon earlier research (Osborn, 2008), consultancy and literature review, and examines the model’s relevance to organisations beyond the police, initially identifying and reviewing areas of non-compliance to the NIM processes and asset requirements as outlined in the guidance and minimum standards (ACPO/Centrex, 2005). In response to this review and consultation, it proposes that revised, simplified and complementary processes of intelligence-led investigation are considered for adoption by non-police public services.
The research has employed interview responses of public service criminal investigation and intelligence staff and reviewed the investigation and tasking processes of three different centralised non-police public services. In descending order of staff size and budget the public services under review were the Department for Work and Pensions (DWP); the Identity & Passport Service (IPS); and the Driving Standards Agency (DSA). It has also included a limited number of interviews and process reviews with investigative staff of the Driving Vehicle Licence Authority (DVLA) and the Criminal Records Bureau (CRB). The full rationale for this selection, together with their departmental profiles is provided in Chapter 3. In addition, personnel from both the Metropolitan Police Service (MPS) and the Serious Organised Crime Agency (SOCA) were consulted to gauge the ‘police perspective’ and to provide a comparison between a police and non-police agency (SOCA) that shared a common business purpose.

Since 2001, on retiring from the Metropolitan Police, I have been professionally engaged with the police, SOCA and other public services, predominantly as a consultant and trainer. Through exposure and professional collaboration with managers, investigators and intelligence staff in public service, a number of revised and generally improvised versions of the NIM have been identified. Public service organisational investigative systems have similarities with the published version of the NIM, but it was evident that a consolidated and common intelligence-led investigation process between the police and agency investigators does not exist. This experience has provided me with valuable insight and some appreciation of the apparent struggle public service investigation managers and staff continue to experience in reconciling the demands of the model with their own organisational structures and procedures. It was the evident anomalies of investigative practice, tasking and co-ordinating between these agencies that stimulated this research.

*Problem Statement*

This research establishes the suitability of the NIM as a process, for non-police public service investigation. The reasons have been identified and an alternative revised, simplified and complementary principles of intelligence-led investigation process and guidance have been proposed for consideration.

Earlier research (Osborn, 2008) and consultancy experience within UK public service over the last decade (see Appendix 2) have identified an apparent will, and business imperative,
to forge meaningful partnerships with the police and the broader investigative community. The potential benefits of intelligence sharing and complementary investigative practices was, and continues to be, acknowledged by senior managers within public services, supporting cost reduction and improved investigative products and governance. By 2006, a substantial number of agencies, regulators and Non-Government Organisations had embraced and ‘signed up’ to the NIM with an expressed enthusiasm and expectation that it would reduce the fraud risk, and deliver benefits to investigative processes and products.

However, a limited review (Osborn, ibid) of tasking and coordination as an indicator of NIM conformity within the DWP. IPS, the security services; and the DSA, identified a low level of conformity to the key requirements of NIM. This research indicated a number of potential causes contributing towards non-compliance that included limited investment in the required (NIM) assets to support the model; expressed suspicion that the model was a thinly disguised ‘performance tool’ with limited and selective adoption of process. These contributors were exacerbated by a limited understanding of the model and the compliance criteria by investigators and managers. It was evident that, to the public service investigator, the NIM appeared to be relatively complex and that, with each new publication of supplementary guidance, it became more sophisticated, elusive and biased towards police application. It was suggested by an Investigation Manager (RS22) that the terminology is exclusive and that outside of the police, direct parallels and interpretation of the terms require a creative flexibility; particularly when attempting to reconcile extant organisational policy, investigative protocols, systems and procedures with the requirements of the model. In recognition of these concerns there have been some published attempts to simplify aspects of the model for police to reduce the bureaucracy demanded for strict compliance (Morgan-Jones, 2009: 12-15).

It was evident from early interviews that the NIM was popular with some senior managers within ACPO, the police (NCIS, 2000b), the Home Office and a number of senior managers within public services. This appeared to be based on the belief that the NIM, as a refined ILP rational model, would prove effective in improving investigation, collaborative working and performance. However this popularity was not universally shared throughout the public service. This research will endeavour to establish whether the adoption of the NIM has provided benefit to non-police agencies, although the effectiveness of the model remains difficult to measure (Maguire, 2004: 5). Ratcliffe (2008: 273) closely associates the NIM with intelligence-led policing, arguing that: “In the
UK, it is almost impossible to discuss the concept of intelligence-led policing without making reference to the National Intelligence Model (NIM)”. Acknowledging this close association between the NIM and ILP, at the outset of the NIM development Reiner (2000: 123) argued that the success or otherwise of ILP strategies was ‘hard to measure’ as “a crucial difficulty in evaluating policing innovations is the absence of reliable and valid measures of police performance.” This is supported by Tilley (2008: 147) who acknowledges that ILP enjoys a ‘high level of surface plausibility’, but qualifies this by suggesting that hard statistical evidence of the overall benefits with regard to routine offending is hard to find.

In the absence of standardisation and where variations of the model, even between police authorities subject to external inspection, are evident, meaningful performance measures and comparative analysis can be frustrated (Vass & Simmonds, 2001). The apparent complexity of process (examined in Chapter 4 and 5) and the evident inconsistency in the NIM implementation (resulting in numerous versions within the UK police and public services) potentially exacerbates accurate measure. Exclusively referring to the police, Burgess, et al (2002: 17) commented “the evaluation of the impact of performance monitoring schemes, the level of complexity of policy activity makes it a particular issue in this context. Such complexities also suggest that a simple set of performance measures will not be sufficient”. In this respect, statistical evidence as a product of reliable quantitative comparative analysis may prove elusive and the research may have to rely upon the testimony of operational personnel and managers to provide a measure of ‘benefit’ derived from adoption of the NIM by public services.

Rationale
This Professional Doctorate has encouraged personal reflection on my professional experience; feedback in consultancy; and continuing work with public services. This exposure, together with primary research undertaken over the last decade, has indicated that key elements and activities of the NIM are often resisted or ‘adapted’ to accommodate the core services of the hosting organisation including the prevailing investigative protocols and procedures, e.g. identity and issuing passports, or the paying of benefits (DWP, 2010a: 2010b). This non-compliance and apparent operational resistance has stimulated and informed this study. Within the police and public service management, there remains a broad acknowledgement that the NIM potentially offers the opportunity
and promise of a more unified, standardised and collaborative response to ‘crime control’ (Parliament.uk, 2010). However, this perspective is not apparently shared by all public investigators, as the investigation of ‘crime’ is almost exclusively dominated by fraud and not ‘volume crime’, community safety, public order, nor the diversity of criminal activities dealt with by the police. As such, this research reviewed whether the NIM and the criteria outlined in the minimum standards, supported or confounded agency compliance and their suitability for investigators and security managers within public services outside of mainstream policing.

**Aims and objectives**

The aim and objectives of this research is provided at Appendix 1, and are shown in summary below.

1. Assess the relevance and accessibility of the NIM, as a business model to non-police public services.
2. Establish the level of compliance with the NIM, Code of Practice and minimum standards by public service investigative teams.
3. Identify the specific areas of non-compliance and assess its impact on intelligence-led investigation, decision making and partnership.
4. Identify and evaluate the causes for non-compliance with regards to the model’s asset requirements, process and procedural change and cultural resistance.
5. Assess whether a revised edition of the NIM minimum standards will improve the comprehension and understanding of the public service investigation teams.
6. Propose any potential remedies to non-compliance with the NIM.

**Structure**

The following chapter (2) introduces the origins and development of intelligence-led policing and the NIM. Chapter 3 provides an explanation of the research design; the ethical issues in carrying out this research; and the challenges encountered. Chapter 4 summarises the literature review, including relevant earlier research, to provide the intelligence origins of the NIM; and its validity as a business model; whilst Chapter 5 provides a summary of the findings of the primary research concluding with a summary and interpretation of the results and relevance to this study. Chapter 6 draws upon the findings and examines the conflicting perspectives - proposing a revised and simplified
model and guidance that may reconcile the different core businesses and investigative processes of public services. The concluding chapter (7) provides a concise summary and review of this study identifying difficulties and compliance problems associated with the NIM experienced by public services.

Summary
This research describes the public service implementation of the NIM; specifically from the perspective of the non-police agency operational ‘users’. It reviews aspects of conformity with the model and the minimum standards to establish whether, adopted in its current form, there is any real, or perceived, benefit to the reduction of fraud, either through improved intelligence led investigation, decision making or productive partnership.
Chapter 2: Origins, foundation and development of the NIM

Introduction

The NIM, launched in 1999, was commissioned by ACPO (Christopher, 2003: 154) and was formulated within NCIS. It was co-authored by Messrs Flood and Gaspar, primarily inspired by ILP, and developed from the Kent Policing Model (KPM). The NIM resulted from an ‘accelerating push’ to professionalise police practice which was, in Kent Police, championed by their Chief Officer David Phillips and then promoted, firstly by ACPO to the Home Office and then as a central government ‘law and order agenda’. As a precursor to the introduction of the NIM, the 1990s witnessed police forces adopting and progressing proactive methods of crime management in response to the National Audit Commission’s (1993) report ‘Helping with Enquiries – Tackling Crime Effectively’. This resulted in increased intelligence application by police including the creation of the Directorate of Intelligence (SO11) within the MPS (John Grieve Centre, 2010) together with the launch of the Systems for Investigation and Detection (SID) project in 1991 (Grieve, 2004: 33). This broadly synchronised with intelligence-led policing (ILP) experiments in Kent (John & Maguire, 2007: 210) resulting in the introduction of the KPM in 1993. A number of notable commentators suggest that the full arrival of ILP coincided with the establishment of the NIM (Savage, 2007; Rowe, 2008) and this is supported by Ratcliffe (2008, 4) who argues that “the concept of ILP is enshrined in legislation that demanded all forces adopt the NIM in 2004”. This proposes that the NIM is a direct evolutionary product and conceptual reflection of ILP, albeit for non-police public service consumption, this is more commonly referred to as ‘intelligence-led investigation’.

Predominantly the model and minimum standards reinforce key areas of policing activity and business as illustrated by the inclusion of ‘core business areas’ of policing such as ‘disorder’ and ‘community problems’ (ACPO, 2005: 103). These terms, together with allied police terminology and complexity “at some levels of the model” (Flood, 2004: 51) within the ‘Guidance’, indicate that the model, as originally conceived, was not designed or intended for adoption by non-police agencies. The NIM ‘Guidance’ provides no qualification or exemption for public services, stating that it is necessary to apply the criteria within the minimum standards (ACPO, 2005, 2.2.1: 101) including the acquisition of key assets and implementation of the processes to support intelligence-led investigation and decision making. Arguably, selective adoption, available to non-police agencies, may
deliver some benefits, however failure or inability to meet the ‘minimum standard’ criteria will frustrate standardisation and, potentially, decrease the advantages of intelligence-led investigation implicit in the model. I would therefore argue that cosmetic or superficial adoption will confound the aspiration for: national standardisation; improved investigation and decision making; and commonality of process, necessary to facilitate collaborative working and partnership.

This chapter will review the NIM as a developed intelligence-led business model and a reincarnate and modified version of the Kent Policing Model, representing an evolved product of ILP; designed by NCIS, sponsored by ACPO; and adopted by the Home Office for national implementation. To preserve chronology, I will initially review the origins of ILP within the UK. An additional inclusion is a brief description of the Intelligence Cycle (Baumber Report: ACPO, 1975) as it provides a common thread through the three interrelated processes expounded by intelligence-led policing, the KPM and the NIM. Having established a foundation of ILP as a process, this will be followed with an examination of the stimulus and development of the KPM. This is followed by a contextual review of its progeny - the NIM including a description of ‘compliance’ for the police and ‘conformity’ from the public service perspective. This is supplemented with a brief review of the core decision making ingredient of the model ‘tasking and co-ordinating’; and the ‘intelligence strategy’ that was included within the KPM. The final element of this chapter provides a review of the NIM as a potential tool of partnership.

**Intelligence-led policing (ILP)**

The concept of gathering and exploiting intelligence as an aid to investigation is not new and will be explored in more detail in Chapter 4. Even within the police, early detectives and investigators were aware of the value of intelligence, often derived from crime logs and informants, but it was the slim ranks of the early CID who maintained an almost exclusive preserve of ‘intelligence application’ described by Maguire (2003: 365) as “possessing the monopoly of expertise” in this arena. However, this elite group did not practice any systematic recording or processes in the collection and application of intelligence (PRO MEPO 2/4967, 1936; cited in James, 2011: 45). Although since the 1920s a card index system of ‘local thieves’ had been maintained in (MPS) CID offices (Grieve, 2004: 27). The process of intelligence development, synthesis and inference were generally not institutionally employed in mainstream (and uniform) policing. Intelligence-
led policing was a devised paradigm of the 1970s that appeared to strike popular resonance with police managers and, over time and through refinement, delivered operational benefits (Ratcliffe, 2008). John & Maguire (2007: 200) suggested that the Baumber Report (ACPO, 1975) initiated the concept (now familiar in modern policing) that intelligence gathering and analysis should be employed to generate a fuller picture of crime and disorder and it was necessary to brief officers with relevant information. It is appropriate therefore that this research commences with ILP credited to the Baumber review and report.

Before the Baumber Report (ACPO 1975), the expression of ‘criminal intelligence’ lacked a documented common vision, strategic aim or working definition within the UK police community. (Ratcliffe, 2008). That is not to suggest complete institutional torpor as in the 1960s the MPS C5(2) Intelligence Section developed its own surveillance unit and with the London and Provincial Liaison Section (C9) evolved into C11 (Grieve, 2004: 28) – focusing on the collection and development of criminal intelligence. However, on commencing his inquiry, Baumber’s first self-imposed task, was to consider whether the police needed an intelligence system at all (James 2010: 98). My experience of police training in the 1970s, supported this consideration as it was relatively devoid of any reference to intelligence gathering or application, being dominated by the recognition of offences and the reporting of crime with only limited guidance being provided for investigation. Flood (2004) argues that preceding Baumber’s Report (ibid) most forces were preoccupied with investigating reported crime “intelligence activity in most police forces had exclusively short term operational objectives. Moreover, the absence of any means to formalise intelligence requirements meant that a premium was often attached to the volume … rather than its quality or relevance … there existed no coherent doctrine of intelligence” (Flood, 2004: 40).

In an attempt to remedy what he referred to as “a haphazard and controversial subject”, Baumber recommended minimum standards for the collection and management of intelligence (ACPO, 1975: 26). The Report also recommended more systematic application of criminal intelligence for all of the police service and a clear differentiation was made between ‘information’ and useable ‘intelligence’. Baumber proposed that the interpretations of criminal intelligence be consolidated and revised to include data evaluation, analysis, contextualisation and association to provide optimum value
(Sheptycki, 2004), although providing no differentiation between ‘modes of intelligence’, i.e. crime, criminal, community and contextual. He further proposed a process for the development of intelligence in the ‘intelligence cycle’ (see Figure 2.1) and should be credited with being the first senior police manager to substantially expand the definition and application of information and intelligence. Despite its 35 year provenance, Baumber continues to be regularly cited (John & Maguire, 2007; Keane & Kleiven, 2009) as the stimulator of ILP and to provide a definition of criminal intelligence: “criminal intelligence can be said to be the end product of a process often complex, sometimes physical, and always intellectual, derived from information that has been collated, analysed and evaluated in order to prevent crime or secure the apprehension of offenders” (ACPO, 1975, para.32).

Post-Baumber and the Intelligence Cycle

Baumber’s recommendations, although providing the foundation for contemporary ILP, resulted in very limited progress even though Sir Robert Mark had claimed to be the first Chief Officer to implement ILP strategies (within the Metropolitan Police). However, he argued that his response was a reaction to the paucity of resources to perpetuate traditional policing methods: “the refusal of successive governments to allow police adequate resources to fulfil their primary function of prevention” (Mark, 1978: 293). Even this implementation was limited, resulting in “a comparatively small number of handpicked men and women to specialise in intelligence gathering and surveillance” (Mark, 1978: 294). If this was the case and the 1970s witnessed the formal introduction of ILP, its development and application was not immediately adopted throughout the UK; appearing to have been initially interpreted as an informed tool to improve ‘directed patrolling’ (Home Office, 1988). Few of Baumber’s recommendations, or those from the subsequent Pearce Report (ACPO, 1978), on Criminal Intelligence Offices, had been acknowledged or implemented (Grieve, 2004) and this was confirmed when over a decade later, in 1986, ACPO commissioned a further study to be undertaken by Ratcliffe, then Assistant Chief Constable of Cambridgeshire (ACPO, 1986).

According to Ratcliffe (ibid), designated staff appeared under-trained and the few Intelligence Units that existed appeared ill-equipped and without clear focus and purpose. He reported and emphasised the need to co-ordinate intelligence gathering and the improved application of intelligence products to, direct operational activity and guide
resource allocation, thus stimulating ILP. However, Grieve (2004) argued that Ratcliffe was no more successful than Baumber in effecting meaningful change and significant impetus to ILP throughout the police. Following Ratcliffe, several authors and authorities have sought to progress the concept of ‘intelligence first’ and to provide a single nationally adopted systems (Maguire and Norris, 1992) and probably the most celebrated of these was the Kent Police Model (KPM) which commenced in 1993 (Flood, 2004; Phillips, 2008) and is reviewed on page 14.

Baumber’s introduction of the concept of the Intelligence Cycle (see Figure 2.1 below) provided a framework for ILP (ACPO 2008: 11), but the description in this ‘Guide to Intelligence-led Policing’ remains slightly controversial. IntelligenceAnalysis.net (2010) disputes the terms ‘direction’, ‘collation’ and ‘evaluation’ and, proposed an alternative cyclical process, arguing that collection, grading, analysis, evaluation, dissemination, direction and back to collection, more accurately reflects an analyst’s perspective. Therefore, the latest ‘version’ of the Intelligence Cycle is not without its critics and continues to court some controversy, but it is a reasonably sound and simple process. Its profile is familiar to trained public service investigators and managers, e.g. Accredited Counter Fraud Specialists and Managers (ACFS/ACFM), as it is a core part of their training. It has relevance within this introduction as an illustrative mechanism to support the intelligence-led investigation process and will be referred to again, and exploited, as a familiar intelligence tool in Chapter 5.
In its evolving guise, ILP has been described as a ‘business model’ and a ‘managerial philosophy’ where data analysis and crime intelligence were pivotal to an objective, decision making framework that facilitates crime reduction (Ratcliffe, 2009: 89). For clarity and general appeal (not being specific to policing), deLint (2006: 1) offers an alternative definition suggesting that intelligence-led investigation as “strategic, future
oriented and targeted approach to crime control, focusing upon the identification, analysis and management of persisting and developing problems or risks”. It appears clear that when first proposed, ILP was an ‘operational tactic’ (Ratcliffe, 2008: 6), intended to reduce crime through proactive policing - targeted by criminal intelligence. ‘Proactivity’ was defined by HMIC (1997) as “targeting of specific criminally-active individuals and monitoring of activities to obtain evidence for successful prosecution, strategic initiatives against particular categories of crime, crime prevention categories and initiatives”. Innovative in comparison with traditional reactive policing methods, the intention was to expand the collection, analysis and use of intelligence to tackle routine volume crime. However as described, its adoption and evolution into a practical and working national practice and model employed by all police officers and investigative staff, remained slow (Grieve, 2004) and Flood (2004: 40) concurred by stating that “neither of the reports, however, led to a dramatic improvement in either intelligence processes or capacity”. It was also apparent that, initially police managers remained sceptical and resistant to departing from traditional methods (Reiner, 2000), potentially questioning whether ‘ILP works’ (Ratcliffe, 2008). This resistance may have been more cultural than intellectual (Lingamneni, 1979; Manning, 1992 and 1997; Hart, 1996; Chan, 1997) and will be reviewed further in Chapter 4. However, managerial confidence in ILP may have remained equivocal because, as Reiner (2000:123) has commented, their remained difficulties associated with accurately measuring the ‘success’ of ILP. However, in the 1990s the popular press, broadcasters and politicians were regularly adversely commenting on the apparent inability of police to use intelligence effectively; identifying disappointing international comparison; and highlighting commissioned studies revealing inadequacies in police intelligence systems (Gill, 2000; Cope, 2003, 2004 and 2008; Innes, Field & Cope, 2003, and 2005; Skeptycki, 2004; and Phillips, 2008). This increased pressure and publicity together with an ‘explasion in criminality’ (Ratcliffe, 2008: 2) potentially, provided impetus to adopt overt ILP practices.

The development of the Kent Police Model (KPM)

Regardless of motive or mode, towards the end of the millennium the police and political climate appeared set for ‘Zeitgeist Singularity’ and the embryo, if not the heart and soul, of the NIM was spawned in the Kent Policing Model (KPM) described as “an information-led proactive problem solving approach to policing with crime reduction as its primary objective” (HMIC, 1995: 1). David Phillips, the Chief Constable of Kent Police, ably
assisted by Brian Flood, introduced the KPM in 1993 as a deviation to traditional policing methods and to employ a “holistic system of intelligence-led policing” (ILP: Maguire, 2008: 455). Phillips stated that the collection and analysis of information on offenders and their associates could inform target enforcement that would prevent criminal behaviour through disruption (Tilley, 2008: 147). The KPM has been described as the “most extensive and influential proactive intelligence-led policing initiative demonstrated across the mainland UK” (Tilley, 2008: 113). However, its success requires some qualification, not least that the Kent model did not incorporate a strategic element, and the model, almost exclusively, focused upon four crime elements: robbery, autocrime, burglary and drugs (interview with ACPO member cited in James, 2011: 124). In addition, Amey et al (1996: 33) proposed that the model could not affect general levels of crime. However, even with these limitations, the localised implementation of the KPM was ambitious as Flood believed that previously attempted transitions towards ILP had failed due to a combination of cultural resistance to change and scarce tactical resources - necessary to respond to the intelligent products (James, 2011: 113-114).

The KPM demanded a “significant level of structural reorganisation to produce integrated systems” (Maguire & John, 1995 cited in Maguire, 2008). Phillips and Flood maintained constant pressure to achieve adoption of the KPM, manifesting an almost messianic commitment to orchestrate ‘submission’, conversion to, and implementation of the model. Initially, the police intelligence systems were not configured to support intelligence sharing, nor to supporting problem solving activities (Flood, Felton and McCann, 1998: 1-2) requiring organisational and procedural change to ensure sustained commitment to the employment intelligence as a “genuine and necessary discipline for policing” (Phillips, 2006: 4). Nevertheless, the KPM was piloted for a 12 month period in Thanet (population circa 120,000) in 1993 and, following implementation, recorded reductions (Amey et al, 1996) in the four key areas of reported crime (auto crime, burglary, drugs and robbery).

Subsequent independent research (Amey et al, 1996) tended to prove inconclusive as to the precise contributory factors impacting on the decrease in recorded crime, although ‘victim satisfaction’ had increased and police staff appeared to welcome the changes. Flood also conducted his own research (cited in James, 2011: 121), broadening his population as the model expanded across the force. The general results continued to be positive; in that the management information and performance indicators demonstrated that some recorded
crime levels were decreasing, albeit inconsistently across the county. Flood’s (internal and unpublished) research revealed that the critical success factors were difficult to identify, particularly as the BCUs employed their own interpretation of the model (HMIC, 1995: 5) and varied tactics in response to crime reduction and prevention. Nevertheless, Phillips became convinced that the KPM, effectively blending intelligence-led’ and problem-orientated policing, could be developed as a national policing model (Phillips, 2008) and he was supported in this by Her Majesty’s Inspectorate of Constabularies suggesting that the model “has a significance which extends well beyond Kent to the police service nationally” (HMIC, 1995: 7). Encouraged by the results from Kent; endorsement by HMIC; and the subsequent adoption by ACPO, in 1998, NCIS offered Brian Flood a position in its Corporate Development Unit. It was there, working with the Deputy Director General of NCIS, Roger Gaspar, that the KPM was re-engineered and re-branded for general release as the National Intelligence Model; resulting in the ‘Blue Book’, an introduction and effective ‘manual of guidance’ to the NIM, circulated to all forces in England and Wales in 1999.

NIM

The National Intelligence Model (NIM)

The NIM, as a Home Office endorsed model, was first piloted in England and Wales in 2000. Its purpose was to produce an ideal intelligence model: “for the whole business of policing that would enable police commanders to understand and anticipate risks and threats across the public safety domain” (Flood and Gaspar, 2009: 54). As a direct result of this ‘piloted introduction’ and trial, in November 2002, the NIM was included in the first National Policing Plan (NPP) for 2003-2006 by the Home Secretary, David Blunkett. The NPP incompletely described the NIM as “underpinning intelligence-led policing at force, cross boundary and national levels” (Home Office, 2002: para. 3.21); effectively omitting Level 1. The NPP continued by stating that the model had “demonstrated ability to improve collection, analysis and the management of police intelligence and the management of police deployment” (Home Office, 2002: para. 3.21), and requiring all 43 police authorities to adopt the practices of the model and have “regard for the code” by April 2004 (Home Office, 2002; ACPO, 2005: 8).

The NIM was “a direct descendant of intelligence-led policing...” and its purpose was “to promote standardised intelligence-led proactivity” (Flood, 2004: 41). In addition through
broad adoption it was intended to: facilitate compatibility between different organisations engaged in criminal investigation; provide clarity of responsibilities (for chief officers and police authorities); and “to ensure observance of the principles, standards of implementation, results in a systematic programme of continuous development, practice and capability” (ACPO; Centrex, 2005: 100). The substantial document, ‘Guidance on the National Intelligence Model’ (ACPO, 2005) provides a rationale and a lengthy description of the NIM; the compliance requirements are described in the Code of Practice that provided the minimum standards. Both the Code of Practice and the ‘Guidance’ were granted statutory recognition and required compulsory adoption of NIM practices by the police, codified - under section 39A of the Police Act 1996, as inserted by Section 2 of the Police Reform Act 2002 (Section 1.2 of the Code of Practice, p. 2).

The NIM is an ILP model, an augmentation and development of the KPM (supplementing a ‘strategic element’ and broadening its impact on general crime and policing) designed by police; and developed by NCIS. The model incorporates elements of earlier police initiatives such as ‘problem oriented policing’ (Goldstein, 1990); ‘community policing’ (Kelling & Wilson, 1982) ‘crime reduction and neighbourhood policing’; and aspects of COMPSTAT including and ‘Quality of Life Policing’ (Bratton, 1998; Griffiths, 1997; Hyunseok et al, 2010). ‘COMPSTAT’ relates to an alternative intelligence model, incorporating a strategic assessment, initially employed by the New York City Police and is explained in detail in Chapter 4. The presentation of the original (NCIS) model may defy simple description and during research, the significant majority of respondents had difficulty in articulating the model’s profile, its core processes or the requirements of its minimum standards. It is argued that the perceived complexity of the model as presented within the “Guidance” (ACPO; Centrex, 2005) is a potential weakness (as Newburn et al, 2007: 210 have noted), its purpose was to support, and potentially replace, a variety of intelligence-led investigation processes to a broader audience, thus providing a framework to standardise investigative practice. The simplest graphical representation of the NIM, and the illustration that introduced the model shown below (see Figure 2.2), is supported by this explanation: “… a diagrammatic representation of the NIM business process. This process map graphically illustrates the NIM relationship with the intelligence cycle. The ACPO NIM minimum standards have been built using this process map to provide structure and focus upon key elements of the model. The model’s strength is in its simplicity ...” (ACPO, 2004: 4).
The NIM has been variously described as a “business management model” (Christopher, 2003); an “intelligence-led business model” (Grampian Police, 2010); an “intelligence-led policing model” (Scottish Police College; SPSA, 2010); and a “business process in action” (National Police Improvement Agency; NPIA, 2009). According to the NPIA (2009), the model takes an intelligence-led, problem solving approach to crime and disorder. The NIM has also been portrayed as ‘the major vehicle through which intelligence-led policing is being delivered in the UK’ (Tilley, 2008: 147); a ‘national intelligence-led investigation model’ (Innes, Fielding & Cope, 2005: 39) and, according to ACPO, “the core business model for policing...” (ACPO, 2005: 9). Furthermore, guidance on the NIM (ACPO, 2005: 12) states that “NIM promotes a co-operative approach to policing and many of the solutions to problems will require the participation of other agencies and bodies”. It was intended to ‘standardise policing practice’ (Newburn, Williamson & Wright, 2007: 210) and, through published ‘minimum standards’, to ensure common employment of intelligence-led policing as a particular paradigm. As such, compliance or conformity with the NIM minimum standards is necessary to provide an essential structure and framework. 
to ensure a common system to accumulate, analyse and employ intelligence products to aid decision making (associated with tasking and co-ordinating). However, the issue of ‘compliance’, covered in the next paragraph, generates a fundamental research question, without full compliance can the potential benefit of the NIM be secured, or even assessed?

*Compliance with the NIM*

From the police perspective, ‘compliance’ requires adherence to the model and the minimum standards ensuring there is a systematic adoption of intelligence-led investigation and policing, whilst organising operational policing over three geographical levels (designated 1, 2 and 3). In essence, level 1 deals with local issues; level 2 with regional issues; and level 3 with national issues, often engaging various agencies such as HM Revenue and Customs (HMRC), and the SOCA (Herdale & Stelfox, 2008: 172-3).

The Police Reform Act 2002 require that “*chief officers ensure that there are procedures in place throughout their force to monitor compliance with this code of practice and the National Intelligence Model Minimum Standards document of April 2003 (and with any successor document as directed by the Association of Chief Police Officers). Her Majesty’s Inspector of Constabulary will inspect and report on those procedures*” (NCPE, 2006: 12).

The ‘Guidance’ provides the required practical detail regarding assets and procedures to ensure compliance with the Code of Practice on the NIM (NPIA, 2010).

For non-police public agencies, there is no legal requirement to adopt the NIM, the Code of Practice or the minimum standards and, unlike the police, they are not subject to inspection. However, I would argue that ‘adoption’ of the model by a non-police agency (generally described as ‘compliance’) must embrace the core assets and intelligence-led processes and procedures outlined in the ‘Guidance’ to ensure a relative fit and standardisation with other users (ACPO, 2005: 60). From earlier research (Osborn, 2008) and professional experience, compliance has a more liberal interpretation within the public services, as an example, the Gambling Commission (2010) claim: “*we are compliant with the National Intelligence Model (NIM) which is a nationally recognised intelligence led business model used by law enforcement agencies*”. They then provide the following description of their compliance: “*information is collected by the Intelligence Department from a number of sources. This information is then collated, evaluated, analysed and developed in order to find links, associations and trends, and can be used to build a picture which is used to inform the decision making process of senior management*”. Similarly,
the Security Industry Authority (2010) claim in publication: “we use the National Intelligence Model to identify non-compliance and target our resources appropriately”. However, neither of the two organisations in this example, comply with, or conform to the NIM minimum standards (ACPO, 2005) in that they do not have the following: a definable intelligence strategy or requirement; a coherent control strategy; a forensic policy; nor a tasking and co-ordination group policy or system (ACPO, 2005: s.5: 113). In addition, neither of these agencies appear to host a limited access IT system “to communicate and then monitor the action and responses resulting from tasking and co-ordination decisions” (ACPO/Centrex, 2005: 114). As a supplement, this specific requirement was reviewed by both the DWP and the IPS, but it was determined that cost implications precluded further IT investment and that the extant case management system (CMS) was “sufficient for the supervision of investigators” (DWP, 2006: 9). For clarity, the following paragraphs will review and describe two of these elements, ‘tasking and co-ordination’ and the ‘intelligence strategy and requirement’.

The NIM: Tasking and Co-ordination
Tasking and co-ordination is “the heart of the business process” (Flood, 2004: 48; ACPO, 2005: 103) and a fundamental part of the NIM. For further detail, although not necessarily greater comprehension, I would refer the reader to the ‘Practice Advice on Tasking and Co-ordination’ (ACPO/Centrex, 2006). Tasking and co-ordinating is the NIM element that employs intelligence products in decision making as a critical element of the business process within NIM. Most visibly this takes the form of Strategic’ and Tactical Tasking and Co-ordination Group meetings. The original NCIS document on the NIM develops the concept of prioritising intelligence work in decision making and states: “...the strategic tasking and co-ordination group works from a single key intelligence product, the strategic assessment, on the basis of which it sets the ‘control strategy’, an integral part of which is the setting of operational intelligence priorities, or an ‘intelligence requirement’. This directs the work of intelligence staff in the provision of intelligence to operational teams as well as continuing to provide strategic intelligence.” (NCIS, 200a: 13) In addition, and with specific regards to the ‘process’ of tasking and co-ordinating, the Metropolitan Police Service provided the following guidance:

“The Strategic Tasking and Co-ordinating Group (Strategic T&CG) sits twice yearly at each level and, informed by the Strategic Assessment, sets the Control Strategy for its area of command; it also approves an Intelligence Requirement
that provides direction to all police staff regarding the collection of intelligence. The Tactical Tasking and Co-ordinating Group (Tactical T&CG) sits at least fortnightly at Borough Command Unit (BCU) and force levels, and 3-monthly at a regional level. Informed by the Tactical Assessment and the resources available, it prioritises the proposed tactical activity for the BCU, force or region for the next period and ensures that it is aligned to the priorities identified within the Control Strategy. The Tactical T&CG also commissions the remaining two Intelligence Products: the Problem Profile and the Target Profile, as and when required, and prioritises the tactical activity to be taken against each.” (MPA/MPS, 2005: 6).

Therefore ‘Tasking and Co-ordination Groups’ (TC&G), for agencies adopting the NIM, are the ‘decision makers’ – determining areas of intelligence collection; operational focus; and the direction and allocation of resources in response to a range of intelligence products. Their effectiveness will, inevitably, be dependent upon the quality of the intelligence (Herdale and Stelfox, 2008). For public services, the Strategic Tasking & Co-ordination Group (ST&CG) should include a collection of senior agency and operational managers, supported by a crime analyst, ideally sitting twice yearly to review the ‘current state’ in the form of a ‘strategic assessment’. The purpose of the ST&CG is to set and amend the ‘control strategy’; sanction the ‘intelligence requirement’; and set the ‘prioritisation of resources’ (ACPO, 2005: 76), effectively providing direction for investigative staff on the collection of intelligence; and a ‘control strategy’ that delivers priorities for the next 6 months. The Tactical Tasking & Co-ordination Group (TT&CG) should be a collection of operational managers, and possibly investigators and intelligence officers, supported by an analyst, who sit fortnightly. They are informed by the ‘tactical assessment’ and review current investigative activity (monitoring); determine operational activity (tasking) ensuring that this is aligned to the control strategy (in line with the set strategic priorities of the organisation or division). They can determine whether to respond either reactively (in response to identified criminality) or proactively (more aligned to crime prevention).

The core business processes of the NIM, fuelled by intelligence products, critically rely upon the products of the strategic’ and the tactical tasking and coordinating groups comprising the key decision makers. These two groups are the means by which police and law enforcement managers ensure the exploitation of intelligence gathering products to apply the various elements of the National Intelligence Model to their area of responsibility (Stelfox, 2008). According to Newburn, Williamson & Wright, (2007) the Tasking and Co-ordination Groups, drive NIM at each level comprising, of resource managers with the
authority to collate and direct appropriate resources. Indicative of the importance and primacy of the tasking and co-ordination process the ‘Practice Advice on Tasking and Coordination’ (ACPO, 2006: 8) proposes that half (66 of the 135) of the NIM minimum standards relate to it.

In summary, tasking and co-ordination is undertaken by two groups within a NIM-adopting organisation the ST&CG and the TT&CG. The NIM minimum standards do permit local determination of the chairing of the T&CG meetings however, it also provides general guidance on the roles and police ranks for chairs of both the tasking and co-ordination group meetings. To meet the criteria, agencies must ensure that the individuals appointed to chair such groups have ‘executive authority’ empowering them to make resource decisions (ACPO/Centrex, 2005: 126). In addition, the role of the chair should be supported and complemented by an ‘Actions Manager’ in the role of an ‘enforcer’ – arranging the execution of agreed actions (this role may also carry the role of briefing manager); monitoring progress; and feeding back results. The purpose of tasking and co-ordination is therefore to determine and communicate decisions and directions based on the ‘development of intelligence products’, (ACPO, 2007: 13).

The guidance requires that operational tasking directions are based upon the products of intelligence gathering and analysis and, for police, that there are five types of meeting identified that should impact on the work and activities of both intelligence and investigative staff. The pinnacle of the decision pyramid (see Figure 2.3 on page 24) is the ST&CG, which sets the ‘control strategy’ to prioritise work for the department, region or organisation according to an ‘agreed, manageable range of issues’ against which resource allocations can be made for the next 6-12 months. It also sets the intelligence requirement that directs and focuses activity to gather, evaluate and collate information/intelligence regarding crime (and disorder) problems. Directly beneath this group sits the TT&CG required to prioritise issues highlighted in the tactical assessment; review the intelligence requirement; and to allocate operational and support resources having determined the best methods of dealing with ‘prioritised crime’ (and non-crime) problems. There are three associated, and generally subordinate meetings to respond to the ST&CG & TT&CG decisions and these are the: Intelligence Unit Meetings, (IUMs); Daily Management Meetings, (DMMs) and Neighbourhood Co-ordination Meetings, (NCMs) – all of which are required to monitor operational and tactical ‘progress’ and ensure that the directions
from the ST&CG and TT&CG are observed. From the non-police perspective, these meetings, e.g. IUM, DMM and NCM are likely to have very limited relevance for intelligence units (where they exist) and to investigators who focus on an extremely narrow field of criminality, viz. fraud.

**Figure 2.3: The tasking and co-ordinating groups identified in the NIM**

In practical terms, the responsibility for management and delivery of the information and intelligence used by both tasking and co-ordination groups is conducted by crime (tactical) and intelligence (strategic) analysts, based within intelligence units. Crime analysis is a relatively new profession to the police, but one that has received significant
impetus since the introduction of the NIM. A review of the analyst’s role, partly arising through some managers’ misinterpretation of what the function entailed, identified that the role is slowly developing away from simply generating the visual representation of data and intelligence using crime pattern analysis and mapping technology, with analyst’s now providing advice on resourcing and prioritisation to senior police managers (John and Maguire, 2004).

However, without a good understanding, support and direction from senior managers, analysts are frequently used to simply provide management information and to create graphical representations of areas; with the opportunities for creative interpretation of problems and potential responses being minimised (Osborn, 2008). This reality contradicts Cope’s (2003: 340), drawing upon Gill (2000), who views crime analysis as involving “the synthesis of police and other relevant data to identify and interpret patterns and trends in crime, to inform the police and judicial practice”. However, Cope (2004: 201), in reviewing the integration of borough crime analyses within two police forces, did identify cultural and understanding gaps between police and analysts and this research suggests that this is replicated between managers and crime analysts (when employed, e.g. DWP) in public services.

Intelligence Requirement
A strategic assessment and consequent ‘intelligence requirement’ or strategy, described by John & Maguire (2002: 212) as “informed by analysis of problems ... and by priorities imposed ... by internal and external bodies”, is required to conform with Element 1 of the (NIM) minimum standards, (see Annex 1: 183). This was not a feature of the KPM and was not encountered in non-police public services in previous research (Osborn, 2008) or professional exposure. The term ‘intelligence requirement’ is undefined by the NPIA (2009) and the ‘Guidance’ describes it as “a dynamic document” that focuses on ‘priorities’ and “other key threats identified in the strategic assessment” (ACPO, 2005: 65). From the police perspective it appears to mean “the gap between what is known and what is not” (Gwent Police, 2010: 10) and, potentially, requires a dedicated intelligence gathering resource, such as Operation Intelligence Units, that are not universal to public service investigative communities.
A broader definition of an intelligence requirement is drawn from the Intelligence Services: “… need for the collection of information, or the production of intelligence. A requirement for intelligence to fill a gap in the command’s knowledge or understanding of the operational environment or threat …” (FAS, 2010: 4-15). Public services may benefit from an ‘intelligence requirement’ provided they have undertaken a strategic assessment and identified priorities; and this would potentially deliver benefit in partnership activities, particularly in determining shared objectives and goals. However, even within mainstream policing there appears to be variation, for example, North Yorkshire Police have attempted to describe the aim of the ‘intelligence strategy’ as “to guide development of focused and coordinated NIM centred, intelligence-led policing” (NYPA, 2007: 4), which may not prove particularly helpful to a public service investigative manager. Neither would further review, as what does not appear in the North Yorkshire Police documentation is an actual ‘intelligence requirement’. The theme of ‘intelligence requirement’ and ‘intelligence strategy’ (ACPO, 2005: 113) will be returned to under ‘policy transfer’ in Chapter 4.

NIM as a model to encourage productive partnership

The concept of ‘partnership’ for the police can be traced to two key documents, the first was Home Office Circular 8/84 (1984) that introduced the concept of the multi-agency approach to crime and was supplemented with the government launch of the ‘Safer Cities Programme’ (Phillips & Cochrane, 1988). The second document was the Morgan Report (Home Office, 1991) that, according to Walklate (2002), constituted the moment when the partnership approach to crime prevention became the underlying principles of policing policy. The benefits of collaborative working are proven from an operational resource perspective, potentially providing more personnel, shared expertise; and a greater volume of data and information. However, the investigative and intelligence resources within public services are, proportionately, very limited compared to the police and SOCA; severely reducing the capacity for collaborative operations. A further difficulty is that public service agencies are almost exclusively concerned (and governed through established performance indicators) with the investigation of criminal offences relating to identity and entitlement – those dominated by fraud.

Despite the apparent acknowledgement, within the broader public service, that partnership may deliver dividends to operational investigation (DCA, 2006; DCFS, 2009), earlier research (Osborn, 2008) identified scepticism from public service investigation and
intelligence staff regarding the dividends of joint working. A potential reason is that the majority of public service agencies do not have prosecuting authority and are often reliant upon the police or SOCA to ‘promote’ fraud offences for prosecution (although exceptionally, DWP and HMRC can progress independent prosecutions). This reliance and expectation is not always fulfilled. From personal experience, I am aware that for police and SOCA officers investigating and identifying ‘serious crime’, that any sundry fraud offences relating to benefit or passports disclosed may well be viewed as ‘minor’ and, in consequence, not recommended for prosecution to the Crown Prosecution Service. This factor may frustrate ‘working partnerships’ and a willingness on behalf of public service investigators to engage in collaborative work, as it requires both ‘shared investigative methodology’ (Fraud Review, 2006: 154-6) and, ideally, ‘increased police responsiveness to fraud reports’ (Levi, Burrows, Fleming & Hopkins, 2007: 94). The Fraud Review (2006: 128) noted in its interim report that fraud is not a national policing priority and that, with the sole exception of the City of London Police, ‘fraud squad’ numbers have been reducing – over 29% from 1998 (589) to 2006 (416) and thus providing less operational capacity, and potential willingness, to convert fraud investigations into prosecutions. This diminishing resource and commitment creates particular difficulties for public services without independent prosecution authority, essentially relying upon operational police ‘goodwill’ and support to meet their investigation performance targets. Unfortunately, the NIM is not perceived as a remedy for this situation as it imposes no requirement on the police (as the primary sponsors for prosecution to the Crown Prosecution Service) to recommend, with equal vigour, all identified offences resulting from collaborative investigation and partnership.

In this respect at least, the potential dividends from investigative partnership, although recognised by government (CDA, 1998); the police (GMPA, 2010; MPA, 2010; Strathclyde, 2009); and the National Fraud Authority (NFA, 2010b; 2011a; 2011b), are not unanimously shared by all public service investigative personnel. In fact, the term ‘partnership’, which has, almost, become a ‘mantra’ in contemporary policing circles, continues, in some cases, to experience a luke-warm reception by public service investigators and managers (Gilling, 2006). The NIM, as a potential facilitator of partnership, has not impacted upon the, parochial, perception of some agency investigators who believe that their organisations tend to be side-lined (particularly by the police and
SOCA) during joint working and this can be manifested by disengagement, personal jealousies and even professional rivalries.

Within the minimum standards for the NIM (ACPO/Centrex, 2005) partnership does not appear to be a significant consideration in the proposed activity (it is mentioned only four times in the 135 standards). However, it is acknowledged within the “Practice Advice Introduction to Intelligence-led Policing” (ACPO, 2007: 6) that NIM “is a business model used by the Police Service, and increasingly by other partners”, but this document provides no supporting evidence, detail or qualification as to the level of partner compliance, or its effectiveness. Preliminary research for this study determined that these claims, regarding the actual level of adoption and compliance, demanded further enquiry. There are a significant number of non-police investigators operating within the UK, the majority employed by public authorities and government agencies who are regularly engaged in serious criminal investigations, predominantly fraud. An example is the Department for Work and Pensions (DWP). The DWP employs 1800 investigative staff engaged in dealing with benefit fraud investigations and has adopted, at least in name, the National Intelligence Model (DWP, 2010b). However, joint working can take a number of forms and provide a pressing reason for partnership, when considering an ‘intelligence-led model’ and its insatiable appetite for data and information – “an intelligence led, problem solving approach to crime and disorder” (NPIA, 2009). The sourcing, acquisition and refinement of data and information delivers the fuel for investigation, decision making, problem solving and tasking and co-ordination and is reviewed in the following paragraphs.

The last 30 years have witnessed a proliferation of electronically ‘stored information’ within public services. This information provides an invaluable intelligence source for investigating crime, including fraud – and, for public services and commerce, providing a rich harvest of personal data, potentially delivering corroborative or contesting evidence to establish legitimacy of identity and entitlement. As an illustration, the approximate magnitude of this intelligence repository can be gauged by Table 2.1 below and, although not entirely dwarfing the Police National Computer (PNC), their records have a far broader scope than those accorded to the police (NCPE, 2005).
Table 2.1: Major National Databases in the Public Sector

<table>
<thead>
<tr>
<th>Database</th>
<th>Custodian</th>
<th>Coverage</th>
<th>Number of records</th>
</tr>
</thead>
<tbody>
<tr>
<td>DCI</td>
<td>DWP</td>
<td>UK; all people allocated a NINO since 1948, when the scheme was set up.</td>
<td>82 million (including 13.5 million records for people who are dead)</td>
</tr>
<tr>
<td>NHSCR</td>
<td>GRO(E&amp;W)</td>
<td>England, Wales &amp; Isle of Man; all people registered with an NHS GP when the system was created in 1991 plus people born since, or registered with a GP for the first time after 1991.</td>
<td>66.8 million (including 6 million records for people who are dead)</td>
</tr>
<tr>
<td>NHSCR</td>
<td>GRO(S)</td>
<td>Scotland</td>
<td>6 million (includes deaths since 1992)</td>
</tr>
<tr>
<td>Vital Events</td>
<td>GRO(S)</td>
<td>Scotland (Computerised searchable index, with digital images of all records capable of viewing by Government Departments via GSI).</td>
<td>All births, deaths and marriages recorded in Scotland since 1855.</td>
</tr>
<tr>
<td>UKPS</td>
<td>UKPS</td>
<td>UK; people who currently hold a UK passport, or have held or applied for one.</td>
<td>Database 55 million (includes 12 million with digitised photograph and signature)</td>
</tr>
<tr>
<td>Driving Licensing Database</td>
<td>DVLA</td>
<td>Great Britain; all people who have gained a driving licence since 1970 and most who have ever held one</td>
<td>44 million records (includes unknown number for people who are dead but DVLA not notified)</td>
</tr>
<tr>
<td>Electoral Register databases</td>
<td>Local Authorities</td>
<td>UK; people who will be 18+ in the coming year, who are eligible to vote and who register. The register is actually an amalgam of 480 local databases, rather than a single entity.</td>
<td>44 million records (includes small number – c.11,000 – of UK residents living overseas)</td>
</tr>
</tbody>
</table>

(Cabinet Office 2006; 85)

Although substantial advantages in investigation and intelligence-led decision making may be evident with partnership and data sharing, it is neither easy to exchange, nor commonplace between investigating agencies. Public service data bases are maintained in strict organisational silos; access is restricted and not available for trawling or review (and those restrictions may apply internally, e.g. DWP without documented and specific investigative objective). Without formal memoranda of understanding (MoU) or service level agreements (SLA) most agencies are highly reticent about releasing personal data and the substantial majority of data cannot be searched or directly accessed outside of any particular agency. An indication of the difficulty to lever personal data from public services was again indicated last year by a further appeal made by the National Fraud
Authority “public sector organisations should endeavour to meet lawful and proportionate requests” (NFA, 2010a: 9).

The resistance to ‘intelligence sharing’ in partnership appears to relate to organisational proscriptions resulting from unnecessary anxieties surrounding the Data Commissioner and the Data Protection Act 1998 (DPA). However, although the DPA does not inhibit the disclosure of data when investigating crime - section 29(3) permits this - it often appears to discourage criminal investigative access to personal data held by other agencies. This is particularly the case when attempting to work in partnership with the NHS (due to the sensitivity of their data) and HMRC for traditional and cultural reasons. I was informed in 2004 by a senior manager within HMRC that ‘the DPA trumps investigative access’, I interpreted this statement as an indication that the organisational concerns and anxieties regarding ‘disclosing personal data’, manifested in proscribed policy (IPS, 2008; DWP, 2009), precluded the advantages of accessing criminal intelligence and evidence. However, the potential difficulties of partnership between central public services and the police, as encouraged by the NIM, may not be typical and, since 1998, there have been statutory partnerships between the police and the Local Authorities (legislative support for joint working and intelligence sharing is provided for crime and disorder local partnerships by s. 116 Crime & Disorder Act, 1998). These are reviewed below to see if the proposal that adoption of the NIM can feasibly “... promote partnership working” (NPIA, 2009) or whether this may be too ambitious an objective for an intelligence-led business model.

Statutory Partnerships

Although not a direct feature of this research, statutory partnerships are worthy of inclusion in this introduction as they provide a mandatory example of joint working between the police and a public service agency, viz. Local Authorities. In addition, the Guidance (ACPO, 2005: 103) states that “The NIM is a tool that Crime and Disorder Reduction Partnerships should use to develop and deliver the strategic priorities...”. The Crime and Disorder Act 1998 (CDA) was significant for establishing a ‘statutory partnership’ between the police and a civilian authority within the UK. This legislative intervention by central government imposed responsibility for reducing crime and disorder in local authority areas in England and Wales on the police and local authorities (Hughes, 2008: 56). The Act has led to the incorporation of 376 Crime and Disorder Reduction Partnerships (CDRP). These partnerships are required to carry out and publish crime and
disorder audits, strategies and targets; consult with the local community; publish 3-year crime and disorder reduction strategies; identify targets and performance indicators; report annually on progress (Gilling, 2006). In addition, the CDA delivered to the local authorities and the police new powers and duties to develop multi-agency and community-based strategic partnerships to reduce crime and disorder in their locality.

The Crime and Disorder Act was apparently inspired by neo-liberal thinking; the Home Secretary commenting during the Bill’s second reading that it ‘represents a triumph of community politics over detached metropolitan elites’ (Straw, 1997). A review of the CDA’s stated objectives to strengthen the visibility, responsibilities, membership and role of local partnerships, partially undertaken in response to some expressed concerns regarding their effectiveness, was undertaken by the Home Office (2006). This failed to demonstrate any clearly evidenced ‘success’ Hughes (2006: 57) and summarised by stating ‘CDRPs have not been able prove their success in performance management terms’. From the review it was apparent that neither the NIM, nor ‘statutory partnership’, acted as an effective catalyst to facilitate joint working and productive collaboration between local authorities and the police. Even with a ‘shared agenda’; complementary targets; and with the guidance of the NIM, at least on the police side, productive partnership appears elusive and difficult.

The identified tensions between the police and CDRP members have tended to result in relatively narrow crime reduction strategies, rather than a ‘community safety’ agenda; driven by centrally dictated performance targets. In some instances ‘statutory partnership’ has not only failed to deliver, they may even have acted as a distraction to both police and local authorities (Home Office, 2006). James’ (2011: 253) research into the application of the NIM in mainstream policing found that whilst NIMs processes were fundamentally sound, in practice they were not applied and, despite a significant NIM-related activity, partnership participation was extremely limited.

Nevertheless, it would be unsafe to interpret the Home Office (2006) findings as indicating that crime reduction partnerships cannot work. There are some local, and relatively recent, examples where some multi-agency approaches are effective: the police acting in partnership with HMRC, Borders and Immigration Agency (BIA), the Security Services; and SOCA has delivered some excellent results. In addition, the ‘Greater Manchester
Against Crime Partnership Business Model’ (GMAC PBM) has demonstrated that data sharing and concerted collaborative working can effectively reduce crime and improve public safety (GMAC, 2010). The GMAC PBM is described as a business process model for partnership (multi-agency) working, which employs an ‘interpretation of the National Intelligence Model’ (John et al, 2006: 1-2). The GMAC PBM integrates a multi-agency approach to crime reduction while attempting to retain a formal, and productive, structure for action similar to the NIM (Ratcliffe, 2008: 150). However, even this success must be qualified as there is no direct evidence that it was the NIM that provided the catalyst or framework for successful partnership or collaborative working in that context.

Summary

The historical concept of gathering and exploiting intelligence, as an aid to investigation, was initially examined, reviewing Baumber’s (ACPO, 1975) recommendations and the subsequent reports and stimuli to ILP, notably from Pearce (ACPO, 1978) and Ratcliffe (ACPO, 1986). It provided a description of the Intelligence Cycle and the evolution of ILP as a business model and managerial philosophy (Ratcliffe, 2008: 6). From these origins, the development of the KPM and its introduction in 1993 were described. It identified the focus on four crime types: robbery, autocrime, burglary and drugs and the absence, within its profile, of a strategic element. It included a short review on the results of the KPM delivered (Amey, et al, 1996) including the positive endorsements it received for broader application (HMIC, 1995: 7).

A review of the NIM; qualifications for compliance and conformity; tasking and co-ordination, and the intelligence requirement was examined to provide an explanation of process embodied within the model and context for this study. It was evident that the architects and sponsors of the National Intelligence Model intended it to contribute to the reduction of general crime and fit contemporary policing structures whose core functions relate to general law and order and community safety. However, the test of the NIM as a potentially productive rational business model must rely heavily on the level of compliance and conformity by any adopting organisation or agency. Full adherence to the criteria outlined in the ‘Guide’ may be deliberately avoided, e.g. failing or refusing to resource the necessary ‘assets’ required, or unintentional or alternatively due to misunderstanding of the minimum requirements. In addition, the demands of the model on investigative practices may potentially create a tension between an agency’s primary function and the extant, and
more traditional, mechanisms of investigation and governance – a model that ‘fits’ the police, may not suit a different public service agency. The intelligence-led decision making and problem solving theme of the NIM is captured within the ‘tasking and co-ordination’ process. The terminology and requirements for tasking and co-ordination were reviewed and some simplification and summary has been attempted, although this retains an indication of the interpretative demands and challenges placed upon agency staff, if unfamiliar with police terminology.

The final part of this chapter reviewed the theme of partnership and provided an examination of the assertion by the NPIA that adoption of the model will “… promote partnership working” (NPIA, 2009). Earlier research (Osborn, 2008) suggested that the NIM was not considered a ‘partner-friendly model’ by a limited sample of public service investigators. However, for two of the agencies under review, the DWP and the IPS the primary reasons for adoption focused on embedding intelligence-led investigation into their processes and increased partnership (Kitchen, 2005; DWP, 2006; IPS 2006). Although not an essential requirement for partnership, it is evident that compliance with the model and providing a consistent investigative and decision making methodology would deliver some benefits and this is encouraged in the ‘Guidance’ stating that the NIM is a model that “is not confined to, or restricted for specialist usage” (ACPO, 2005: 3.1.3). In addition to potential resource benefits of collaborative working, the opportunity for ‘data sharing’ was also reviewed and an illustrative table (2.1) was included to indicate the magnitude, breadth and potential value in intelligence-led investigation, of data held in major national databases within the public service.

The NIM was intended to have a relatively broad appeal – for adoption and application beyond the police service (Home Office, 2002; europarchives, 2009). The model has been adopted by a number of non-police public organisations and agencies with a criminal investigative capability, essentially to promote intelligence-led investigation and to enable partnership and collaborative working (Kitchen, 2005). However, the core business areas the NIM identifies (NCIS CD-ROM 1999: Fig. 1.1) are broad and encompass disorder and community problems as well as crime. The outcomes defined by the NIM adopt similarly broad terminology as in ‘community safety’, ‘reduced crime’, ‘arrested/disrupted criminals’, ‘managed hotspots’ and ‘potentially dangerous offenders’ (John & Maguire, 2007: 211). The former elements have evident importance to society; general policing; and
local authorities with statutory partnership responsibility. In addition, it is proposed that business outcomes could be achieved through a variety of ‘policing methods’ including: ‘intelligence, reactive operations, proactive operations and patrol resources’. However, potentially these will have limited appeal or relevance to central public services e.g. Identity and Passport Service, Department for Work and Pensions, and Driving Standards Agency and may impact upon the levels of compliance to the model. A review and description of the methodology employed in determining the operational relevance; conformity; and potential benefit of the NIM within the three agencies mentioned above is provided in the following chapter.
Chapter 3: Methodology

Introduction

This chapter provides a description of the considerations and rationale of the methodology employed for this research. The first part of this chapter deals with the potential contribution from previous research and the motivation for the study followed by the parameters of the investigation. It includes a description of the principal non-police public services included within the body of the research; the design; data collection; and primary research. This is supported with details of the research sample, ethical issues and describes the application of conceptual content analysis employed in refining the raw data. The final part of this chapter provides a rationale and justification of the research method.

Contribution to knowledge

An initial review and limited survey (Osborn, 2008), indicated that, with the exception of local authorities, little specific research had been published on the qualitative adoption of the NIM by non-police public services with an investigative capability. My preliminary findings, whilst formulating the research proposal and drawing upon recent consultancy experience, suggested that there was limited conformity with the NIM minimum standards or to the key ethos of the model relating to intelligence-led decision making within public services. These findings refuted the claims of conformity to the model by a number of public services, e.g. IPS, DWP, Child Support Agency (CSA) and Criminal Records Bureau (CRB). A similar level of non-compliance was not evident in the police, albeit research has identified a substantial number of variations of implementation between constabularies (James, 2011). An allied agency, the Serious Organised Crime Agency (SOCA), sharing a core business purpose with the police, has also adopted a revised version of the NIM. As an example, it currently does not employ qualified criminal analysts to provide refined intelligence products for tasking and co-ordinating (RS03 and RS08). From my exposure to public services it was evident that the adoption of the published version of the NIM was relatively superficial. It appears that, without adopting the core processes, implicit for full compliance, within the guidance and minimum standards (ACPO, 2005), these agencies were unlikely to derive benefit from improved intelligence-led decision making. In addition, agencies continued to have difficulties in assembling, resourcing and funding the required ‘assets’ outlined in the NIM Guidance (Home Office, 2005) to support intelligence-led investigation.
I would argue that the continued selective and, in some cases, cosmetic adoption of the NIM throughout the UK intelligence and investigative community will inhibit the drive towards uniformity, joint working and, potentially, frustrate intelligence sharing and meaningful partnership. This is in conflict with the following ACPO statement: “NIM improves the opportunities to share intelligence across local and national levels of policing. It reduces barriers to effectiveness by producing standardised processes and language and creates a co-operative working environment.” (ACPO Centrex, 2005: 12).

The perpetuation and potential expansion of further public services practising different interpretations, versions and profiles of the NIM will exacerbate the standardisation of intelligence-led investigation and resource-based decision making at both a tactical and strategic level. In this research and previous consultation, I have identified a number of difficulties that public services investigators experience with the NIM that may frustrate broader adoption and compliance, resulting in potentially conflicting processes and inadequate tasking and co-ordinating. In addition, the minimum standards accompanying the model are perceived as complex and the language and terminology employed appear to contribute to the public service investigator’s view that the NIM has exclusivity to the police and similar criminal justice agencies (Osborn, 2008). Accompanying the difficulties in comprehension are chronic shortages of ‘NIM assets’ - the resources required for compliance. The findings have highlighted aspects of the model, and the minimum standards that may contribute to nonconformity by public services and, potentially, inhibiting closer parity and partnership with police practices.

Parameters, design, data collection and primary research
This research sought to establish whether the NIM is fundamentally accessible to, and suitable for, non-police public services. It engaged with operational investigative staff to identify whether the model supports the reduction of risk and vulnerability to fraud, and whether it provides a productive intelligence-led investigation model, facilitating partnership and joint working. It is argued that successful implementation of the NIM and performance (MPS, 2009; Durham Police, 2011) relies upon its adoption by operational staff – investigators, intelligence officers and their line supervisors. It is through their adherence to the model; compliance with the minimum standards; and adoption of intelligence-led processes, that conformity can be determined. Such conformity will provide a measure of the standardisation and commonality required to deliver the potential benefits associated with intelligence led decision making, investigation and effective
partnership. For this reason, the research findings will draw upon contemporary semi-structured interview responses; my earlier research undertaken as part of this Professional Doctorate; and professional experience in risk management consultancy over the last decade within the UK public services. The research was limited to non-police public services without a statutory requirement to work in partnership with the police, excluding the 376 Local Authorities operating in the Crime and Disorder Reduction Partnerships. It also excluded commercial organisations with investigative capability, e.g. the financial sector. The significant majority of the research was undertaken with investigative staff within three organisations: the Department for Work and Pensions (DWP); the Identity and Passport Service (IPS); and the Driving Standards Agency (DSA). These agencies were all identified within the Identity Fraud Study (Cabinet Office, 2002: 74-76) and are relatively representative, providing a reasonable spread, of different types of public service with investigative personnel (in size, budget and service).

**Department for Work and Pensions (DWP)**

The DWP is one of the largest government agencies (exceeded only, in staff terms, by the National Health Service) paying over £145 billion to more than 20 million customers each year, and administering over 30 different benefits, grants and allowances (DWP, 2010a: 12). It delivers a service as an amalgam of the Employment Service: resourcing Job Centres; the Benefits Agency administrating payments of state benefits; and the Pension Service paying state pensions both in the UK and overseas. Their ‘client group’ could generally be summarised as: the disabled, lone parents, pensioners and the unemployed. In the last decade it has employed between 1800 - 3000 investigative personnel; currently the number is approximately 1800 (DWP, 2010a: 22), continuing to be the largest single non-police public service employer of investigative staff. The DWP have traditionally been highly sensitive regarding their fraud vulnerability and have historically drawn criticism for marginalising the levels of risk and loss (Cabinet Office, 2002; 74) and more recently for exaggerating the same figures (McManus, 2010; Tunley, 2011). The DWP are featured in this research as a major public service, in terms of staff complement, social impact and financial responsibility. A further reason for its selection is that I have a good understanding of the DWP counter fraud systems, policies and procedures having trained and operationally engaged with their investigation/intelligence staff. I have worked as a lead consultant on its Change Team and designed and delivered a range of accredited investigation courses including: Criminal Intelligence Analysis; Accredited Counter Fraud
Specialist (ACFS); Accredited Counter Fraud Managers (ACFM) and the accredited Protection in Security (PinS) Programme.

Identity and Passport Service (IPS)
The IPS is an executive agency of the Home Office that came into existence on 1st April 2006 being formerly known as the UK Passport Service. At its busiest periods, the IPS employs a little over 4,000 staff (seasonally varied) across the UK in 7 regional offices; 56 interview offices; the GRO in Southport; and the ‘centre’ based in London. Each region has an investigative team and this is supplemented by two Operational Intelligence Units (London and Glasgow) and a number of specialist units including the Major Investigation Team (Glasgow) amounting to approximately 90 investigative staff (McCluskey, 2011). The principal function of the IPS is to provide passport services for British nationals, in addition it has responsibility for the General Registry Office (GRO); the Office for National Statistics (ONS); and until 10th May 2010, the identity card initiative. In 2008-09 the IPS received 5.35m passport applications; issued 10,000 identity cards; and delivered 1.92m certificates (primarily relating to births, deaths, marriages and civil contracts). The IPS counter-fraud activities resulted in the investigation of 7,344 potentially fraudulent passport applications, representing a shortfall against a target of 9,407 (based on a projection from sampling exercises). Passport fee receipts fund all passport related activity; GRO services are paid for by a combination of fees collected and Home Office funding (IPS Annual Report, 2009-10). The IPS has featured in this research as a mid-range public service, in terms of staff complement and budget. In addition, I have considerable understanding of its counter fraud policies, procedures and investigation/intelligence staff having undertaken a full review and revision of the security and investigation policy and procedures in 2008. I have worked as a lead consultant on its Major Investigation Team and Operational Intelligence Unit Projects and designed and delivered a range of accredited investigation courses including: Accredited Counter Fraud Specialist (ACFS); Accredited Counter Fraud Managers (ACFM); Investigative Managers Course; and both Operational and Strategic Criminal Intelligence Analysis.

Driving Standards Agency (DSA)
The Driving Standards Agency (DSA) is one of the executive agencies and a member of the Motoring and Freight Services (MFS) group, within the Department for Transport. It is a comparatively compact public service, operating on a budget of £184m, mainly funded through fees and revenue from other road safety initiatives. The DSA Headquarters is
located in Nottingham, with administrative centres in Cardiff and Newcastle. Driving tests are administered from over 400 driving test centres and 140 theory test centres and during 2009-10 the DSA conducted 1.8m practical driving tests. In the same year the DSA concluded 416 criminal investigations concerning 1,491 individuals suspected of being involved in impersonation/identity fraud; it concluded 394 cases involving illegal driving instruction; and together with police support arrested 311 individuals (56 successfully prosecuted).

In March 2010 (DSA, 2010), the DSA employed 2,568 staff of which approximately 20 were engaged in, and associated with, investigative and intelligence gathering duties. The DSA features in this sample despite the paucity of staff engaged in investigation as it provides a reasonably typical example of a number of smaller executive agencies with substantial regulatory responsibility. Impersonation fraud, relating to driving tests (both theory and practical), have increased with the introduction of a more challenging driving licence ‘pass criteria’. This, together with the investigations relating to unregistered driving instructors, ensures that the limited team of approximately 20 professional investigators all carry heavy workloads. Nevertheless, in November 2009 the DSA were awarded ‘The National Identity Crime Single Point of Contact Award’ in recognition of their contribution to the national ‘fight against identity crime’. Another ‘selection qualification’ for the DSA is that I have considerable understanding of its counter fraud policies, procedures and investigation/intelligence staff. I have worked as a consultant and trainer with the Operational Intelligence Unit Project (Cardiff); designed and delivered a range of accredited investigation courses including: Accredited Counter Fraud Specialist (ACFS) and the Accredited Counter Fraud Managers (ACFM) programmes to its investigative management and personnel.

**Research design**

As the researcher it was necessary to acknowledge my objective limitations as a former consultant and trainer within the organisations under review. Gurbich (2004: 4) supports the premise that the researcher cannot be separated from their “background, life experience and memories”. I acknowledge that these frames of reference may filter and potentially distort my impressions of the action, behaviour and responses of others. This may be particularly the case as a Professional Doctorate student, when attempting to empirically test assumptions drawn from professional exposure and experience. Lee (2002) had reviewed the impact of the researchers’ life experience on both research methodology and
(to a lesser extent) the evaluation and assessment of empirical products commenting on the difficulty of suppressing and avoiding self-reflectivity. It was apparent that the researcher’s ambition to be objective and rational can be frustrated by the ‘modern self’; formally ‘socialised’ and ‘normalised’. Added to this potential ‘experimenter bias’, Heisenberg (1949:3) postulated that the very action of ‘observation’ (and to a lesser extent ‘measurement’) of an object “can cause uncontrollable changes in the system being observed”. As a researcher I acknowledged that I may encounter “unavoidable frustration and potentially inhibition in the search for answers, truth and reason” (Kant, 1781/1901), attempting to put aside assumption and preconception from previous exposure to the public services under review. Davies (2007: 9) suggested that discovering answers to questions is “the purpose of research…the application of scientific procedures”. He appears to refute the limitation of Lee (ibid) imposing a universal real world framework, thus enabling science to exist, although he does recognise both ‘experimenter’ and ‘experimental bias’. Having a comprehensive understanding of the processes and investigation culture under review I was aware of the potential to unintentionally bias or prejudice the research. Acknowledging that these factors can potentially amplify the risk (Bell, 1999; Yates, 2004), for the period of this research I have deliberately not engaged in any professional operational activity with the agencies under review. Nevertheless, Locke’s proposition (cited in Lowe, 1995) that our intellect relies, exclusively, on our senses may suggest that, unwillingly, I may have been deceiving myself through a ‘research fallacy’ simply seeking to affirm an idealistic perception and employing sense data that is ontologically privileged. Coleman (1999) supports a realist epistemological approach; essentially based on a critique of positivism (but not a rejection of it). He embraces the views of Davies (2007); whilst apparently attempting to tread a compromising path between the modernist and the classical view. Coleman (1999) suggests that realist studies employ (and potentially exploit) science for ‘discovery’ and to study and describe hidden mechanisms and structures of reality, albeit these may be beyond our immediate experience but within our sensual perception. He explains that observational data are the manifestation of “the workings of hidden reality and, facts are acknowledged and explained by the revelation of casual links from ‘structural mechanisms”’ (Coleman, 1999: 11).

Sobh (2006) argues that epistemology is the relationship between reality, ontology, and the researcher, whilst Hamlyn (1995: 242) suggests that its epistemology deals with ‘the nature of knowledge, its possibility, scope and general basis’. By employing an epistemological
approach I am seeking an effective way of understanding and explaining how we know what we know. It deals with the “the nature of knowledge, its possibility, scope and general basis” (Hamlyn 1995: 53); “and is concerned with providing a philosophical grounding for deciding what kinds of knowledge are possible and how we can ensure that they are both adequate and legitimate” (Maynard, 1994: 28). Bahari (2010: 18) states that the qualitative methods, adopted in this research, are typified by narratives, ethnographies and case studies. This is supporting proposals that these are characterised by the development of a theory as a result of empirical data (Saunders, et al 2007: 17). In addition, Bryman (2004: 266) states that qualitative research normally emphasises words rather than qualifications in the collection and analyses of data. By adopting an inductive approach it was necessary to gather information from participants and to process and develop the information into themes; broader patterns, theories or generalisations. Finally, these findings are compared with personal experience and existing literature related to the topic; according to Rocco et al. (2003) this inductive logic or qualitative method is generally associated with understanding a particular phenomenon in a social context. From an epistemological point of view, the objective truth can be “exposed because understandings and values are objectified in the people being studied” (de Quiros, Aranda-Mena, Edward & Calder, 2007: 2-3); extending this position meaning is not so much discovered, but constructed – there being no ‘objective truth’ to be discovered. The philosophical or worldview considerations have been acknowledged, and I have qualified the research design to complement this form of pragmatic investigation and social research (Grady, 1998).

In summary, I acknowledge the limitations to this operational research (Saunders, Lewis & Thornhill, 2003) and I have endeavoured to counter a number of the associated risks, by adopting a ‘systematic approach’ and employing a transparent “investigation and ethical process”, trusting that this supports my enquiry and that the research findings are based upon a logical relationship and not just ‘supposition’ or belief (Ghauri and Gronhaug, 2002: 38). In this respect, I have acknowledged that it would have been unsafe for this research to have been exclusively reliant upon my professional consultancy experience with the public services. This experience can ‘inform’ my primary research findings by supporting context placement and narrative interpretation, but in isolation, it cannot form the basis of argument or proposition. In accordance with the advice of Stake (1995: 240), I have aspired to objectivity, giving proper regard to validity and reliability being provided
with this salutary reminder that ‘criteria of representation ultimately are decided by the researcher’. I have adopted an interpretive approach to this research, acknowledging my intimate relationship with the subject under review together with the “situational constraints shaping this process” (Rowlands, 2005: 81). Therefore this interpretive research does not seek to predefine variables, nor does it set out to test hypothesis, rather it aims to produce an “understanding of the social context the phenomenon and the process whereby the phenomenon influences and is influenced by the social context” (Walsham, 1959 cited in Rowlands, 2005: 81-82).

Research Design

Data collection

This research has drawn upon current published and archival data relating to the National Intelligence Model; the foundational sources being dominated by Home Office, Centrex, NPIA and ACPO. To supplement this, and to provide a general history to the origins and foundations of the NIM, I have reviewed both biographical and autobiographical sources of key players in its development (Mark, 1978; Flood, 2004; Grieve, 2004; and Phillips, 2008). In addition, and as part of a sequential and cumulative collection of studies, I have plundered my own research from the four years Professional Doctorate Programme and empirical findings from my work as an Investigative Consultant and Change Manager with the public services since 2001.

Primary Research

Initially, I determined to employ mixed method research; employing both an electronically circulated survey and supplementing the findings with a limited number of semi-structured interviews. However, despite a reasonable return (17%) in the survey’s pilot, results from an initial ‘live trawl’ harvested an empirically unacceptable response. A review of the completed surveys, together with the emerging findings from the structured interviews, revealed potential indicators for the low return. Fundamentally, the majority of public service investigative staff appeared unfamiliar with the requirements and purpose of the NIM minimum standards and this incomprehension may have contributed to the poor return. Initially, faced with disappointing survey results, I reviewed the methodology, avoiding the temptation to simplify the questions for a potentially naïve audience, as this would have frustrated the focus of the research. Saunders, et al (2001) suggests that the researcher may suffer from poor return rates and further describes the limitations of
questionnaires with regards to responses, potentially, failing to describe the underlying reasons for ‘outcome’. I therefore determined to expand the research sample for interview – employing, in its simplest form, a ‘guided conversation’ (Kvale, 1996; Atkinson et al, 2001), with a specific aim and a blend of both inductive and deductive methodology (Perry, 1998).

Sample, ethics and content analysis
As a direct consequence of the low response to survey, I increased the subject database of those willing to be engaged in semi-structured interview from 24 to 49 (2 transcripts were not employed at the subject’s request). Qualitative semi-structured interviews were employed as the key method for primary research (see Appendix 4), partially to compensate for discontinuing the survey and in the expectation that the qualitative nature of the data would improve. The qualitative interview is argued by Sewell (2009) as being the most useful social research tool for understanding the meaning and impact on a programme or process to its participants. The interview is capable of identifying variations to implementation (and partial or non-adaption), application and conformity; and of exploring individual differences between people’s understanding and experiences. Bell (1999) suggests that the main advantage of the interview is its adaptability providing the field researcher with an opportunity to develop the research themes based upon the answers and cues provided by the respondents. It avoids the limitations imposed by the ‘fixed’ nature of a questionnaire and provides an opportunity for ‘follow-up’; to probe responses, ‘dig deeper’ or seek clarification (Bell, 1999). In addition, interviews can provide the researcher with a more comprehensive understanding of features beyond simple ‘process’ or ‘application’, potentially introducing the critical background, environment, attitudes and motivations (Gilbert 2001).

Perry (1998: 791) reported that a doctoral thesis would require an overall sample of between 35 to 50 interviews to obtain meaningful results and this acted as a guide in determining the final research population of 47 interviewees. As can be seen from Table 3.1 below, these were broadly and proportionately distributed between public services in accordance to the size of their investigative community with the DWP contributing 36% of the interviewees; the IPS: 23% and the DSA: 13%. In addition, the sample size was sufficient to demonstrate that further data collection, through structured interview, was unlikely to reveal substantially new data, viz. within the themes and content analysis
categories established (Douglas, 2003; Goulding, 2002; Locke 2001). I deliberately applied convenience sampling to the significant majority of interview subjects who are currently actively engaged as investigation staff operating in non-police public services. This form of sampling is justified by Morse (1994: 228) who recommends that respondents are selected from those “who have the knowledge and experience the researcher requires, have the ability to reflect, to articulate, the time to be interviewed and is willing to participate in the study”. I employed an interview schedule (Appendix 4), that was itemised, to support evaluation and analysis, and supplemented this with a scripted introduction for face-to-face interviews. This was in accord with Kumar’s (2005) recommendations that differentiate between the structured schedule as a qualitative research tool, and the interview itself which is recognised a method of data collection. This provided some advantage in that it delivered ‘[relatively] uniform responses which assures the comparability of data’ (Kumar, 2005: 126).

I had determined to provide agreeable subjects with an original copy of the NIM minimum standards and a revised and simplified set for review and comment. In respect of eliciting and interrogating feedback, the interview delivered a more adaptable research tool than the questionnaire, facilitating both ‘follow up’ and probing supplementary questions, whilst permitting an opportunity for clarification of a response denied to the research when using a remote survey. I employed ‘qualitative interviewing’ in thematically semi-structured format; combining both open and closed questions. Responses were faithfully and contemporaneously recorded; to facilitate content analysis and amplify its products in an attempt to capture both emotion and attitude. This approach permitted the participant to describe what was meaningful or important to them in their own words – not being restricted by predetermined categories.

The semi-structured nature of the face-to-face interviews provided a good degree of control, reliability and speed (Smith, 2003); the interview structure maintaining a deliberate direction over the process and, arguably, with a consistent format, provided reliable data gathering. Prior to interviews all of the subjects were contacted, their consent, to engage in the research, was confirmed and they were offered a pre-interview opportunity to review the original NIM minimum standards (Annex 1) and an ‘unaccredited and revised edition’, reduced to 40 sections (Appendix 3). It was emphasised to subjects that to decline reviewing either the ‘original’ or ‘revised’ minimum standards would not
exempt them from being interviewed. The majority of the respondents 40 (85%) of the subjects agreed to review the pre-interview data, RS01–RS25 and RS33-RS47, and this was provided electronically 14 days before the scheduled interview. A summary of interview subjects is shown in Table 3.1 with an indication of the proportionate contributions to the target population. The subjects who were not provided with pre-interview standards, viz. staff from CRB, DSA, DVLA and DWP, are shown in parenthesis.

The sample provided a broad division of 40% managers and 60% of investigators/intelligence officers. Respondents were selected on the basis of their knowledge, experience and role and I applied purposive sampling to ensure a range of subjects, drawn from both the intelligence and operational investigative community. The majority of respondents were known from previous consultancy and training programmes within the public services. The disproportionate representation of managers (40%), when applied to the workplace, was deliberate and manipulated over the course of the research. This was in response to the investigators and intelligence officer’s apparent limited familiarity, with organisational policy, partnership and collaborating working, revealed in earlier in the research (Osborn, 2008).

**Table 3.1: Interview respondents by public service and role (n=47)**

<table>
<thead>
<tr>
<th>Agency</th>
<th>% of ∑</th>
<th>ACP</th>
<th>O</th>
<th>Senior Manager</th>
<th>Investigation Manager</th>
<th>Intelligence Manager</th>
<th>Crime Analyst</th>
<th>Intelligence Officer</th>
<th>Investigator</th>
<th>∑</th>
</tr>
</thead>
<tbody>
<tr>
<td>CRB</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(1)</td>
<td>1</td>
</tr>
<tr>
<td>DSA</td>
<td>13</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2+(1)</td>
<td>6</td>
</tr>
<tr>
<td>DVLA</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(1)</td>
<td>2</td>
</tr>
<tr>
<td>DWP</td>
<td>36</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6+(2)</td>
<td>17</td>
</tr>
<tr>
<td>IPS</td>
<td>23</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5</td>
<td>11</td>
</tr>
<tr>
<td>Police</td>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>SOCA</td>
<td>13</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>100</strong></td>
<td><strong>2</strong></td>
<td><strong>4</strong></td>
<td><strong>10</strong></td>
<td><strong>3</strong></td>
<td><strong>2</strong></td>
<td><strong>4</strong></td>
<td><strong>19</strong></td>
<td><strong>47</strong></td>
<td></td>
</tr>
</tbody>
</table>

**CRB:** Criminal Records Bureau;  
**DSA:** Driving Standards Agency;  
**DVLA:** Driver and Vehicle Licensing Agency;  
**DWP:** Department for Work & Pensions;  
**IPS:** Identity and Passport Service;  
**SOCA:** Serious Organised Crime Agency
The professional profile of the interview subjects is shown below, together with the identification code that is employed for citations within this report. The respondents shown in Table 3.2 accepted the invitation to review and comment on original NIM minimum standards (Annex 1) and the unaccredited revised NIM minimum standards (Appendix 3) prior to interview.

Table 3.2: Subjects who reviewed the NIM MS and Revised MS

<table>
<thead>
<tr>
<th>No.</th>
<th>Code</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>RS01</td>
<td>ACPO member (Police)</td>
<td>RS18</td>
</tr>
<tr>
<td>RS02</td>
<td>ACPO member (Police)</td>
<td>RS19</td>
</tr>
<tr>
<td>RS03</td>
<td>Investigation Manager SOCA</td>
<td>RS20</td>
</tr>
<tr>
<td>RS04</td>
<td>Investigation Manager SOCA</td>
<td>RS21</td>
</tr>
<tr>
<td>RS05</td>
<td>Investigator SOCA</td>
<td>RS22</td>
</tr>
<tr>
<td>RS06</td>
<td>Investigator SOCA</td>
<td>RS23</td>
</tr>
<tr>
<td>RS07</td>
<td>BITSU Intelligence Officer SOCA</td>
<td>RS24</td>
</tr>
<tr>
<td>RS08</td>
<td>BITSU Intelligence Officer SOCA</td>
<td>RS25</td>
</tr>
<tr>
<td>RS09</td>
<td>Investigation Manager DWP</td>
<td>RS33</td>
</tr>
<tr>
<td>RS10</td>
<td>Intelligence Manager DWP</td>
<td>RS34</td>
</tr>
<tr>
<td>RS11</td>
<td>Investigator DWP</td>
<td>RS35</td>
</tr>
<tr>
<td>RS12</td>
<td>Investigator DWP</td>
<td>RS39</td>
</tr>
<tr>
<td>RS13</td>
<td>Crime Analyst DWP</td>
<td>RS40</td>
</tr>
<tr>
<td>RS14</td>
<td>Crime Analyst (retired 2010) DWP</td>
<td>RS41</td>
</tr>
<tr>
<td>RS15</td>
<td>Investigator IPS</td>
<td>RS45</td>
</tr>
<tr>
<td>RS16</td>
<td>Investigator IPS</td>
<td>RS46</td>
</tr>
<tr>
<td>RS17</td>
<td>Investigation Manager IPS</td>
<td>RS47</td>
</tr>
</tbody>
</table>

Table 3.3 below provides details of investigative staff and managers who were interviewed, but declined to review or comment upon the revised NIM minimum standards.
Table 3.3: Subjects who did not review the NIM MS and revised MS

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>RS26</td>
<td>Investigator DVL A</td>
<td>RS30</td>
<td>Investigator DWP</td>
</tr>
<tr>
<td>RS27</td>
<td>Investigator CRB</td>
<td>RS31</td>
<td>Intelligence Manager DSA</td>
</tr>
<tr>
<td>RS28</td>
<td>Investigator DWP</td>
<td>RS32</td>
<td>Investigation Manager DVLA</td>
</tr>
<tr>
<td>RS29</td>
<td>Investigator DSA</td>
<td></td>
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</tbody>
</table>

The following respondents shown in Table 3.4 declined interview or, at the schedule appointment, were unavailable for full interview, but were willing to provide a written response to the questions and review the proposed revised NIM minimum standards (MS).

Table 3.4: Subjects who reviewed the NIM MS and revised MS providing written responses

<p>| | | | |</p>
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<tbody>
<tr>
<td>RS36</td>
<td>Investigator DSA</td>
<td>RS42</td>
<td>Investigator DWP</td>
</tr>
<tr>
<td>RS37</td>
<td>Investigator DWP</td>
<td>RS43</td>
<td>Senior Manager (retired) Police</td>
</tr>
<tr>
<td>RS38</td>
<td>Investigator IPS</td>
<td>RS44</td>
<td>Senior Manager (retired) Police</td>
</tr>
</tbody>
</table>

When consent was given, interviews were recorded, faithfully transcribed and securely stored in an encrypted format. On three occasions, subjects requested that the interviews were not electronically recorded, but consented to my 'note taking'. To support the frequency and pace of the interview, these notes did not form a contemporaneous record, although I employed short hand notes to support a summary of the interview. Following the initial transcription of the recorded interviews, I employed a denaturalised approach, removing any idiosyncrasies of speech. Oliver, Serovich and Mason (2005: 1273) argue that transcription is a 'pivotal aspect of the enquiry' and the transcription processes have been described in terms of a continuum. At one end lies 'naturalism' in which everything in the interview is transcribed with as much detail as possible – reflecting a verbatim record of speech (Shagloff, 1997 cited in Oliver, et al, 2005) and acknowledging that the spoken responses provided an individual’s actual construct of reality. At the other end lies 'denaturalisation', the transcript suggesting that within the speech ‘are meanings and perceptions that construct our reality’ (Cameron 2001 cited in Oliver et al, 2005:1274).

The thematically semi-structured interview framework covered the following aspects of the research: compliance with the NIM; perceived impact on risk or vulnerability to fraud; impact on partnership and ‘joint working’ (a more familiar expression than partnership to
non-police public services); whether the NIM is a productive business model; whether the NIM improves efficiency or effectiveness of investigation; and (to those respondents who had agreed to review them: RS01 - RS25 and RS33 - RS47) seeking critique on the revised NIM minimum standards. The questions were initially framed and then trialed; as a result of feedback, they were edited and converted to a semi-structured interview protocol (see Appendix 4).

Ethical Issues
This research was carried out with the approval of the University of Portsmouth Ethics Committee and in strict adherence to the consent provided to the terms and conditions outlined in the Research Proposal (approved in 2009). The study was designed and undertaken consistently and fairly to preserve the honesty, integrity and quality of the findings. All participation was voluntary and the research was undertaken openly, without deception and all subjects were free to withdraw at any time. It was evident from earlier research (Osborn, 2008) that subjects had expressed a heightened sensitivity to this research theme and I considered it necessary to maintain a high level of anonymity to encourage openness and honesty in response. Furthermore, the majority of subjects continue to be employed within their respective agencies and may have experienced a sense of vulnerability should their responses be made public and interpreted as critical. Strict confidentiality was therefore assured to all respondents and this has been preserved throughout this study by the exclusive employment of nominal codes with limited descriptive data, i.e. role and organisation to identify respondents. All personal data and transcription has been encrypted and stored onto a MicroSoft Access database, on a stand-alone personal computer (without server or internet access). Following transcription, all electronic audio recordings, research diaries and schedule records relating to a subject’s code were securely deleted; and the original manuscripts and notes were destroyed. In two examples, the role description (in Tables 3.2 - 4) has been amended and generalised to frustrate identification, due to specialised nature of the subject’s role.

Prior to any request for interview, subjects were provided with an information sheet and invited to complete a consent form, these consent records were converted to electronic copies, encrypted and stored onto as separate IT system. Transcribed interview records were available to interviewees and on three occasions were requested and provided to the subjects in secure electronic files. Two subjects requested the withdrawal of their
interview transcript from this research, effectively reducing the research sample from 49 to 47. In accordance with their requests the transcripts; identities; and all associated data were deleted and no details have been employed in this report.

Content Analysis

Content analysis (CA) was employed to systematically examine the textual and transcribed material and is a technique that derives from the communicative services (Mayring, 2004). Qualitative and conceptual CA was used to ‘break down the text’ into a system of categories (Krippendorf, 1980). Conceptual analysis begins with identifying research questions and then coding responses into manageable content categories – the process of coding is basically one of selective reduction – reducing the transcript to categories of a word, set of words or phrases indicative of the research theme (Colorado State University, 2009). Carney (1973) supports the use of CA in interview-based social research stating that ‘it gets the answers to the questions to which it is applied’. In addition, CA can be inclusive as Mayring (2004) states “…qualitative content analysis does not seek to shut itself off from quantitative analytical procedures, but attempts to incorporate them into the analytical process in a justified way.” A rudimentary coding (categorical analysis) system was applied with a research focused interpretation – ‘there are scarcely any fixed rules’ (Flick, 2002: 185). The choice of CA was guided by Berelson (1971: 74) as ‘a research technique for the objective, systematic and quantitative description of manifest content of communication’. As such I employed it as a research tool, focusing on the actual content and internal features of textual media. It provided a comparative and descriptive format through the identification of certain words or phrases, themes, characters or sentences and can quantitatively present them in an objective manner. Although CA has been trialed on serial audio recordings, in this research it was exclusively applied to interview transcriptions, text summaries and written responses. The structured interview transcripts were subjected to conceptual CA (Palmquist, 2004); the respondents’ interview transcripts being manually coded into manageable context categories employing the prescribed form of ‘selective reduction’. Alternative CA processes and software was reviewed, but not employed – the industry leader being ‘NUDIST’ when working with data management facilities (Proralis Research, 2008).

The CA was undertaken as part of the overall analysis evaluation, not intended as a ‘stand-alone’ process (Boyatzis, 1998) and complimentary to the review and evaluation of
identified policy, process and procedure within each public service organisation. It was relatively time consuming and, inevitably, the validity of the product may be questioned due to possible subjectivity, through selective questioning and intervention, categorisation and interpretation. I acknowledged this refining risk and the cautionary statement of De Dreu & West (2001: 163) “whether using literature review; card sorting or computer aided analysis, but all can emphasise the subjective nature of the sorting activity”. One method I employed to support the reduction of researcher bias was to employ a process of verification: using a ‘second rater’ to apply the categories that I, as the ‘first rater’, had generated. A common criteria is to use 80% agreement that categories are generally replicable (Krippendorf, 1980), having applied the ‘two-rating system’ to this research, I have sought to increase empirical validity (and reliability) whilst acknowledging the reservations of Flick (2002: 218) who states “the problems of how to assess qualitative research have not yet been solved”.

**Rationale and justification**

The thematic semi-structured interview as a qualitative research tool was adopted in compliance with a pragmatic view that research must ‘add value’ and be unequivocally useful to both the researcher and audience of the findings (Glaser & Strauss, 1967). I was guided by the methodological ‘tenets’ (and tools) described by Denzin & Lincoln (2000a: 14) who stated that the topics and concepts must be appropriate and relevant to the concept of the study. This is supported by Easterby-Smith et al (2002: 27) who argue that the methodology employed, ‘essentially a form of research philosophy’, will help to clarify research design; identify which design will work (and alternatively those that will not); and identify and even create designs outside of past experience. I maintained a healthy scepticism towards prior work, endeavouring to conduct this study with a relatively impartial view; intending that the products and findings of the research must explain processes and relationships – resulting from the researcher’s study (‘immersion in the field’) and that this properly reflect the dynamics of the study (Locke, 2001). I sought to generate enough data (and of sufficient quality) to illuminate patterns, concepts, categories, properties, associations and dimensions (Thompson, 2004). In this respect an appropriate sample size was established (Auerbach & Silverstein, 2003) achieving theoretical saturation (Glaser, 1992) and delivering data with a reasonably rigorous claim to true representation. Theoretical saturation was recognised in that further data yielded no additional information; no relevant data emerged regarding a determined category; the CA
categories were appropriately developed in terms of properties and dimensions demonstrating variation and; the relationship amongst (and between) categories were established and validated (Strauss & Corbin 1998: 212).

Summary
From earlier research (Osborn, 2008) and exposure to the public services, the operational investigative teams did not appear to be adhering to the criteria requirements of NIM despite organisational claims of ‘adoption’ and ‘conformity’. The potential benefits of the NIM, as an intelligence-led process, may not be accessible without conforming to the asset and procedural requirements (ACPO, 2005: 2.2.1: 101). This revised methodology was designed to identify, predominantly from investigative personnel, the level of conformity and where variations exist, the reasons. It focused on three public services that have ‘adopted’ the model representing different staff complements, budget and core businesses, the DWP, the IPS and the DSA to provide a broad spread of agencies. The initial intention to employ survey and structured interview was modified following trial and the research population was expanded to accommodate the exclusive use of interview. The qualitative semi-structured thematic interviews were ethically undertaken in line with the University of Portsmouth guidance and the findings were subject to content analysis employing selective reduction and categorical analysis as part of an overall evaluation process. The findings were supplemented by a comprehensive review of published and archival information.

Professional exposure, as a consultant (Appendix 2), to criminal investigations to a substantial number of public services over the last decade has provided me with a valuable insight into the policy, processes and the linguistic and operational culture of these organisations. With a background as a detective officer, crime analyst and manager from the Specialist Operations branches of the Metropolitan Police I had a good understanding of investigative procedures, collaborative working and the demands of legislation to maintain evidential integrity. With this experience, within the police and commerce, I was fortunate and privileged to work with a broad range of investigative staff and intelligence units within the public services listed below.
Child Exploitation and Online Protection Centre (CEOP)
Child Support Agency (CSA)
Criminal Records Bureau (CRB)
Department for Environment, Fisheries and Rural Affairs (DEFRA)
Department for Work and Pensions (DWP) formerly separate entities as the Employment Service, the Benefits Agency and Pension Service (now constituting JobCentre Plus, Pensions Service and the Risk Assurance Division)
Driving Standards Agency (DSA)
Driver and Vehicle Licence Agency (DVLA)
Forensic Science Service (FSS)
HM Revenue and Customs formerly the separate entities of the Inland Revenue and HM Customs & Excise (HMRC)
Identity and Passport Service (IPS) formerly the United Kingdom Passport Service (UKPS)
Ministry of Defence (MoD)
National Health Service (NHS)
Serious Organised Crime Agency (SOCA) formerly the National Crime Squad (NCS) and the National Criminal Intelligence Service (NCIS)

Although previous experience and exposure can be an asset, I was conscious that this could lead to subjective bias, including presumption in designing the methodology; reviewing the results; and interpreting the research findings. To counter this risk a number of safeguards have been observed including the use of content analysis, ‘second rating’, and endeavouring to reach theoretical saturation, to ensure objectivity and reliability in the research process.
Chapter 4: Background and related work

Introduction

Chapter 2 reviewed the origins of intelligence-led policing (ILP); the development of the Kent Police Model and the naissance of the NIM. The model provides a national ILP-based policy and a business process that dominantly positions the collation, analysis and application of intelligence as the central driver for criminal investigation and crime reduction (Home Office, 2004). Having established the evolutionary path of the NIM, this chapter initially reviews the creation of this policy and the potential influences exerted on the NCIS designers through policy transfer or ‘lessons learned’ (Hill, 2009: 180). This is followed by an examination of the description of the NIM, within the Guidance, as a business model.

The NCIS ‘blue book’ (NCIS, 2000), effectively an introduction to the NIM, claimed that it ‘provided clarity and standards for intelligence work’ and enabled the review of ‘intelligence systems and introduce more rigour in the management decision-making process’ (p. 2). More recently, the NPIA (2010) stated that the model ‘takes an intelligence-led, problem solving approach to crime and disorder’ (NCIS 2000: 7). These sources (the emphasis added) concur in identifying the core ingredient of the model as (criminal) intelligence, with the NPIA and NCIS including ‘decision making’ and ‘problem solving’ that was described in Chapter 2 under the auspices of tasking and co-ordination.

To provide context, this chapter will examine the origins of intelligence and draw upon related work for a more focused review of criminal intelligence. This is supplemented with a review of the NIM as an effective crime reduction model (Kirby & McPherson, 2004; Maguire, 2004; Ratcliffe, 2008 and Grampian Police, 2010) and, specifically for public services, its potential impact on fraud. The final part of this chapter provides a review of the NIM implementation from the perspective of organisational change and the potential impact that this may have on public service conformity to the model.
The NIM as a national policy

The entitlement of the NIM to be described as national policy cannot be definitive as Hill (2009; 15) states that “The definitional problems posed by the concept of policy suggest that it is difficult to treat it as a very specific and concrete phenomenon”. However, for the purpose of this review, the model’s entitlement to that term is drawn from a number of sources. Jenkins (1978: 15 cited in Hill, 2009: 15) defines ‘policy’ as “a set of interrelated decisions ... concerning the selection of goals and the means of achieving them within a specified situation ...”. This definition is supported from a business perspective of policy and is described as a, “... set of basic principles and associated guidelines, formulated and enforced by the governing body of an organisation, to direct and limit its actions in pursuit of long-term goals” (Businessdictionary, 2011). This appears to provide a ‘fit’ with the NIM as ‘policy’, in that it relates to ‘intelligence-led decision making’ employing ‘interrelated decisions’, i.e. analytical products; intelligence products; knowledge products; and system products (John & Maguire, 2004: 2). The selected ‘goals’ have been articulated in a variety of forms, including force objectives; the reduction of crime and disorder (NPIA, 2010); and meeting ‘strategic goals’ (John & Maguire, 2004: 58). The NPIA are unequivocal in their determination for the model: “NIM became policy of the Association of Chief Police Officers (ACPO) in 2000” (NPIA, 2009), which delivers the broad police perspective. I would argue that its later adoption by the Home Office; elevation to legislative recognition (s. 2, Police Reform Act 2002); and the imposition for compulsory national adoption by police services, convert this ‘police (ACPO) policy’ to ‘national policy’.

Policy Transfer

Designed within NCIS, the NIM was a refined product ostensibly based upon the precepts of ILP and embodied in the Kent Police Model and recommended to the Home Office for adoption. As described in Chapter 2, the Kent model was introduced in 1993 as a “holistic system of ILP” (Maguire, 2008: 455) and it drew positive attention (HMIC, 1996 and 1997), later described as “the most extensive and influential” ILP project demonstrated in England and Wales (Tilley, 2003: 313). Re-engineered, rebranded and published in 1999, the NIM was strongly sponsored by Phillips, as a representative of ACPO, and recommended to the Home Secretary, Jack Straw, in September 2000. However, the Kent Police Model was not alone in its claim for intelligence-led success at the close of the
millennium. Circumstantial evidence to support policy transfer rests upon a number of factors, the NIM was a different model to the Kent Police Model in that it had “substantially broader scope and ambition” (James, 2011: 124). As Amey et al identified (1996: 33), in its original form the Kent model, only focusing on four ‘crime types’ (robbery, autocrime, burglary and drugs), was not intended to impact upon general crime. As previously mentioned in Chapter 2, unlike the Kent model, the NIM includes the requirement for ‘strategic assessment’. This is described by John & Maguire (2002: 212) as “informed by analysis of problems ... and by priorities imposed ... by internal and external bodies“, arguably influenced by COMPSTAT that, of all the contemporary policies, it exclusively featured this element.

In addition, there was potential for policy transfer during the NIM’s genesis within NCIS and the Home Office, from alternative policing initiatives such as Community Policing; central government performance policy; and the prevailing social environment. There is no direct evidence that these factors impacted upon the model’s transition into national policy, and adoption by the Home Office. However, modification of the Kent model was quite evident and may have provided the Home Office with a convenient and timely opportunity to progress both intelligence-led policing and greater performance accountability. James 2011: 132 notes that an ACPO member suggested that the NIM was an attractive proposition to the Home Office as it was a “rational model that offered a degree of accountability”; whilst Flood’s account confirms that “they [Home Office officials] were looking for some new initiative”.

It was evident that the NIM had a limited gestation period in comparison with ILP, which could be reliably traced back to the Baumber Report of the mid 1970’s (ACPO, 1975) and that it was a modified product from a county policing initiative. This review will include three possible contributors to policy transfer during the NCIS development of the NIM: ‘COMPSTAT’, Community Policing and the New Public Management (NPM). As an introduction, I have included a time line covering a three decade period from 1975 (Table 4.1) to illustrate a schedule of events, initiatives and themes that potentially exerted influence on the design and implementation of the NIM.
<table>
<thead>
<tr>
<th>Year</th>
<th>Initiative, Event or Theme</th>
<th>Source</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>1975</td>
<td>Baumber Report: Report on the Subcommittee on Criminal Intelligence</td>
<td>ACPO, 1975</td>
<td>The introduction of the concept of ILP and recommendations for the more systematic use and application of criminal intelligence for all of the police service and a clear differentiation was made between ‘information’ and useable ‘intelligence’.</td>
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<td>1977</td>
<td>ILP introduced to the Metropolitan Police</td>
<td>Mark, 1978</td>
<td>Limited implementation, resulting in “a comparatively small number of handpicked men and women to specialise in intelligence gathering and surveillance” (Mark, 1978: 294)</td>
</tr>
<tr>
<td>1978</td>
<td>Pearce Report: 3rd Report of the Working Party on a Structure of Criminal Intelligence above Force Level</td>
<td>ACPO, 1978</td>
<td>The Pearce report drew a broad distinction, in terms of content, between criminal intelligence records and criminal records (Maguire &amp; John, 1995). “For working purposes we therefore define criminal intelligence records as containing inferential and speculative matters about criminals and crime that do not form part of the criminal record. It does not preclude the inclusion of some criminal record information such as summaries of convictions where it would be helpful, but we would expect this to be minimal and duplication is to be avoided so far as practicable” (ACPO, 1978: para. 7).</td>
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<tr>
<td>1979</td>
<td>Problem Oriented Policing</td>
<td>Goldstein, 1979; 1990</td>
<td>Problem oriented policing entails more than identifying and analysing community problems and developing more effective responses to them, “…in its broadest context it is a whole new way of thinking about policing that has implications for every aspect of the police organization its personnel and its operations With an ever present concern about the end product of policing as its central theme it seeks to tie together the many elements involved in effecting change in the police … changes are coordinated and mutually supportive It connects with the current move to redefine relationships between the police and the community. (Goldstein, 1979: 3).</td>
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<tr>
<td>1981</td>
<td>Community Policing</td>
<td>Scarman, 1981; Friedman, 1996; Rowe, 2008 and Mackenzie &amp; Henry, 2009</td>
<td>Rowe (2008: 154), argues that it was the Scarman Inquiry and subsequent report (1981) on the Brixton disorders that renewed and established the Community Policing agenda. Friedman’s (1996: 115) definition for Community Policing is a “policy and a strategy aimed at achieving more effective and efficient crime control, reduced fear of crime, improved quality of life, improved police services and police legitimacy, through a proactive reliance on community resources that seeks to change crime causing conditions. This assumes a need for greater accountability of police, greater public share in decision making, and greater concern for civil rights and liberties”.</td>
</tr>
<tr>
<td>1982</td>
<td>Zero Tolerance Policing</td>
<td>Kelling &amp; Wilson, 1982; Kelling, 1988; Kelling &amp; Coles, 1998</td>
<td>Marshall (1999: 2) suggests that there is no consensus on an exact meaning of the term and it refers to a number of concepts including ‘being tough on crime’; ‘strict non-discretionary law enforcement’; and ‘police action against minor offences and disorder’. Bratton (1997: 34) described it as ‘strategic re-engineering’ of the New York Police Department including strict crime control; decentralised policing with accountability; use of timely and accurate intelligence data, trust; and emphasis on quality of life crimes.</td>
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Table 4.1 Time Line (1975-2006): Development and potential policy transfer to the NIM
<table>
<thead>
<tr>
<th>Year</th>
<th>Event/Innovation</th>
<th>Source</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1986</td>
<td>Ratcliffe Report: Report on the Working Party on Operational Intelligence</td>
<td>ACPO, 1986</td>
<td>Designated staff appeared under-trained and the few Intelligence Units that existed appeared ill-equipped and without clear focus and purpose. Ratcliffe reported and emphasised the need to co-ordinate intelligence gathering, better use and application of intelligence products, directing operational activity and guided resource allocation to stimulate ILP (ACPO, 1986)</td>
</tr>
<tr>
<td>1991</td>
<td>SID launch (MPS)</td>
<td>HMIC 1997; Grieve, 2004</td>
<td>The Systems for Investigation and Detection project identifying commonality of procedures, staffing, roles and integrated levels of activity (Grieve, 2004: 33). Recognised as local best practice it introduced targeted proactive working, senior ownership of intelligence, communicated intelligence strategies, tasking and co-ordination and partnership.</td>
</tr>
<tr>
<td>1993</td>
<td>Kent Policing Model initiated</td>
<td>HMIC, 1995; Flood, 2004 and Phillips 2006; Maguire, 2008</td>
<td>Described as “an intelligence-led proactive problem solving approach to policing with crime reduction as its primary objective” (HMIC, 1995:1). David Phillips, the Chief Constable of Kent Police, ably assisted by Brian Flood, introduced the KPM as a “significant deviation to traditional policing methods and to employ a holistic system of ILP” (Maguire, 2008: 455)</td>
</tr>
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</table>
| 1994 | COMPSTAT introduced to the Transit police in New York, USA | Bratton, 1998; Dussalt, 1999 | The originator of COMPSTAT (COMSTAT) was Maple and in interview (Dussault, 1999) he defined four fundamental principles:  
- Accurate, timely intelligence clearly communicated to all.  
- A rapid deployment that is concentrated, synchronized and focused.  
- Effective tactics and strategies.  
- Relentless follow-up and assessment.  
Referred to as ‘COMSTAT’ or ‘Charts of the Future’ by its originator Jack Maple it was introduced to the New York Police Department in 1994 by Police Chief Bratton |
| 1996 | Performance review on Kent Police by HMIC | HMIC, 1996 and 1997 | Reported: the Kent Policing Model (KPM) has generated a greater appreciation amongst officers of the concept and ethos of crime reduction, and the component parts of the model appear to be more cohesive (HMIC, 1997: 2)  
The major benefits of the KPM include:  
- a control on demands for policing services by assessing calls from the public and by providing the most appropriate response;  
- the development and utilisation of criminal intelligence to ensure that resources are most effectively directed; and  
- the establishment and development of specialist teams to deal with intelligence, crime scenes, crime recording, victim care and interviewing (HMIC, 1996: 2.19: 8) |
1997 | Policing with Intelligence: HMIC Thematic Inspection Report | HMIC, 1997 | Refers to The Audit Commission, working with ACPO, HMIC and others publishing two papers, emphasising the primary importance of intelligence led policing. (1.19: 5). Recommends: formal tasking criteria; National Informant Database; and measure performance in respect of the crime intelligence functions (6.6: 35).

1999 | NCIS releases the “Blue Book” | NCIS, 2000 | The initial publication on the NIM.


2001 | National roll out of NIM in England and Wales | John & Maguire, 2004 | Following the publication of the NCIS ‘Blue Book’, police forces began to voluntarily adopt aspects of the NIM. John & Maguire’s report followed a 21 month study of ‘early experiences’ of implementation on the NIM focused on the three ‘development sites’, but acknowledging that other forces had begun their implementation.

2002 | The NIM receives legislative recognition | s.2 Police Reform Act, 2002 | Compulsory imposition of the NIM and its Code of Practice through legislation, codified - under section 39A of the Police Act 1996, as inserted by Section 2 of the Police Reform Act 2002. Compliance is subject to audit and inspection by the HMIC.

2003 | The NIM is included in the first National Policing Plan (NPP) for 2003-2006 | Community Justice Portal, 2010 | Introduced by the Home Secretary, David Blunkett, it included the requirement for all police services in England and Wales to implement the NIM, stating that “Chief officers must have regard to the code and ensure that their forces adopt the practices of NIM and implement the required minimum standards”

2005 | Guidance on the NIM published | ACPO/Centrex, 2005 | This published manual constitutes 213 pages and provides a comprehensive description of the model, Code of Practice (pps. 99-109) and the minimum standards (pps. 111-159)

* * *
DWP, IPS and DSA adopt the NIM

* * * Internal documents (GPMS)

The three public services under review ‘adopt’ the NIM to support their investigation and fraud reduction.

2006 | Guidance on the NIM published in Scotland | ACPOS/Centrex, 2006 | In Scotland there is no legal backing to the implementation of the implementation of the NIM, however, ACPOS acknowledges the Code of Practice as written by ACPO (ACPOS/Centrex, 2006: 8)

Policy Transfer: COMPSTAT
Potentially the strongest competing ‘intelligence-led model’ of topical interest to the police at the end of the last century was not ‘home-grown’, but a trans-Atlantic import ‘COMPSTAT’ originated by Jack Maple in 1994 under the aegis of Bratton (Dussault, 1999) and later introduced to the New York City Police. Both the NIM and COMPSTAT are jointly described as “intelligence models to enable strategic management and the
timely direction of resources to crime” (Ministry of Justice, 2005). Loveday (2005) reported that COMPSTAT received substantial popular interest and support in the UK generated through enthusiastic media reporting of its adoption and subsequent crime reduction in association with the ‘zero tolerance’ initiative by the New York City Police (NYCP). Within the UK police service, a number of prominent senior police managers provided a qualified interest in the adoption of COMPSTAT (Hayes, 1998; Griffiths, 1997), but the support was not unanimous, particularly when the full extent of accountability and sanction became evident. Bratton (1998), the Commissioner of New York City Police, argued that, for the COMPSTAT element to be successful, it demanded internal accountability with Precinct (BCU equivalents) Commanders attending weekly organisational (Force equivalent) Crime Control Meetings to report their results. These gatherings, colloquially known as ‘blood-lettings’, were executed in a ‘data [intelligence] saturated environment’ (Weisburd et al, 2001 and 2004) and similar to the NIM tasking and co-ordinating mechanism and processes. The COMPSTAT process incorporated a ‘zero tolerance’ ethos, delivered significant results extending beyond the community environment with dramatic, and independently corroborated, reductions in recorded crime. However, compliance and ‘delivery’ was ruthlessly imposed and monitored by Bratton who, over the 18 month period its trial and implementation, transferred over 30% of his Precinct Commanders and dismissed four of his five ‘superchiefs’ (Maple, 1999: 136).

It appears possible, although circumstantial, that COMPSTAT exerted influence on the design of the NIM, if only through the addition of a ‘strategic element’. However, it should be acknowledged that the SID project, launched in 1991 within the MPS, had also promoted the need for published communicated intelligence strategies and other attributes ultimately featuring in the NIM, viz. tasking and co-ordination (Grieve, 2004: 33). The Kent Policing Model contained no ‘strategic element’ and this element was appended to the NIM whilst under development at NCIS. On its arrival at the Home Office, the NIM caused some uncertainty as to where to place the model and it is likely that more familiar parallels in policing initiatives were sought, if only to place this ‘NCIS creation’ into perspective. Initially, for review and development, it was deposited with the Organised Crime Portfolio and then moved to the Crime Reduction Directorate. At one stage it was held by two separate departments and following discussions with ACPO it was again transferred, this time (Spring 2002) to the Policing Policy Unit (James, 2011: 132). As previously mentioned, Ratcliffe (2008: 273) closely associates the NIM with intelligence-
led policing, arguing that: “…almost impossible to discuss the concept of intelligence-led policing without making reference to the National Intelligence Model (NIM)”. He pursues this point by stating that: ILP and the NIM is “… philosophically closest to problem-oriented policing, and to a degree the accountability mechanism of CompStat”.

I would argue that attributes of COMPSTAT influenced the design of the Kent Police Model and, being familiar to Phillips, ACPO and to NCIS, influenced the design of the NIM. In addition, I would assert that the doctrines associated with COMPSTAT exerted some influence on the architects of the model and the developers within the Home Office, as both are intended to “deliver the tight and targeted management of resources based upon processed information and intelligence”. (Stelfox, 2007; Tilley, 2008).

Policy transfer: Community Policing:

Community policing is not a new concept and in some respects, it has the oldest provenance of its contemporary rivals, viz. Team Policing, Unit Beat Policing, Policing by Objective, Sector Policing, ILP, Problem Oriented Policing, Zero-Tolerance and COMPSTAT. Emsley (2007: 235) suggested that although the concept of community policing was articulated towards the end of the twentieth century it is much older, “…the ideas and practices that are brought together within the concept have run through the history of policing”. By the end of the 1970’s Community Policing was recovering as a workable concept with police managers (Mackenzie and Henry, 2009: 9) and was characterised as the ‘new orthodoxy’ (Eck and Rosenbaum, 1994: 3). The term appears to feature under a number of alternative banners, i.e. ‘neighbourhood policing’, ‘community partnership’ and ‘community engagement’ (Rix et al, 2009: 9) and this may be partially due to its lack of clear definition, or as a convenience.

Despite its ‘history’, a clear definition of community policing remained elusive, according to Friedman in 1992, there was no definition available in literature. Tilley (2003: 315) stated that following a comprehensive review “community policing is widely endorsed though at the same time widely seen to be close to meaningless”. Rowe (2008: 72) suggested that its definition may ‘often appear vague and more than a little aspirational’ and for contemporary policing, the closest to a definition were two sets of ten principles, the first provided by Alderson (1979) and the second, over a decade later, by Trojanowicz and Bucqueroux (1990). Friedman (1992: 4) described these as: “Alderson’s ten principles
related to policing under conditions of freedom with emphasis on guaranteeing personal freedom and free passage while the principles offered by Trojanowicz and Bucqueroux have more to do with the implementation of the concept in a given police force”. For the purpose of this research I have adopted Friedman’s (1996: 115) definition for community policing as a “policy and a strategy aimed at achieving more effective and efficient crime control, reduced fear of crime, improved quality of life, improved police services and police legitimacy, through a proactive reliance on community resources that seeks to change crime causing conditions”.

The ethereal and potentially ambiguous meaning of the term has not precluded it from continuing to be widely used, although its generous application (referring to a broad range of police-public relationships and partnerships) may have contributed to its devaluation and, to some writers, making the term almost meaningless (Manning, 1984: 211; Bayley, 1994: 104; Tilley, 2008: 376-377). However, this view is not unanimous and Williamson (2005: 153) described Community Policing as the ‘preferred policing style’ and Brogan and Nijjar (2005: 1) state that it remains the ‘buzzword in Anglo-American policing for the last two decades’. Furthermore, it continues to be the subject of current Home Office review (Rix et al, 2009; Mason 2009) and a popular topic with contemporary researchers and writers on police practice (Innes et al, 2009; Peak & Glensor, 2011).

For this research it is the level of both popularity and familiarity that Community Policing experienced during the transitional design of the Kent Police Model to the NIM that provides its potential qualification as an ‘influencer’ through policy transfer. The identifiable differences between the NIM and the Kent model suggest revision and modification to the KPM by the NCIS authors, potentially influenced by ACPO. Intelligence-led policing and the Kent model were exclusively the preserve of the police and, in themselves they did not allude to an intelligence-led investigation model for comprehensive adoption and application beyond the confines of law enforcement agencies. Neither ILP nor the Kent model precluded ‘joint working’ or partnership, but their profile, processes and products were potentially more insular and intended to deliver against the broad demands of policing. Community Policing requires broader engagement (Rix et al, 2009) than the Kent model extending to social initiatives such as ‘Neighbourhood Watch’ and, in the continuing drive for intelligence-led investigation and decision making, demand broader access to data and information. This implicitly requires working collaboration
with society, public service communities and commerce to enable “more efficient and effective crime control ….through a proactive reliance on community resources” (Friedman, 1996: 115).

Recognition that the police could not, in isolation, address increasing crime and disorder problems was clearly acknowledged by central government in The Crime and Disorder Act 1998 (CDA). This legislation established ‘statutory partnership’ between the police and civilian authorities. The compulsory partnership engaged with the 376 local authorities and instigated the creation of Crime and Disorder Reduction Partnerships (CDRP) and could be viewed as ‘Phase 1’ of greater community engagement and collaboration. The CDRPs are required to carry out and publish crime and disorder audits, strategies and targets; consult with the local community required. The CDA delivered new powers to the local authorities and the police and requirements to develop multi-agency and community-based strategic partnerships to reduce crime and disorder in their locality with the implicit expectation that the NIM would support this joint working. However, this did not demand compulsory engagement with the broader investigative community in other public services and commerce. The revision of the Kent Policing Model and inclusion of the following statement within the NIM Code of Practice: “The National Intelligence Model is not confined to, or restricted for specialist usage. It is relevant to all areas of law enforcement; crime and its investigation, disorder and community safety.” (Home Office, 2002; para. 3.1.3) could be viewed as ‘Phase 2’ of a government initiative to increase the consistency of intelligence-led investigative process across the national investigative community and thus facilitate greater collaborative working. Although not conclusive as, policy transfer; “lesson drawing” (James & Lodge, 2003: 179) or the “migration of ideas as a driver of policy change” (Hill, 2009: 180), the NCIS design team formulating the NIM were familiar with the themes and practices of Community Policing albeit they operated in a service that focused on serious and organised crime. The Kent Policing Model was designed and implemented for parochial (county) application and clearly featured a police-specific profile. There is no suggestion that it was devoid of Community Policing considerations rather, I would argue, that this element was fortified in the design of the NIM, thereby addressing a perceived popularity for increased partnership within central government (The Scottish Government, 2010). In comparison with the Kent model, the NIM was intended to attract a more general appeal; broader application; and compliance that required direct engagement with both society and the general investigative community. In this respect the
‘Guidance’ (ACPO, 2005) was composed to include an abundance of references to ‘community’: co-operation, engagement, information and partnership as can be seen from the references below – the emphasis has been added (the list is selective, not exhaustive).

*NIM* promotes a cooperative approach to policing and many of the solutions to problems will require the participation of other agencies and bodies. It is further strengthened when used in conjunction with other partner agencies, e.g., joint tasking and co-ordination processes, and when it incorporates community information into the strategic assessment (p.12).

Law enforcement relies on intelligence from local officers and the identification of problems through community engagement (p. 35).

Community information can come to the police from members of the public and through partner agencies (p. 33)

Community and partnership activities and meetings (p. 47)

information management: indicates a problematic neighbourhood, tensions or problems within a community group or a signal crime (Section 6.3: 50)

Access to external sources of information through partnership arrangements can provide: community intelligence and community impact assessments (p. 59)

NIM tasking and co-ordination processes link with community partnership (Section 9: 74)

The intelligence requirement may involve changes being made to community policing (p. 77)

Neighbourhood policing uses NIM to manage activity (p. 83)

effective working relations between the police, partner agencies and the community . (p. 89)

Policy Transfer: New Public Management

Levy (2010: 234) argued that the performance culture has been the “dominant paradigm in public administration for at least 20 years” and this would support the potential influence of New Public Management on the architects and developers of the NIM. Added to this, the key sponsors of the NIM (Phillips and factions within ACPO) would have been aware that to achieve Home Office endorsement (and national adoption) a ‘performance management’ ingredient would provide an attractive incentive. Again, policy transfer relies upon circumstantial evidence although Pidd, (2008: 58-59) argues that the NIM was
exploited as part of a consolidating drive, by the Home Office, to expand the New Public Management initiative within the police service. Value for money, management by objective and the prioritised application of resources all typified the Conservative Government’s ‘Fiscal Management Initiative’ (FMI, 1982), which evolved into New Public Management, intending to encourage better financial and resource management by introducing commercial practices into the public services. Savage (2007: 212-3) argues that the performance culture imposed upon the police, in response to FMI and New Public Management, can broadly be identified in three phases: economy and efficiency (1980s); effectiveness (1990s); and results and delivery (under the New Labour regime) and these epochs are adopted in this short review.

Policy transfer: NPM - The 80s, ‘Economy and Efficiency’

The police were quickly included within the trawl of ‘targeted’ public services by the Home Office Circular 114 (1983), which encouraged the application of the New Public Management (Burrows & Lewis, 1988). Although not compulsory, HO Circular (114/1983) was quickly adopted as “as a seminal text that influenced the thoughts and actions of police leaders” (ACPO, 2008: 23). In some quarters it stimulated annual planning cycles; policing by objective; the “Three E’s” of efficiency, effectiveness and economy; and what Brooks (2010: 1) described as “the notion of what gets measured, gets done”.

The police response, and an inevitable product of 114/83, was to focus activity onto specified local objectives. However, Weatheritt’s (1993) research identified that the objectives were “often formulated on the basis of poor, irrelevant or incomplete information”. This indicated that FMI/New Public Management, in the guise of the HO Circular 114/83 did not act as a spur for the increased efficiency and accountability. Rather it tended to promote traditional methods, appearing to act more as a retardant, diverting energy and resources away from the introduction of progressive, and potentially more effective, initiatives. What HO Circular 114/83 failed to provide in the 1980’s was a structure, it was not modularised, directive or accompanied with standards as in the case of the NIM, it did not ‘translate the fundamental principles’ (Skogan, 2008: 26) and permitted discretionary implementation. The bounty of 114/83 was police diversity of practice and Leishman et al (1995: 26) argued that the police service were almost unique in the public sector in its resistance to New Public Management. This resistance coincided in
the late 1980s with a “concerted drive from central government … to introduce efficiency measures and heightened financial accountability into the public sector in pursuit of value for money” (Walsh, 1995: 178).

Policy transfer: NPM - The 90s, ‘Effectiveness’: Audit and Inspection

The 1990s witnessed police forces progressing and adopting more proactive methods of crime management, in some cases stimulated by the National Audit Commission’s (1993) report ‘Helping with Enquiries – Tackling Crime Effectively’. This ultimately resulted in a number of experiments and initiatives including intelligence-led policing as in the Kent Policing Model (John & Maguire, 2007: 210), although Savage (2007) suggested that the full arrival of ILP coincided with the establishment of the NIM. Innes & Sheptycki (2004: 22) suggested that the increased demands placed upon policing to be more accountable and “cost effective”, motivated this shift away from traditional methods “… the new practices of ILP (and the NIM) have contributed to these shifts”. However, standardisation and consistency between forces together with increased “efficiency and accountability” still appeared elusive to the Home Office and HMIC (1997: 34-35 recommendations to improve intelligence work in the UK). Scott (1998: 270) argued that the very expansion of a performance culture can drive police from the ‘hard-to-quantify areas’ such as community policing and crime prevention to simply concentrate on whatever they are being measured against. Measurement took two forms, centrally imposed targets and an inspection regime. HMIC inspections had been relatively informal, “little concerned with testing scrutiny”; that was to change with the arrival of New Public Management, effectively shifting the inspection process from “ritual to one of enforcement”’ (Savage, 2007: 96). Added to this, the HMIC increased its power and impact in a number of ways, firstly by undertaking thematic inspections - in-depth scrutiny - as well as annual inspections (Reiner, 2000). Secondly, by publishing all its reports – effectively ensuring that recalcitrants were ‘named and shamed’ as well as circulating good practice; and finally by re-stocking it ranks with qualified staff, including civilian experts in areas of finance and human resources. Through these inspections and subsequent reports, the police were encouraged to review and identify processes and procedures to meet their policing objectives.
Selective legislation has imposed elements of performance management on the police, together with tighter controls by central government delivered through the Police & Magistrates Court Act 1994 (PMCA) and the Regulation of Investigatory Powers Act, 2000. The PMCA effectively empowered the Home Secretary to introduce mandatory annual objectives and performance indicators (targets) on the police. In response, forces were required to generate and publish annual policing plans that, effectively, held Chief Officers to account (Jones & Newburn, 1997; 2002, 129-146). Initially, Jones, Newburn and Smith (1994) stated that the constitutional framework established by the PMCA only had a superficial and indirect effect on UK policing, arguing that the due process model was “hopelessly inadequate” and that the revised regulations were “frequently ignored and could even be counterproductive” (Jones et al, 1994: 5). Conversely, Newburn (2003: 94) suggested that the PMCA heralded “a new era of policing, emphasising crime control”, thus effectively laying the foundation for legislative adoption of the NIM within a broader policing context. More recently, Reiner (2010) defended the PMCA as a first step in ensuring police accountability and one of the more successful NPM inspired practices. The level of meaningful and lasting change to police effectiveness and the direct impact of the PMCA on investigative practices or culture remain debatable. The reason for some inertia within the police reported by Jones et al (1994: 5), at least within centralised units, may be supported by Skogan (2008: 27) who, citing his research with the US police, suggested that officers (particularly in elite units) were able to resist most changes that were attempted to be enforced by “avoidance strategies”.

Whereas the PMCA had a direct impact upon the police and local authorities, the Regulation of Investigatory Powers Act, 2000 (RIPA) had wider significance on the use of a broad range of powers for all government agencies and in particular the DWP (then the Benefits Agency). The Regulation of Investigatory Powers Act was introduced by Parliament in 2000, setting out the reasons and authorities for the use of directed covert surveillance and covert human intelligence sources (CHIS). The legislation created a regulatory framework to govern the way public authorities use these techniques. The Home Office (2009) consultation paper stated:
...under RIPA, the most deeply intrusive techniques, such as intercepting communications or eavesdropping in private places, can only be used by a very limited set of public authorities. ...they must first be satisfied that it would be necessary and proportionate to do so. ... the impact of these techniques on the privacy of those under investigation, and on any other people who might be affected. Different techniques can only be used if they are authorised at appropriately senior levels; and the most deeply intrusive techniques are subject to prior independent approval.

The Home Office (2009: 3) consultation paper suggested that for many years, public authorities, including the law enforcement and intelligence agencies, various regulatory bodies, and local authorities, had used a wide range of covert investigatory techniques to investigate suspects without alerting them to the fact that they are under investigation. Until 2000, when the Human Rights Act 1998 came into force and the Government passed the Regulation of Investigatory Powers Act 2000 (RIPA), public authorities could use most of these techniques free from statutory control. Such agencies were not always required to consider the necessity or proportionality of using these techniques, nor were they required to justify the intrusion into the privacy of those under investigation. The use of covert investigatory powers and practices by government agencies were largely unregulated, being only selectively subject to higher level authority; in many cases not prone to independent oversight; and with no independent complaints mechanism (Home Office, 2009).

The legislation has courted some controversy, stimulating public criticism of the use of surveillance by some Local Authority enforcement officers and investigators and concerns regarding the potentially trivial nature of some of the ‘crimes’ being investigated. Misuse of covert investigation powers by non-police authorities has prompted government reflection and public consultation about whether such authorities should remain invested with such powers (Harfield, 2009: 103). These concerns led to a review of the legislation in 2009, leading to revised legislation - the Regulation of Investigatory Powers (Directed Surveillance and Covert Human Intelligence Sources) Order 2010. In addition to defining the circumstances when these investigation methods may be used, the Act also directs how applications will be made and how, and by whom, they may be approved, reviewed, renewed, cancelled and retained. The Act must be considered in tandem with associated legislation including the Human Rights Act (HRA), and the Data Protection Act (DPA).
It provided restrictions on public services, limiting the engagement of powers under RIPA when performing ‘core functions’. For example, an agency may rely on the Act when conducting a criminal investigation as that would be considered a ‘core function’, whereas the disciplining of an employee would be considered a ‘non-core’ or ‘ordinary’ function. Examples of when public services may use RIPA and CHIS are as follows:

Trading standards – action against loan sharks, rogue traders, consumer scams, deceptive advertising, counterfeit goods, unsafe toys and electrical goods;
Enforcement of anti-social behaviour orders and legislation relating to unlawful child labour;
Housing/planning – interventions to stop and make remedial action against unregulated and unsafe buildings, breaches of preservation orders, cases of landlord harassment;
Benefits fraud – investigating ‘living together’ and ‘working whilst in receipt of benefit’ allegations and council tax evasion; and
Environment protection – action to stop large-scale waste dumping, the sale of unfit food and illegal ‘raves’.

Public authorities using techniques under RIPA are now subject to independent inspection. Finally, there is an independent tribunal, the Investigatory Powers Tribunal, to consider any complaints relating to the way investigatory techniques regulated by RIPA have been used. It prescribed that Local Authorities’ use of these investigation methods were restricted in nature and should only be used for the prevention and detection of crime or the prevention of disorder. Local Authorities are not able to use intrusive surveillance (Thurrock, 2011).

The examples do not replace the key principles of necessity and proportionality or the advice and guidance available from the relevant oversight Commissioners. The RIPA (Communications Data) order came into force in 2004. It allows Local Authorities to acquire communications data, namely service data and subscriber details for limited purposes. This order was updated by the Regulation of Investigatory Powers Communications Data) Order 2010 (Thurrock, 2011: pps. 3, 4, 13).

Policy transfer: NPM - motive for the NIM; New Labour
Potentially, I would argue that the opportunity presented by the NIM, already popular with ACPO, offered the Home Office a highly attractive customised and structured mechanism to impose further ‘efficiency’; standardisation and accountability into the police. It may
also have signalled a future advantage in that, if made compulsory through legislation, it would provide the government with an established inspection regime to ensure police compliance. This occurred with the mandatorily introduction to the police through the Police Reform Act, 2002, providing additional stimulus for the New Public Management performance initiative, to ‘drive up’ performance through the consistent use of an ‘approved’ business model. This view is broadly supported by Savage (2007: 117) who argues that the NIM reflects New Public Management in at least two senses; it provides a “national standards framework” designed specifically to impact upon performance and, in description, “it is explicitly a business model”. However, this should be qualified, the NIM only provides a framework for intelligence-led investigation and decision making, although the ‘Guidance’ broadens the claim to: “NIM is the core business model for policing” (ACPO 2005: 9) and infers that it is not limited in that “NIM is an intelligent means of conducting police business” (ACPO 2005: 11). The Select Committee on Welsh Affairs clearly linked the model to performance stating that the NIM was: “a further tool for identifying targets and priorities in the local context is the National Intelligence Model” (Parliament.uk, 2005). Perhaps the firmest ‘link’ of the NIM to performance is provided by the NPIA (2008):

For many team leaders the structures that serve the National Intelligence Model (NIM) process such as Tactical Tasking & Coordination meetings .... may be the only formal opportunity to discuss performance, hold people to account and decide on follow-up action. These processes could therefore be considered as part of, or strongly related to, the performance management framework as they have an important role in the process of setting operational priorities, tasking resources and monitoring delivery through results analysis (NPIA, 2008: 18).

Hough, (2006) also supports the NIM as a New Public Management initiative, arguing “some policing initiatives have compounded the effect of NPM” and that the NIM, as a set of “business processes”, has compounded the paradigm, “locking the police more tightly into crime fighting goals”. This latter assertion is borne out by Foster (2003: 212) who suggested that the “management culture within the police was similar to the boardroom”. In addition, the NIM has continued to expand its impact on policing activity through the publication of tighter guidance (see the list on page 168), potentially extending beyond the parameters of New Public Management and managerialisation (McLaughlin, 2007: 96). In this respect, the imposition of NIM and an expansion of the performance culture have provided significant impact on police management activity.
NIM as a business model

According to Alan Buck, the Chairman of the Superintendent’s Association Crime Advisory Committee, the NIM was originally intended, solely, for intelligence purposes (IntelligenceAnalysis.net, 2009). However, this view may be flawed as the Home Office were apparently convinced that the NIM could operate as a business model. As previously discussed, the model may have offered additional appeal by providing an opportunity to expand the performance culture within the police by supporting the elevation of the Kent ILP-based decision making process to a business model. This was a view endorsed by interview with an ACPO officer (RS02) who suggested that the NIM, is exclusively an intelligence process – not a business model. Although designed within NCIS and sponsored by ACPO, the Home Office may have perceived added advantages to imposing such a business model on the police as indicated by the following statement:

*It is important to note that the NIM is NOT just about crime and NOT just about intelligence – it is a model that can be used for most areas of policing .... The NIM is primarily a business model for use in allocating resources* (Home Office, 2007).

Furthermore, in the ‘Guidance on the National Intelligence Model’ (ACPO, 2005: 9) ACPO may have supported this broader application of the NIM beyond an ILP process tool stating that: “NIM is a business model for law enforcement” (p. 8) and “NIM is the core business model for policing …”. In addition, the guide states: “NIM is like any other business model in that it requires products to have practical application” (p. 59). Even contemporary writers support the notion “[the NIM] is in essence a business model” (Maguire, 2003: 38); whilst Ratcliffe (2008: 273) states: “While the National Intelligence Model is not entirely synonymous with intelligence-led policing, the NIM has been adopted as a business model”.

A definitive description of a business model continues to be elusive (Shafer, Smith and Linder, 2004), and Debelak (2006: 3) argues that there is “... no single accepted definition of a business model has appeared”. However certain ingredients appear to be necessary relating to the intended outcome of a business model and, selectively, these include: “deliver value to customers … provide for customer satisfaction” and “fund the business” (Debelak, 2006: 4). In the final ingredient, the NIM may not meet the full criteria as a business model from a commercial perspective. Morris et al (2005) suggest that, even at a
rudimentary level, it should be defined in terms of an “economic model, acknowledging both fiscal cost and benefit”. This is further supported by: “the model includes the components and functions of the business, as well as the revenues it generates and the expenses it incurs” (Investopedia, 2010). This view is broadly supported in that ontologies for business models are intended to validate the underlying rationale of the business providing conceptualisation and formulation of the essential components into elements, relationships vocabulary and semantics (Osterwalder, 2004). In addition, the critical ingredients or variables that should be included are: consumers, customers, allies (partners), suppliers, flows of product, information and money (Weille and Vitale, 2001: 128).

Two further alternative definitions of ‘business models’ worthy of consideration are: “a description of means and methods an organisation employs to earn the revenue projected in its plans” (Business Dictionary, 2007); and “a description of the operations of a business including the components of the business, the functions of the business, and the revenues, and expenses that the business generates” (Investorwords, 2006). Both of these suggest that the business model must include a plurality of ‘means and methods’ or ‘components and functions’ – potentially excluding the NIM, as a business model, with limited influence focusing on the intelligence handling, investigation and tasking process.

The term business model is often used ‘from theory, meaning that the model’s components and their interrelations with the whole business can be relatively obscure’ (Hedman & Kalling, 2003). As explained by Porter (2001: 65): “the term [business model] to describe key components of a given business for empirical use has been criticised for being unclear, superficial and not theoretically grounded”. This suggests that, at the very least, the description of the NIM as a business model may be unsafe or misleading, but not necessarily incorrect. From this initial review it appears that the NIM may be a business model indirectly ‘providing value to customers’ (Debelak, 2006) through improved intelligence-led decision making and resource allocation. However in excluding fiscal cost and benefit considerations (Morris et al, 2005) an alternative title for the NIM, such as a ‘business process’, may have been a more accurate description and it is defined and referred to as such in its own ‘Guidance’ (ACPO, 2005: 8, 9, 11, 14, 15, etc.).

However, Zott, et al, (2010: 25) argue that the business model is a new unit of analysis, “a system level concept, centred on activities and focusing on value” and do not emphasise
the fiscal element. Treece (2010) concurs stating that the contemporary viewing a "...business model as an activity system" and stating that as it "remains theoretically underdeveloped" (Treece, 2010: 12). This would suggest that the common themes identified within these definitions of ‘business model’ definitions (Zott et al, 2010 and Treece, 2010) may engage with any single aspect of costs and revenue, or process. As such, even as a description of a ‘process’, the NIM – without direct costing or overt fiscal accounting - could reliably be described as a business model.

I would argue that the NIM would hold greater attraction to the broader investigation community if it was been described as an intelligence process and thus resisting too close an association with the commercial sector. As Carson (2007: 408-9) reminds us, ‘price tags’ or ‘budgets’ often offends popular sensibilities regarding crime reduction, indeed the media often represent that the cost of policing (particularly of serious crime) as not a serious consideration. Even the Audit Commission although identifying substantial wastage in the Criminal Justice System, appears not to consider the cost of investigations (the substantial majority) that do not reach court. However, the NIM to justify the term ‘business model’ (or business process) should deliver benefit – simple consistency, as a sole product, cannot deliver justification if the benefit quotients or factors are not evident.

There remains the unresolved question as to which agency or department determined and ascribed the epithet of ‘business model’ onto the NIM (was it NCIS, ACPO or the Home Office) and what was the motive – if any? Perhaps Magretta (2002) has captured the reason in that she suggests the term ‘business model’ was one of the great ‘buzzwords’ of the Internet boom, routinely invoked “to glorify all manner of half-baked plans”. She acknowledges that properly constructed and applied such a model can provide substantial benefit to an enterprise provided it “focuses attention on how all of the elements of a [business] system fit into a working whole” (Margretta, 2002: 6). However, this is marginally countered by McPherson and Kirby (2004: 23) defending the term in their claim that: “The NIM is a business model that not only enables police forces to work together with a common level of understanding but also greatly assists a problem solving approach.”. Furthermore, they suggest that the NIM provides a common language, standard systems and operating procedures and delivery encouraging ‘clear ownership and accountability’ (McPherson and Kirby, 2004). These statements hold some validity with regards to NIM now being a nationally imposed process on the police and subject to a
single code of practice; but this does not guarantee ‘consistency’. As for the “commonality of language” this research argues that this claim appears to be aspirational and idealistic, as any such ‘commonality’ should extend to all investigative partners (potential users), whereas the language employed within the model appears to be heavily weighted towards the requirements of volume crime and policing.

The origins of intelligence
The collection and employment of intelligence is not a new concept, neither has it been a specific preserve of the police and criminal investigators. It has its roots in history and was employed, albeit in a non-standard and relatively rudimentary form, before the inception of criminal investigation departments and substantially predating the origins of the British police service. Writers on the history of the collection and exploitation of intelligence cite examples such as Sun Tzu (6th Century BCE) for military purposes (Grieves, 2004); Walsingham (c.1532 – 1590) for national security (Wilson, 2007); and Machiavelli (1469-1527) for political ends (John and Maguire, 2007: 199). To focus on just one, Francis Walsingham actively recruited informants, thus harvesting and collating intelligence to direct investigations regarding ‘state security’. When writing to Cecil in 1568 he stated: “... by weighing the current protestations of the credibility of the party it comes from [the informant], the nature of the matter is of the greatest importance” (Hutchinson, 2007: 36). It was evident that he was seeking to justify ‘value’ in intelligence by testing both its veracity and the integrity of the source – potentially the foundation of both the 4x4, and evolved 5x5x5, evaluation system (see Appendix 5). However, the standardised use of criminal intelligence and crime intelligence (as opposed to intelligence predominantly for military, political and national security purposes) can be reliably traced to 17th century France.

The first Prefect of Police, Lt General Reynie, appointed in 1667 and occupying this role for nearly thirty years, set up extensive monitoring and surveillance on the Parisian population, amassing a substantial network of informants and establishing an impressive archive of information and intelligence (Heuillet, 2001; University Francais, 2010). This process was maintained and slowly evolved, being emulated within other European capitals, however France remained at the forefront of the active acquisition and use of criminal and ‘national security’ intelligence. By the 1820s Vidocq, as head of the Paris Surete, adopted an intelligence model that included a sophisticated system of surveillance
and intelligence gathering on suspected criminals, ‘reactionaries’ and ‘anarchists’ (Morton, 2005). These intelligence reports were proactively gathered and categorised using an elaborate card index system and intelligence files; this ‘hard copy database’, supported by a dedicated team of ‘Intelligence Officers’ facilitated systematic collation, evaluation and analysis. There is surviving evidence to support that Surete investigators (agents) were tasked, directed and co-ordinated using good quality intelligence products (Heuillet, 2001).

Within the UK, from the start of land-based policing in 1829, “gathering intelligence was considered important” (Grieve, 2004: 27) and with policing firmly established by the middle of the nineteenth century, organised and systematic intelligence gathering was perceived as the exclusive prerogative of detectives developing into the CID and specialist units (Morris, 2007). The Special Irish Squad, established to counter the Fenian (Irish Independence Movement) bombing campaigns in London, quickly adopted and embraced pro-active methods of intelligence gathering (Critchley, 1978, Ascoli, 1979). However, the full dividends of intelligence-led policing and investigation was potentially inhibited and, to a certain extent, arrested by cultural protectionism and the absence of suitably sophisticated data bases (searchable archives); tending to rely upon card index systems and a ‘creaking’ paper-based General Registry (Emsley, 2002). At divisional levels, the handling of intelligence was often the exclusive domain of the CID or a single uniformed police officer, the ‘Collator’ whose personality, competence and motivation dominated local intelligence collection, storage and dissemination (Mason, 2004; Rogers, 2004). There was clear evidence that substantial volumes of information and intelligence were gathered (albeit in relatively primitive systems), but appeared to be rarely used internally (Haggerty 1997: 5). It was noted by Horvath, et al, (2001; 9) that investigation processes appeared to be relatively uninfluenced by developments in policing, including the changes in policing demands, the crime problem (with greater levels of volume crime) and technological advances.

Intelligence systems within the police were relatively slowly adopted and complementary processes expanded only with further encouragement and direction being provided by the Home Office and ACPO (ACPO, 1978; 1986; 1996). Although criminal intelligence systems, procedures and processes developed within specialist units, they initially appeared to have limited impact on mainstream policing (Newburn, Williamson & Wright, 2007: 200). The term ‘intelligence-led policing’ (ILP) gradually expanded to embrace its modern
application (see Chapter 2) – using intelligence to direct general policing (beyond just specialist units and the CID) including aspects of preventing ‘parochial’ (local) crime, disorder and maintaining ‘community safety’ as in Uniform Beat Policing (Gregory, 1967). As previously described, two notable products of the intelligence developments resulted in the 1990s, the Systems for Investigation and Development project within the MPS (Grieve, 2004: 33) and the ‘Kent Pro-active Policing’ drive in 1993 (Maguire & John, 1995) with the systematic production of intelligence routinely being used to inform and direct a range of policing activities at both strategic and tactical (operational) levels – including uniform deployment (Amey, Hale & Uglow, 1996). A number of forces adopted similar models to the MPS project and Kent Police initiatives, employing intelligence products to task uniform and community-based policing (HMIC, 1997). The evolution of this was the development of the National Intelligence Model (NIM) being an imposed requirement, as a mandatory business model, on all UK police forces (Home Office, 2002).

*Criminal intelligence*

It is noteworthy that Maguire & John (1995) in their Home Office Research Paper (No. 64) researching integrated approaches to intelligence, surveillance and informants cited Baumber’s definition (see p. 12) and did not attempt to contemporise the term. Whitaker (1999: 67) argued that criminal intelligence is anything, which is the product of ‘intelligence work’, resulting from the “systematic and purposeful acquisition, sorting, retrieval, analysis, interpretation and protection of information”. More recently, criminal intelligence has been defined as: "information compiled, analysed and/or disseminated in an effort to anticipate, prevent, or monitor criminal activity." (IACP, 2003: 4). This definition recognises that criminal intelligence originates as information that has undergone a process for a specific purpose. In this respect information is unlikely to be intelligence in the literal or practical sense until it has undergone a form of ‘process’ and a determination has been made as to its utility for operational, tactical or strategic law enforcement purposes. However, Brown (2007: 340) provides a more concise interpretation for criminal intelligence stating that it is “information which is significant or potentially significant for an enquiry”. This suggests that even raw data or information has the potential to be criminal intelligence and merely relies upon its potential ‘significance’ to an investigation. In personal correspondence with Steve Brown he qualified his interpretation by stating that:
I accept I hold the minority view on this. The 'designed for action' idea has become very well established and espoused by very many analysts. I was hosting a training session for an international law enforcement audience last month [February, 2011] and the trainers (all of them serving UK officers) used it, but it is an approach that I don't think fits well with reality. If you ask a frontline police officer who is entering a piece of information on to a CRIMINT system, he will say he is reporting it because s/he thinks it is intelligence, not raw data (Brown, 25th and 26th June 2011).

Useable intelligence generally consists of reasoned conclusions, suppositions, and informed judgments based on the collection and analysis of reasonably reliable information (IACP, 2003: 3). Intelligence is, or should be, more than speculation but may not always constitute a certainty (or established fact). Peterson (1994: 271) offered a complementary definition stating that “in most cases, criminal intelligence consists of evaluations of a wide variety of raw pieces of information that provide the basis for informed judgements and, as a whole, create enough information from which to draw reasonable inferences and conclusions.” However, she limited the ‘source of information’ to ‘suspected persons involved in criminal activity or the data resulting from analysis of criminal data collected on persons known or suspected of being involved in criminal activity.’ By this limitation, she appears to have partially precluded two other recognised forms of intelligence (both relevant to the NIM); ‘community intelligence’ based upon data provided to police and investigators by ‘ordinary’ members of the public; and ‘contextual intelligence’ relating to wider social, economic and cultural factors (generally acquired through environmental scanning).

The NIM and crime reduction
The NIM, as a statutory requirement for police in England and Wales, is intended to improve the efficiency and effectiveness of investigation and the reduction of crime (ACPO, 2005). It enjoys broader claims, in that it is intended to increase community safety, control disorder and control criminality (Grampian Police, 2010), but these may allude to its key function of reducing criminal activity through an intelligence-led approach. It has firm supporters who suggest that there is a link between NIM and operational performance (Blair, 2003), but I would argue that contemporary research indicates this as ‘not proven’ (James, 2011). However, it may provide standardisation of process provided there is ‘compliance’ or conformity with the minimum standards, which
requires substantial investment and, in the case of most public services, effective changes in policy, process and investigative procedure. For performance, the key requirement of the majority of police intelligence strategies reviewed, state that compliance with, and endorsement of, the model is paramount (North Yorkshire Police, 2007; MPS, 2009; Durham Police, 2011).

Another critical factor appears to be timely and proportionate reaction to tasking decisions, and this demands an adequate “tactically deployable capability” (ACPOS/Centrex, 2006); or more simply - ‘adequate resources’. The Government Office for the North East (2010) confidently pronounces that “NIM ensures that activity to reduce crime, disorder, anti-social behaviour and substance misuse is delivered” – this may be aspirational and no evidence is presented to support the statement. As a development of ILP and Problem Oriented Policing (Goldstein, 1990) the NIM was originally articulated as a law enforcement strategy that sought to reduce crime (Ratcliffe, 2008). The Select Committee on Welsh Affairs (2005) confidently reported that the NIM would “mean that we can now create strategies that will reduce crime and improve the quality of life in our community”. However, it remains debatable whether a single ‘model’, introduced to increase the efficiency of investigation and tasking decision making, does improve ‘quality of life’. There is substantial support from both sociologists and criminologists that the causes and rates of crime draw on a broad range of factors that include cultural, systemic, economic, educational and legal. Academic studies continue to perpetuate a fundamental disagreement and discussion on the causes related to increasing crime. For example, Stephenson (2006) and Currie et al (2002) rely upon a partial socialist philosophy that the main cause of crime is unemployment. Alternatively, Boswell (2000), reviewing serious juvenile offenders, provides a more pluralist argument that it is ‘socialisation’, including being exposed to, or the victim of bullying related to, violence and sexual assault. The influential findings of Rutter & Smith (1995) are radically different – dismissed by Cohen (1995) - according to their study the main causes of crime was post-war freedom and individualism.

Regardless of the actual reasons for crime, whether individual factors or a ‘mix’, there remains considerable uncertainty as to whether the police (even when attempting to work in partnership) employing the NIM can have any significant impact on the general crime rate and the associated societal anxieties (Reiner, 2011). Bratingham & Faust (1976: 285)
suggested that primary crime reduction is the responsibility of the general population; secondary crime reduction relates to social ‘interventions’; and the police only provide tertiary intervention through the criminal justice system. These interventions have been modified over the years with Van Dijk & de Waard (1991: 484), and Tonry & Farrington (1995) offering similar, but alternative schemes, but these views differ with the broad pronouncements of media commentators and politicians. Laycock (2008: 59-60) states that crime prevention is a generic term incorporating a range of techniques designed to stop crime from happening or reducing the probability of crime occurring. She proposes that all crime reduction techniques fall loosely into only two categories: ‘social’ or ‘situational measures’ (or a combination of both). Both of these categories require a substantial investment and active partnership by ‘other parties’, not just the police. Yet the effectiveness of the police and public service investigators, as the perceived key agents of crime reduction, at least in the eyes of the public and the media, remain dominant.

In isolation, even if the NIM could deliver improved intelligence-led investigations, decision making and deployment, Carson (2007: 408) suggests that the typical criminal investigation does not exist in the sense of a ‘most common example’ (ACPO, 2005), because the norm is ‘no enquiry’. This research has not revealed any evidence to support that the NIM has increased the number of investigations or prosecutions within the public service. Seeking analogous results with the police, broadly compliant with the NIM, reliable temporal comparisons were made more complex with the adoption of ‘counting rules’, with some indications that police statistics may be under-recording (Hough & Maxfield, 2007), possibly reflecting the introduction of performance targets. These were further exacerbated with the introduction of the National Crime Recording Standard in 2002, requiring the police to adopt a ‘victim-led’ approach to crime recording. And, regardless of the ‘national picture’ of crime, the UK continues to receive ‘negative press’, particularly relating to violent crime with headlines trumpeting ‘UK shamed as the crimes capital of Europe’ (Daily Express, 2010). Comparatively, and employing 2008 figures, the UK recorded the highest number of domestic burglaries at 284,427 amongst our EU partners (this was inaccurately reported as the UK figure is actually 309,001) – nearly equalling the combined total of France and Italy (319,330) that featured respectively second and third on the ‘league table’ compiled by Eurostat (Tavares & Thomas, 2010).

Violent crimes also featured and revealed that the UK recorded 1,094,066 offences,
unfavourably shadowing France with the second highest total, but with less than a third (331,778) of the UK figures.

*Fraud in the Public Service*

It appears likely that improved cross-agency intelligence-led investigation; data sharing and consistent working practices could provide significant benefits in the ‘fight against crime’ and, predominantly within the public service, ‘crime’ relates to fraud. Fraud continues to rise and “pose a major risk” (Morgan, 2011: 31) to society and public services, this is particularly the case with regards to the delivery of social benefits (National Audit Office, 2006: 3). With benefit payments accounting for the largest governmental ‘budget head’ in 2009/10, this is an obvious target for fraudsters. The Centre for Policy Studies (2009) suggests that the current 50 benefits will require Treasury funding of £186bn. However, the complexity of the benefit system delivers substantial governance difficulties and consequently increases vulnerability to fraud and error. As an example the Department for Work & Pensions (DWP) manuals on ‘*how to apply benefit*’ run to fourteen volumes and 8,960 pages; a separate four volumes and 1,200 pages are required by the local authorities, just to administer housing benefit. Add to these the HM Revenue & Customs instructions, required to facilitate the payment of the, now notoriously administered, Tax Credit - requiring two further volumes and 260 pages of direction, qualification, assessment and instruction (Johnston, 2009).

Fraud is a growing public and political issue, but one that has not necessarily been fully acknowledged by the public service agencies or by the Home Office. By DWP estimates, the cost of investigating fraud in 2008 was £154m, which resulted in £22m recovery of fraudulently claimed benefits (recovery being less than 14% of the investigative process cost; and less than 0.012% of the benefit budget). This raised concerns with the Committee of Public Accounts (2008: 3) questioning both the efficacy of the benefit administration system; the investigation process; and even the accuracy of the data. In 2006, public service fraud losses were conservatively estimated at £6.4 billion (2005-06), excluding income tax fraud and public sector fraud against the EU (Levi, et al, 2007) however, the current figure, more realistically, estimates fraud losses at between £18bn - £25bn (NFA, 2011b; Cabinet Office, 2011). In the DWP alone, the 2007 figures state that 6,756 individuals were prosecuted for fraud and this figure is dwarfed (less than 3% of fraud referrals) when compared to claimants dealt with by administrative sanction or
investigations that are ‘filtered’ to be designated ‘error’ (DWP, 2010a: 28). Confusingly, and regardless of a growing public concern over the increasing levels of fraud, in 2007, DWP senior managers decided to reduce their fraud investigative capacity by 40%.

The Fraud Review (2006: 7) states: “fraud is massively underreported” it continues by proposing that “in the wider context of anti-fraud activity the police must develop effective partnership arrangements with a number of sectors and interests who operate in this area” (ibid: 63). The Review contains nineteen references to the National Intelligence Model (or NIM) in the main text, and strongly supports the need to employ the model and intelligence-led policing (Ratcliffe, 2008) to support a strategic response to the expanding problem and cost generated by fraud. The cost of fraud is not restricted to direct financial loss, identity fraud continues to rise with CIFAS (2010) reporting a ‘continuing surge in identity fraud’; based upon 2009 figures: 14% increase in identity fraud (up from 49,140 cases to 56,063) and a 22% increase in ‘victims of impersonation’. The IPS Annual Report (2009-2010) states that 7,344 frauds were ‘detected or deterred' from passport application, albeit this was a shortfall on the target of 9,407. However, these figures, although reasonably impressive at first sight, represent a small proportion of passports issued (‘detected and deterred’ represents about 0.1% of passports issued). The IPS appears to resist any comprehensive accounting and may even be in ‘conscious denial’ over the ‘identity fraud problem’; their ‘common sampling’ methodology (to evaluate fraud) is simplistic and only designed to evaluate ‘compliance with process’ (IPS, 2008). Inevitably, identification of fraudulent applications are low, although most investigative staff acknowledge that it is these very processes that remain relatively weak and vulnerable. Uncomfortably for the IPS, there are occasional ‘leaks’ regarding their systems and processes through the media and parliamentary questions. The BBC News (2007) reported in February that about 1,000 passports were currently ‘missing in the post’; the following month it reported that 10,000 passports were wrongly issued by the IPS every year. This was supplemented in a Parliamentary Question (Ryan, 2007) that in 2006 there were 290,996 passports reported lost or stolen; these ‘lost reports’ were routinely not investigated and duplicates issued. The IPS admitted that it anticipated about 16,500 fraudulent passports applications were received annually and that ‘10,000 were undetected’; an interesting admission and precision for the ‘unknown’. The level of annual passports distributed remains reasonable constant with 6 million being issued by the IPS and about 400,000 by the Foreign and Commonwealth Office (Malloch-Brown, 2009).
Outside of the public services, the problem of identification fraud is considered to be significant and CIFAS have implied a reducing confidence by the financial sector who, traditionally have employed British Passports as the ‘gold standard’ and most reliable form of identity, particularly with ‘identity fraud continuing to rise’ (CIFAS, 2010).

Similarly, the DSA are not immune to the threat of fraud as the decision on eligibility to hold a UK driving licence rests with them, being responsible for administering over three million practical driving’ and theory tests in 2010. The last decade witnessed more demanding driving standards to qualify for a UK driving licence with the introduction of theory tests and basic maintenance requirements. The Agency has experienced year-on-year increases in driving candidate impersonation, employing a dedicated intelligence and investigation unit to undertake criminal investigations. For the year 2010-11 the DSA investigated 1615 cases of impersonation and illegal driving instruction, resulting in 276 cases being referred to police (DSA, 2011: 53).

**Organisational Change**

Through professional exposure, I can testify that the introduction of the NIM provoked considerable process change in resource management within the police. It required additional ‘assets’, viz. knowledge, system, source and assets (see Annex 1) to adopt the model, together with the compliance requirements of the minimum standards that has precipitated procedural revision and adaptation. It was intended to have a broad impact on decision making - providing direction and determining resource allocation. As a development of intelligence-led investigation, the NIM was not an entire novelty, rather an extension of ILP, and as Wood and Shearing (2007: 55) suggested “intelligence-led policing [the NIM] does not re-imagine the police role so much as re-imagines how the police can be smarter”. By ‘smarter’ this should, ideally, result in greater efficiency and effectiveness – aspirationally, translating itself into reduced crime and increased community safety. Indeed, the strength of a ‘change force’ is determined by its ‘impact on the business performance of an organisation; a strong force for change can result either in a substantial decline, or improvement in performance’ (Strebel, 1997: 538) and, as previously discussed, the assertion that NIM enhances police performance is unproven and remains statistically elusive.
Osborn and Brown (2005: 184) suggest that there are four main impetui to innovation and change within the public service and that these can be categorised as: "research, 'market demand', 'political imperative' and 'the need to be seen to perform'"; the latter stimulus sometimes referred to as 'conspicuous production'. Potentially, all of these featured in the decision to promote the NIM as a working synthesis of ILP and problem oriented policing (Goldstein, 1990). At the close of the millennium there was continued media (transferrable into the public consciousness and therefore ‘market’) demand and a New Labour initiative provided a political imperative to promote better performance within the police. Finally, ACPO embraced the model (strongly encouraged by David Phillips, the Chief Constable of Kent) – despite criticism from some quarters, including an NCIS executive’s complaint that the model was rather ‘over-engineered, too complex’ (cited in James, 2011: 126). The adoption of the NIM appears to have generated ‘conspicuous production’ having resulted in reorganisation (OIUs), recruitment (intelligence staff) and regular assembly (tasking and co-ordinating), as well as triggering a consequent plethora of documentation (DWP, 2005) – and it continues to do so. In addition, the NIM was perceived as a new idea for non-police agencies, innovative and relatively unfamiliar to their operational investigative community. It potentially failed effective diffusion due to a range of factors including cultural resistance, the absence of a formulated change plan and identified ‘champions.

Diffusion of innovation
At the time of its introduction into the DWP, IPS and DSA, the National Intelligence Model represented a considerable, and potentially complex, innovation to the public service investigative community. This community, effectively comprising a relatively elite and discrete social system within the greater organisation, was typified by a separate autonomous culture, working outside of the mainstream business and ‘core processes’. From previous exposure and research (Osborn, 2008) it was identified that prior to the NIM adoption, the fraud investigation teams appeared to experience limited personnel ‘churn’ and long-service investigators were a very common feature. In comparison with the police, investigative practices were predominately reactive and traditional with operational individual’s undertaking the range of intelligence gathering, development and analysis to support their own investigations. Within this social framework, for the adoption of a novel idea diffusion is necessary to enable acceptance and embedded process and behavioural change. Diffusion is a form of ‘social change, “...a process by which alteration occurs in the structure and functions of a social system”’ (Rogers, 2003: 6).
Essential to the process of diffusion is effective communication and the ease of the innovation’s accessibility and adoptability. Communication is most effective when transmitted and reinforced by ‘opinion leaders’ and these are almost exclusively drawn from the social system or cultural group being subjected to the change. These individuals may hold institutional power, e.g. designated supervisors, or be informal leaders holding status in the group that is awarded credibility through competence, experience, social accessibility and conformity to the social norms. Their role can be critical in delivering the messages associated with change adoption, ensuring that the “innovation is communicated through certain channels, over time, among the members of a social system ... a special type of communication in that the messages are concerned with new ideas” (Rogers, 2003: 6). However, the implementation did not identify, nurture and support ‘opinion leaders’ from within the investigative staff, nor did it seek to incentivise the transition, which could have increased the rate of adoption (Rogers, 1973).

Ideally, in the homophilous social system of the agency investigator – one that features a strong and relatively insular culture – the diffusion of new ideas would be predictably difficult. Such insularity and ‘strength in numbers’ can support traditional beliefs and practices particularly without identified champions for change (Kong, 2011). Being separate from, and not sharing the common processes, associated with the core business this social group with elitist tendencies, is able to resist decisions that are authoritative or collective, essentially allowing each member of a social system to face their own innovation-decision” (Orr, 2003: 3). For such change to occur it requires knowledge acquisition; persuasion (forming a favourable or unfavourable impression of the innovation); decision (choice whether to adopt or reject); implementation; and confirmation (or reinforcement).

The perceived complexity of the language used to describe the model and the minimum standards (Innes, & Sheptyki, 2004) reported by subjects in this, and earlier, research would impair knowledge acquisition. In the absence of identified champions, persuasion did not appear to be an identifiable strategy of the senior managers who adopted the NIM and then unsuccessfully attempted to implement it, by imposing the revised systems upon the operational staff. From this research and previous findings (Osborn, 2008) the investigative personnel have formed an unfavourable impression of the NIM, suspicious of
its relevance, provenance and suitability to the non-police public service. As such, the implementation has foundered and continues to be resisted. I would argue that, potentially, the most damaging oversight by the senior managers was failing to recruit and support champions and opinion leaders within the operational staff. Schon (1963: 84) argues that “the presence of an innovation champion contributes to the success of an innovation ... the new idea either finds a champion or dies”. Champions and opinion leaders do not guarantee success, nor do they control attitudes as much as pre-existing norms; therefore change agents must, if possible, communicate to them a convincing argument in favour of innovation that accentuates the compatibility of the innovation with the system norms.

There was a need from the outset of the NIM adoption to clearly communicate the potential benefits to investigation, decision making and the reduction of fraud. The model required some translation for the opinion leaders and operational staff together with a clear indication of the potential benefits that intelligence-led decision making, investigation and joint working would deliver. This required marketing the innovation and setting an ambitious target, together with the investment in appropriate resources, to facilitate a reasonably swift and painless adoption. According to Rogers (2003: 221) the “rates and incidence of adoption appear to be influenced by five factors: relative advantage, compatibility, complexity, triability and observability”. To focus upon just two of these factors – complexity and triability – the NIM was (and continues to be) perceived as complex and the language relatively incomprehensible, due to its police-partiality, providing a negatively relativity to its rate of adoption. Delayed adoption tends to dilute the innovation and may even provide supporting evidence to a social group that resistance can defeat implementation, preserve traditional norms and confirm the oratory of ‘opposition leaders’ (Rogers, 2003: 27). Triability is the degree to which an innovation can be experimented with on a limited basis (ibid: 258) providing a positive relativity to the rate of adoption. I would argue that the NIM cannot be partially ‘tried’ or incrementally adopted without significantly weakening its effect, impact and potential performance. As previously mentioned “…conformity to the minimum standards and adherence to the model are paramount” (MPS, 2009; Durham Police, 2011).
The NIM and non-police public services

From previous research (Osborn, 2008) it would appear that the introduction of the NIM into public service was not well managed and a further contributing factor may be due to the potential complexity and police-partiality of model’s language and design. The absence of a ‘common language’ will potentially generate inertia to change and this was comprehensively reported by Innes and Sheptyki (2004: 6) who argued that differences in intelligence nomenclature “…are symptomatic of different ways of doing business. Further because different terminology implies different expectations of intelligence analysis, these differences may also be symptomatic of interagency tension.” The model appeared to herald a substantial change, whilst at the same time intimating that it was a transferable development of the ILP currently in vogue (Ratcliffe, 2008; Cope, 2004; Maguire & John, 2006). This may have contributed to some ambiguity, at least in the minds of operational investigators: “if we were already doing this, why all the change and bureaucracy?” (RS34). This may have added to the general resistance to change (Fisher, 2003; Kotter, 1996, 2006, 2010) and senior managers failed to acknowledge that a key determinant of coping with the complexity of change is the high degree of ambiguity that is generated (Wallace, 2009: 15). In itself, ambiguity implies confusion over what the new practices mean and, added to this, the suspicion of the NIM representing a performance and governance mechanism (RS16, RS17, RS18, RS25). Doherty and Horne (2001: 8) argue that new public service managerialism would be perceived as a way of challenging (and demolishing) the power of ‘professionalism’ – jealously guarded by investigators. The individual views of investigators, and the predominant culture, appears to have been largely ignored, this may have been naivety or deliberate policy by senior managers, either way, resistance to change is generated from a personal psychological perspective, that substantially differs from an organisational one (Agocs, 1997: 918). Even without ambiguity or suspicion, transformation requires careful planning and marketing, variation is possible and there is an argument that the average employee does not resist change per se, rather they are wary of, or dislike, certain aspects of it (Dent & Galloway Goldberg, 1999).

Added to the social and psychological challenges presented by ‘imposed change’ within an organisation would have been the perceived complexity of the model, not helped by its police-style presentation and terminology. This research identified no evidence to support a formulated change’ or implementation plan (as recommended by Kotter, 1999, Hiatt,
2006; Prosci Research, 2011), for the adoption of the NIM into the public services examined. In this respect even the, relatively, primitive ‘ADKAR’ change model (Hiatt, 2006) was not adopted by any of the public services under review. The ‘ADKAR model’ requires systematic implementation: increasing investigative staff ‘awareness’; facilitating ‘desire’ (for change); providing ‘knowledge’ (of the model); ensuring staff had the ‘ability’ to comply; and providing ‘reinforcement’. Added to this, and from professional experience, the NIM did not appear to stimulate the level of adaptation required to ensure a ‘comfortable fit’ between the external environment; and the internal structure – an essential demand when partnership was a supplementary aim (Burnes, 2009: 301). It was apparent that some of the asset requirements were considered too costly and possibly unnecessary as in the case of a discrete intelligence database (DWP, 2005; IPS, 2005). The prescribed tasking and co-ordinating processes were ‘revised’ for adoption; and, in the case of the DWP, operational (‘tactically deployable’) resources were actually decreased – effectively conflicting with an evolving organisational profile and other planned changes (Rainey, 2003: 24).

I would argue that it is simplistic to blame poor comprehension of the NIM as a model – or the associated minimum standards - on the failure to employ a change programme within the non-police public services. A good level of compliance, through change, has been achieved within the police employing the same ‘instructions’ and standards, albeit with some ‘variations’ to implementation (James, 2011). John and Maguire (2004) support the model and argued that, properly resourced and introduced the model: “represents an effort to promote effective intelligence-led-policing on a national basis and to standardise intelligence-related structures”. However, public service investigative resources are generally very lean in comparison with the police and investigators are almost exclusively reactive; carrying high case loads of as many as 50 active investigation files.

Politically, and from a reputational perspective, it would appear that public services avoid well-resourced investigation units (and the pro-active capacity this would facilitate) as this may imply unacceptably high fraud risks and losses (RS21). In addition, guidance and description of ‘performance delivery’ and ‘deployable capability’ for public services is rather unhelpfully stipulated by ACPO (2005: 4.13; 43): “performance delivery cannot be achieved if action approved by T&CG is not acted on in a timely manner” and similar to the ACPOS guidance: "every BCU needs a tactically deployable capability ....”, they
provide a list, which is lacks relevance to any public service attempting to engage in a change programme as it includes: dogs, patrolling officers, traffic patrol and public order units. This requirement, strongly partial to police business, may create both a hindrance and a tension for public services. Even if the main motive for adopting NIM was purely ‘performance related’ then public services, as hierarchical bureaucracies, may lack the flexibility to adapt the standards from established processes and procedures; or the identified ‘assets’. All public service organisations, lacking the guiding commercial principles offered by turnover and profit, will be easily frustrated by adaptive demands and, in attempting change and innovative processes, these may be particularly difficult and complex (Osborne and Brown, 2005: 229). The police, not provided with ‘choice’ or discretion regarding ‘compliance’, still lack complete standardisation with NIM processes (James, 2011) and SOCA have adopted their own ‘version’ of the NIM. Agencies are not bound by legislative requirement to comply or subject to any inspection regime. I would argue that this latitude, enabling ‘cosmetic adoption’ and inconsistent implementation would potentially impoverished the model and will contribute to a continuing failure to deliver benefit to intelligence-led investigation and decision making.

Summary
The conversion of the Kent Police Model into the NIM as national policy was not a construct of the Home Office or central government, being commissioned by ACPO (Christopher, 2003: 178) and designed within NCIS. The evidence for policy transfer – ‘lesson drawing’ (James and Lodge, 2003; Hill, 2009) – is circumstantial and relies upon the adaptations made to the Kent model to provide a national product. The time line (pages 56-58) covers the period 1975 - 2006 from the Baumber Report (ACPO, 1975) to the Scottish Police ‘Guidance’ on the NIM (ACPOS, 2006) and is included to provide an illustration of key events, initiatives and themes that, through policy transfer, may have impacted upon the design by NCIS or development within the Home Office. The revisions to ILP and the Kent model included the addition of a ‘strategic element’; the broadening of application to general policing; and the construction of the NIM minimum standards enabling a test of compliance. A number of potential policy transfer ‘contributors’ to the NIM were reviewed and it is proposed that strong candidates are COMPSTAT for the strategic element; community policing with regards to promoting partnership and advocating wider adoption of the model (beyond the police); and New Public Management
in describing the NIM as a business model and performance management tool (NPIA, 2008).

The ACPO/Home Office description of the NIM as a business model (ACPO, 2005), although not entirely convincing as an agreed definition is elusive, appears justified. Potentially, the term business model is still developing (Zott, 2010 and Treece, 2010) and the NIM does provide a system and process centred on activity. Conformity or compliance with this process should facilitate intelligence-led investigation and, even in the absence of direct financial accounting, it is intended to deliver cost-effective policing through targeted priorities and more efficient allocation of resources. However, it is argued that a less controversial title would be an intelligence process.

The review of the origins of intelligence and ‘criminal intelligence’ illustrated that the acquisition and application of intelligence is not a new concept in investigation or resource allocation. It provided a summarised progression of intelligence employment, focusing on its rudimentary intelligence employment within the police and its relatively slow evolution to ‘intelligence-led policing’. It reviews this term and places it into context as a core ingredient of the NIM, although it recognises that there is still some controversy over its actual definition. There is a paucity of evidence to support that the NIM reduces crime or improves investigation within the public service. In isolation, even if the NIM did deliver improved intelligence-led investigations, Carson (2007: 408) suggests that the typical criminal investigation does not exist in the sense of a ‘most common example’ (ACPO, 2005), because the norm in response to referrals for both the police and public service, continues to be ‘no enquiry’. However, it has affected decision making and the processes of both tasking and co-ordinating within the police service. This research has not revealed any evidence from testimony or activity data to support that the NIM has increased the number of investigations or prosecutions within the public service. Focusing exclusively on fraud – the predominant criminal investigation within the public services - there is no apparent evidence to support that the NIM has reduced this risk or increased the number of investigations. However, it should be acknowledged, this does not provide a fair test of efficacy where the model and minimum standards are not complied with – and previous research (Osborn, 2008) suggests that, within non-police agencies, nonconformity is widespread.
The final part of this chapter reviewed organisational change and the introduction of the NIM both into the police and the public services. From the police perspective the introduction was compulsory and more measured, being an extension of both ILP and community policing; the terminology was, broadly, familiar; and a number of the assets were already in place or available. For public services the adoption of the model demanded some translation and interpretation, as the language is partial to police business, and potentially unfamiliar to outside agencies. The ‘Guidance’ and standards appear to have been ‘cluttered’ with a lexicon of products and terms that, in themselves, may provide limited parallel in public service investigative processes. As an example, the purpose of tasking and co-ordination is clear and sound: “to determine and communicate decisions based on the development of intelligence products” (ACPO, 2007: 13) – sadly, the ‘Guidance’ and description thereafter is not. For public services, adoption of the NIM required substantial variation to traditional investigative practices; and the resourcing and acquisition of a range of assets. In the absence of any apparent ‘change process’ within the non-police agencies, the model’s adoption appears to have met with a number of barriers, both organisational and cultural. I would argue that with operational engagement with, and systematic planning of, the NIM implementation, this resistance could have been reduced; assets and resources acquired; processes adopted; and conformity achieved. The following chapter will review the results of the research, endeavouring to establish the level of operational conformity with the NIM minimum standards by non-police public services and to identify whether benefits either as a business model or an intelligence-led process have been identified by operational staff.
Chapter 5: Data Analysis; the results

Introduction
This chapter will open with a brief review of my earlier research findings (Osborn, 2008) within the non-police public sector regarding the operational practitioner’s views on the issues of the NIM ‘compliance’, application and perceived value of the model. This earlier work provides a foundation to the current research. The research results follows this summary, reflecting and corresponding to the format of the structured interview (see Appendix 4). The main profile of this chapter employs the six themes relating to: 1. compliance and conformity with the NIM; 2. impact on fraud; 3. partnership; 4. the NIM as a business model; 5. investigative efficiency; and 6. the revised minimum standards. It will conclude with an extended ‘Summary Discussion’ on each of these themes to evaluate and place the interview testimony into the context of the research.

Earlier research findings
The NIM had drawn support from senior managers in police agencies (RS01 and RS02) and a number of public services, e.g. DWP, IPS and DSA, that adopted the model to support their investigations in 2005. By that time all police services had implemented the model as part of the National Policing Plan requirements, and the ACPO/Centrex ‘Guidance on the National Intelligence Model’ (ACPO, 2005) had been published. The NIM was reasonably well established, although not uniform in implementation, within the police by April 2004 (Police Reform Act, 2002), with the significant majority having introduced the NIM practices by 2002. John & Maguire (2004: 2) reporting on their fieldwork in 2002 and in liaison with the National Intelligence Model Implementation Team in 2003 stated that: “It should be noted that, with an obligation on all forces to be ‘NIM-compliant’ by April 2004, change has been rapid in this field of activity with much progress being made ...”.

However, this level of adoption should not suggest that the NIM was not without its critics, Dr Anne Davis (2007), formerly Head of Analysis in the MPS, in conversation, described the inception of the model as ‘empirically unsound’. Objective reviewers have also expressed reservations: “that the use of community intelligence is marginal” (Kleiven, 2007: 13) and that the exploitation of intelligence remain of ‘low status’ due to: ‘a combination of police culture, lack of knowledge within management and police officers,
the absence of a general definition of 'intelligence', a lack of guidance around community intelligence and the secrecy surrounding intelligence...’ (Kleiven, 2007: 21). Even Ratcliffe (2008), a supporter and published exponent of ILP, acknowledges that the NIM has ‘limitations’ in progressing intelligence-led investigations, and this may be amplified for non-police agencies with limited resources and an extreme focus on crime. Part of the difficulty for public service partners is the perceived ‘partiality’ of the NIM for police application (RS09, RS11, RS17, RS22, RS31 et al) and this may be explained by the processes continuing to be driven by ACPO, the NPIA and the Home Office (Newburn, et al, 2007: 220). In addition, findings from two such ‘non-police organisations’ in 2007, (the Identity and Passport Service, and the Department for Work and Pensions), where exclusively investigative staff were surveyed, suggested that compliance was largely cosmetic (Osborn, 2008: 31).

The 2008 research (Osborn, ibid) elicited the responses of a sample of investigative staff from within the DWP and the IPS, both of these agencies having ‘adopted’ the NIM and it had been a part of their investigative processes for 3 years. The majority of respondents (60%) were aware of, and had received training in, the NIM. However a quarter of the respondents from the survey (26%) were unaware that their respective organisation used NIM to support intelligence gathering and investigation. Only half the respondents (52%) agreed with the statement ‘Our investigations are intelligence-led’; which is a pre-requisite of NIM compliance. The responses regarding tactical and co-ordination meetings revealed that there was variation between the two public services with only one respondent, from five investigation managers canvassed, being a member of a tactical tasking and co-ordination group.

There was a limited level of awareness of the NIM intelligence products, e.g. tactical assessments (52%); strategic assessment (39%); problem profiles (39%); and subject profiles (35%), predictably though, only from the respondents who were aware of, and had received training in the NIM. A final point of note was the response to a question regarding whether the respondent’s Investigation Unit had a discrete intelligence gathering resource; nine of the investigators questioned (39%) recorded ‘no’ or ‘don’t know’. Both public services engaged in the research had Operational Intelligence Units (albeit they are relatively new to the IPS); which would suggest poor communication and an extremely limited contribution from intelligence products in their investigative activities.
This earlier research employed mixed methods, with structured interviews for sixteen investigative staff, specifically related to the respondents understanding of the tasking and co-ordinating process (regarding the intelligence products and both tactical and strategic decision making in the investigation process). It was evident from both the survey and interview that there was a limited understanding of the NIM and substantially less of the minimum standards that provide the criteria for conformity, regardless of whether the subjects had received training in investigation. The majority (81%) of interviewees were unaware of the purpose of the Strategic Tasking & Co-ordinating (ST&C) and could not describe either the ‘control strategy’ or the ‘intelligence requirement’. As both the IPS and DWP have ST&C groups, this suggests that these products are either not generated or that the communication process is flawed. Furthermore, only one respondent was aware of their agency’s strategic priorities, but was uncertain what relevance these had to the Tasking & Co-ordination Group. There was considerable vagueness from the respondents regarding the purpose of a Tactical Tasking & Co-ordination (TT&C), nearly all of the respondents (94%) believed the TT&C group’s sole purpose was to monitor ongoing investigation and ‘case loads’ (the volume of ‘live investigations’ carried by each investigator).

The findings from this earlier research (Osborn, 2008) appeared to indicate that, potentially, it was not simply the complexity and language employed in describing the NIM and the minimum standards that was defying the investigative personnel’s understanding. There appeared to be clear misunderstanding of a core element of the model viz. intelligence-led decision making facilitated through tasking and co-ordinating. There were some indications of cultural resistance, similar to the police and I wanted to explore this further. However, to test that premise, I determined to expand the sample size and broaden the research. The following current research findings are divided thematically reflecting the format of the semi-structured interview (see Appendix 4) in the six themes indicated and rely exclusively on the products of the current primary research for this thesis.
**Current research**

**Theme 1: compliance and conformity with the NIM**

This research has identified a number of cultural parallels within the public service investigative community and the police including resistance to imposed change and a sense of elitism in comparison with ‘processing staff’. From the structured interviews and through contact with public service training course delegates, it was evident that investigators and intelligence staff remain unfamiliar with some of the language and terminology employed in the NIM literature. This research has not identified any lack of senior management support or approval for the NIM although it could not be confidently determined, through the documentary evidence or testimony available, whether the decision to adopt the NIM was fully informed. However, a number of respondents indicated (RS24, RS 33, RS35 and RS45) that no ‘operational’ consultation or engagement took place within the DWP and IPS. In addition, RS11 a DWP investigator suggested that the managers responsible for the introduction of the NIM to the Agency: “.... didn’t really understand what was involved – they still don’t” and content analysis reveals that this sentiment was replicated by four (11%) other respondents.

There remained a common perception by interview respondents, supported by a minority of students attending investigation courses, that the public service adoption of the NIM was both ‘suspect’ and ‘autocratic’ - without consultation with the investigative community; and relatively naïve – lacking a proper understanding of the model’s requirements and standards (RS28 and RS43). An intelligence manager within the IPS (RS18) explained: “I don’t think anyone fully understands NIM .... it is just too complex and the brochures, CDs and guidance will further confound rather than inform”. Three interviewees (6%) stated that they believed that their respective agencies had adopted the NIM as a partnership tool without full consideration or regard to the policy, process and procedural changes that would be necessary to accommodate the NIM.

This view was endorsed when interviewing a DWP Investigator (RS42) who stated “Rather than ‘complying with NIM’ through an alteration and adaptation of existing processes; they [senior managers] appeared to be operating the other way round. That is modifying and redefining the processes and trusting that NIM supported these changes”. I witnessed this apparent inertia as a lead consultant whilst working with the DWP Change
Team in 2006 when I was asked to ‘present and explain’ the purpose of tasking and co-ordination (following the formal adoption of the NIM). The audience proved polite and casually interested, but there was little evidence of energy or willingness to change the agency’s existing procedures and, invited to a follow up meeting four weeks later, it was determined that DWP would continue its extant practices ‘for the time being’. A former senior manager within DWP (RS23) commented:

_The model was adopted without proper review and had to be introduced without additional resources or training. I think, when the decision was made, there was not any representative from the FIU [Fraud Investigation Unit] – no, there would not have been anyone operational present._

However, this view was not generally supported by the DSA respondents. A DSA Investigator (RS36) suggested that there had been a level of discussion with operational staff and that the senior manager responsible for adopting the NIM into the DSA was an experienced investigator and aware of the conformity issues.

The NIM may appear structurally complex to non-police eyes, and through the NCIS and police-partiality of the terminology, it may confound full interpretation and understanding, as James (2011: 257) suggests: “_the ethos of the model was lost in translation_”. From the summary of responses outlined below, I would argue that from the public service investigators’ perspective: ‘the ethos, structure and potential products of the model were lost in translation’. From the earliest review John & Maguire (2004: 8) identified that a substantial investment would be required by any organisation adopting the NIM stating the:

_complexity of all the developments pose a considerable challenge to police forces in terms of knowledge and professional competence (and hence training) as well as creating a need for organisational structures and systems properly suited to working in the new environment._

Whether the absence of a meaningful change programme to introduce the NIM was due to lack of comprehension, organisational torpor or poor change management is difficult to judge from the interviews. However, the level of understanding from the respondents was particularly low with more than half (57%) indicating that they were uncertain of the model’s purpose. When questioned about the language and terminology used in the NIM
description and the minimum standards, a larger proportion (66%) criticised it for its complexity, partiality and confusion. Typical of these responses was a SOCA BITSU Manager (RS07) who stated: “seems a bit complicated ... too complex and ‘wordy’”. An IPS Investigator (RS15) said: “I don’t know too much about the National Intelligence Model other than what we covered on training”; following a supplementary question this trained operational investigator inaccurately described the NIM as being the same as the Intelligence Cycle (see Figure 1.2). An Investigation Manager from the DSA (RS31) articulated a reasonably common theme: “the description, examples and instructions probably all have some meaning to the police, but we are not the police – it needs to be written in a way that we can understand and interpret it”. These comments were supplemented by another public service investigator who declined to be interviewed, but stated: “we were expected to follow NIM, but really it was more about processing referrals and doing a few more checks [exploiting open and closed intelligence sources]. It didn’t really affect me or the way we investigated.” In many respects these comments are not a critique of the core themes of the model, rather they indicate a genuine lack of understanding as to the model’s purpose and, from an operational perspective, how to apply and comply with its minimum standards, thus potentially denying the agencies potential benefit.

I extended some sympathy to the Investigator (RS25) who apologetically, and loyal, responded to my opening question thus: “I don’t fully understand NIM, but I suppose we do follow the processes”. This form of response was echoed by a number of other interviewees (16%) and investigative trainees who simultaneously admitted a lack of comprehension concerning the NIM and the standards, whilst expressing a belief that their organisation was compliant. On further questioning regarding the respondent’s understanding of the model, RS25 answered:

I remember looking at a CD, but it wasn’t very clear and it didn’t seem relevant to what we do; and I thought it had more to do with the police than us. The diagrams were weird and I don’t think anyone in the department really got it.

Further questioned on whether there was any alternative information provided, it was intimated that the investigative team (department) remained nonplussed, RS25 admitted:
We were given a briefing, but all that did was to remind us of the importance of [intelligence] checks and that they were going to introduce a filtering system so that, as investigators, we did not, automatically, get all of the referrals. The work did not really change and we are still following the same investigations as we always have.

This response was enlightening in a number of ways, firstly it appears that the intended sole introduction to the model, provided for this investigative team, was the NCIS CD and that a supplementary briefing was only provided in response to the failure of this medium. Secondly, this investigator appears to be confusing the intelligence-led process, as a core theme of the NIM, with a newly introduced referral filtering system, which may have had more to do with reducing caseloads by diverting perceived criminality into a category of loss and error. In hindsight, the CD was probably a very poor choice as an educational tool and has now become a notorious feature of the NIM-launch. In my service as a police officer and since, I have never identified a single investigator who viewed it all the way through. The final comment on this theme should be accorded to a seasoned DWP Investigator (RS30): “The model was not fully understood by anyone really, to start with ... nothing much changed and we were doing the same investigations”. From this investigators perspective, the introduction of the NIM, initially, signalled ‘no change’, and whatever asset investment, in terms of systems, processes and policy that may have accompanied the model’s introduction, evidently failed to impact on their operational investigative environment.

To provide national consistency, implicit in its title, through intelligence-led investigation, decision making and tasking; and to facilitate and support partnership, adoptees of the NIM are required to comply with the Code of Practice and minimum standards (NPIA, 2010). The ‘Guidance’ (ACPO, 2005) provides the practical detail required for compliance and under the Police Reform Act, 2002, it is a mandatory requirement for the police. Police compliance is subject to inspection by the HMIC: “it is against these standards that inspection is undertaken and the ‘level of compliance is determined” (NCPE, 2006 and HMIC, 2008: 7). There is no apparent qualification to the standards or exception to the NIM Code of Practice for non-police users, and, as stated in Chapter 1, the Home Office affirms that the model “is not confined to, or restricted for specialist usage. It is relevant to all areas of law enforcement; crime and its investigation, disorder and community safety” (Home Office, 2002; para. 3.1.3). I would argue therefore that conformity to the
NIM, by any adopting agency, requires the ‘assets’ outlined in the model and compliance with the processes and procedures outlined in the minimum standards (ACPO, 2005: 103).

From the subject’s responses, e.g. RS25 and RS30, it appears that the terminology employed in the Code of Practice and minimum standards are an aggravating factor to compliance. The response from the SOCA BITSU Manager (RS07), an organisation with similar core business to the police and familiar with police parlance, stated that the standards were complex and ‘wordy’. The comment from the Investigation Manager from the DSA (RS31), an intelligent and experienced investigator, was almost an apologetic appeal, “the description, examples and instructions probably all have some meaning to the police, but we are not the police”. This endorsed a common theme from public service investigators, that the NIM standards and instructions were unclear. Furthermore, it was believed that the NIM did not accommodate a variety of ‘users’; the standards of compliance appear the same, regardless of agency and there are no caveats or evident alternatives tendered. The additional ‘guidance’ that has been provided since 2005 (see page 144) appear to adopt the same style, language and terminology, perhaps further frustrating comprehension for the non-police agency. This was endorsed by RS31 in the request that the model and standards “needs to be written in a way that we can understand and interpret it”. However, from the response of RS42 it was apparent that non-compliance may also be an unwillingness to conform to process and procedure “Rather than ‘complying with NIM’ through an alteration and adaptation of existing processes; they [senior managers] appeared to be operating the other way round”.

It was evident from this research and exposure through consultancy that the public services do not conform to the NIM and that this was generally acknowledged by investigative staff and managers. The ‘adoption’ of the NIM by the DWP and the IPS was apparently not accompanied by consultation with operational staff; the provision of appropriate resources and assets; appropriate training; or a formulated change plan (RS23). This may have hardened cultural resistance and increased uncertainty surrounding the new processes. Five years after adoption, investigative personnel are still uncertain and unfamiliar with the model and the requirements for compliance, potentially due to the language and terminology employed in the ‘Guidance’ and supporting literature. However, it should be acknowledged that the implementation within the DSA was more measured and although,
initially, under-resourced and without a discrete intelligence unit, there was less apparent resistance by investigative staff.

**Theme 2: establishing the impact the NIM has on fraud within the public service**

Predominantly, the core business of public services is ‘service delivery’, e.g. benefit payments, the issuance of passports or the administration of driving tests; governance of policy; integrity of entitlement; and ‘duty of care’ for the public purse (Audit Commission, 2010: 29; Smith, 2010). Unlike the police, their business is not associated with community safety and the NIM is not designed to deliver benefits to public service core business; exclusively the NIM is employed by the agency’s investigative community (where one exists). However, it should be acknowledged that agencies may profit from reduced risk or improved detection rates – provided that the model delivers benefit in crime reduction. However, this benefit is limited as they do not share the broader community safety demands of policing “*the police maintain law and order: protect members of the public and their property; and prevent, detect and investigate crime*” (Strathclyde Police, 2010).

In this respect, the investigative activity of public services is dominated by a single crime – fraud; “we probably do deal with ‘volume crime’, but of only one type” (RS33); and the NIM, to deliver benefit, must impact upon that crime. However, the fraud level continues to rise with Pricewaterhouse Cooper (PwC) reporting that now 60% of public services experienced some levels of fraud in 2010; an increase of over 15% from the previous year (PwC, 2011). Disturbingly, according to PwC, the profile of the public service fraudster may be shifting from the ‘opportunistic’ and external perpetrator to the internal fraudster (globally, public service organisations that suffered economic crime, reported that 57% of the fraudsters were internal). For the NIM to add value to non-police agencies, the intelligence-led investigation and decision making processes need to reduce the levels of fraud perpetrated (and consequently the number of referrals); enhance financial recovery; or increase the efficiency and effectiveness detection and investigation which, for public service investigative teams, are subject to performance targets.

With restricted access to alternative and reliable evidence, the methodology employed to establish the impact that the NIM has on fraud within the public service has relied upon the perception of investigative staff in interview testimony. However, this line of questioning appeared to rapidly become redundant as a continued level of ‘uncertainty’, regarding the profile of NIM, became apparent. Exclusively drawing on the comments from public
service investigators and intelligence officers (n=20) to canvass ‘coal face’ opinion, the majority (59%) asserted that the NIM had made no difference to the agency’s vulnerability to fraud and risk; over a quarter (27%) said they did not know; and a slim minority (17%) said they believed it had. The managers tended to be more upbeat in their assessment with the majority believing that the NIM had registered a positive effect on investigation in general and specifically to the reduction of fraud, although no statistical support or empirical evidence were alluded to or tendered.

The following selection of responses from interview provides an indication of the general tone from investigators. A mature and experienced DWP investigator (RS25) said: “... we are still following the same investigations as we always have. The Intelligence Units are really in name only and don’t seem to have increased our results – if anything we are slowed down by their work”. This was a reasonably common theme, repeated by delegates on a number of investigation courses, that the operational intelligence units added little and effectively slowed the work of the investigators. This was supported by a DSA Investigator (RS46) who stated “I am not entirely sure that the OIU offers any real help to what we do yet”. An investigation manager from the IPS (RS18) suggested that: “it [the NIM] does not reduce vulnerability or risk, although if analysis was properly applied to closing operations [Operational Analysis] it may show – you know, identify – weaknesses in processes and show areas of weakness in both application and issue”. However this view was contrasted by a DSA Investigation Manager (RS34) who stated that their Agency was not compliant, but contradicting his co-worker (RS46): “we do not do it [the NIM] properly at the moment”, but continued by saying that “the Intelligence Unit has improved the quality of our intelligence and I think that has made us better at our investigations”.

On questioning investigators and intelligence officers as to whether the NIM impacted on fraud losses, the majority (55%) were unsure and a number of them (9%) stated they were unqualified to answer, being too new in the role to comment on a historic process. A minority view (11%) was that it had little impact and this was supported in interview with an IPS investigator (RS19) stating “it [the NIM] makes no difference.”. The context of this response was repeated by a co-worker (RS20) who suggested that the model was “useful for investigation, but that is ‘after the fact’ so I don’t think it was designed for reducing fraud.” There was less qualification forwarded by an IPS Investigation Manager (RS17) who replied “I don’t think it is designed to reduce fraud”. This comment is
revealing and perhaps provides an illustration of a core weakness in the model – essentially that it is not exclusively or specifically designed to reduce fraud and is therefore perceived by agency investigators to offers relatively limited benefit. Confusion over the purpose of the model was typified in the response by an Investigation Manager (RS18) who commented “I don’t believe that NIM increases or decreases much at all – other than bureaucracy”. This was a reasonably common view held respondents and a range of public service course delegates – even those who support the model – that it has, administratively, increased their workload and ‘interfered’ with the process of investigation (by removing their ability to select referrals; determine what intelligence is necessary to progress the investigation; and then undertake their own collection and collation). A seasoned IPS investigator (RS16) commented that the NIM: “hasn’t made us any better at investigating fraud or detecting it. It was probably better before when we - as investigators, managed the whole lot – more referrals were investigated and we got better results I would say”. This investigator identified the ‘before’ as emanating from the implementation of Intelligence Units – fundamental to the NIM – that, to him, typified the change and a dilution of effectiveness on the investigators role.

From the investigators point of view, the perceived ‘culprits’ for the failure of the NIM to impact on their fraud investigations are the staff of the Operational Intelligence Units who generally attracted censure from the operational investigative community, particularly regarding their lack of experience and professionalism. It is quite possible that this criticism is largely unwarranted, although the Intelligence Officers are generally drawn from process backgrounds and may, therefore, be unfamiliar with some aspects of the operational work of the investigators. From interview, it appeared more likely that the denigration of the intelligence staff originates from investigators sensing a loss of prestige and control, clearly inferred by the comments of a DWP Investigator (RS25), who soberly delivered this explanation:

Before, [the adoption of NIM] the investigator would deal with the referral from start to finish. They still used intelligence and this was part of the checks, really they determined whether the referral would be investigated or not. NIM has meant that the checks are done elsewhere – within the FIU [Fraud Intelligence Unit – the equivalent to an OIU] and the investigator receives the intel’ at the start of the investigation.
Comments similar to this and associated sentiments have been common to all of the public services with intelligence units that I have worked in, either as a trainer or consultant. The substantial majority of investigators encountered during this research associated the NIM with the work of the Intelligence Units, the 5x5x5 system, and little else, consolidated by the comment of a recently retired IPS investigator who stated: “… we don’t need the OIU – we all know how the 5x5x5 system works”. In this statement and supplementary comments from respondents (RS25, RS45 and RS47) on the ‘products’ generated by the intelligence units, the DWP and IPS investigators appeared to ascribe no ‘added value’ to their fraud investigations. Rather, they viewed the intelligence staff activities as ‘interference’ and bureaucratic (RS38 and RS42) and as an imposition on fraud referral and investigation management. Interestingly, where analysts are employed, and these individuals are invariably members of the Intelligence Units, they were not collectively included in the negative comments – often being perceived as professionals and part of the ‘investigative cadre’ who can make a contribution to fraud investigation.

A potential, and fundamental, problem with public service Operational Intelligence Units (OIU), in contrast to the police, originates in their purpose and application. In a number of cases this included a stated intention or inference that the OIU would, effectively, subordinate and regulate the activities of the agency investigators (see 1, 3, 5 and 6 below) and provide a monitoring and reporting function to senior managers with regards to fraud reduction objectives and targets (see 7 below). This has fomented cultural resistance within the investigative community whom, until the OIU inauguration, had enjoyed high status within the agencies; a degree of autonomy that brought additional financial benefits in overtime; and accredited with specialist knowledge, expertise and experience. To illustrate the changes introduced alongside the introduction of intelligence units, I will provide one example, although it has currency and relevance to a number of the agencies reviewed, the following edited extract (public service memorandum: D/2330/rest – GPMS, 2005) provided the rationale and template for intelligence units setup within a major public service.

1. *Operational Intelligence Units (OIU) will be a resource both to investigators and to other staff in each Region.*

2. *They will allocate work to investigators under the direction of a senior manager and the OIU will monitor progress in the work allocated.*
3. They will obtain operational intelligence, managing the interface with other agencies and ensuring compliance with relevant legislation.
4. They will quality assure applications under RIPA (Regulation of Investigatory Powers Act) managing external challenges to the process of approval.
5. Where there are overlaps between investigation units, they will be the conduit for resolving boundary issues.
6. The OIU will also be the first point of contact for staff that are seeking assistance and will task investigators with support as required by the Region.
7. They will collate all referrals and manage the over-capacity of referrals, ensuring that quality data is not lost in the process of work allocation.
8. Lastly, there will be a feedback loop to senior management to inform in year adjustments to targeting.

The intention is to ensure that investigations are intelligence-led. This will deliver efficiency savings in the deployment of resource that should more than compensate for the cost of efficiently handling intelligence. At a greater level of detail, the current process, whereby many investigations are taken on at the level of individual investigators in the field can be wasteful. Quite apart from the problem of ensuring that delivery equals specification when investigations are selected by investigators; there are the questions over how those cases are chosen, and the resource that is consumed in making selections. The creation of an OIU will remove that task from operational investigators, leaving it with specialist intelligence analysts.

The final paragraph of this ‘OIU implementation summary’ commences with a core doctrine and purpose of the NIM however, as it continues, it clearly introduces the concepts of performance management and has all of the hallmarks of adopting the NIM as a tool of NPM. It therefore promotes a fundamental question and raises a suspicion that, for this agency, the adoption of NIM was more to do with NPM than investigation. From professional association with this agency, I can confirm that they failed to predict the resistance encountered from their established investigators and the introduction of the intelligence units failed to deliver the aspired benefits to intelligence-led investigation or performance management.

An investigator (RS19) provided this simplified and, somewhat jaundiced, view of the NIM and the introduction of intelligence units: “it’s about getting intelligence and having an intelligence unit that feeds the investigators I think ... and making sure that the investigators only look at relevant cases and stay on track”. A senior manager (RS21) held a different view and, in response to question regarding the core themes of the NIM, appeared to combine both NPM philosophy and intelligence-led process as a reason for
adoption: “Employing SOPs [standard operating procedures] with regards to referral management, investigation and disposal, whether that be suspension, cancellation, recovery – or in the case of applications – decline”. This view was broadly supported by an Intelligence Officer (RS22) a member of an OIU, who claimed that the adoption of NIM required: “.... due consideration to intelligence when reviewing referrals and investigating”. This response alludes to intelligence-led investigation, but then RS22 qualified his comment with performance and integrity considerations: “we need to make sure we are compliant with DPA [Data Protection Act] and can show that we are focused in getting the intelligence and not just going on ‘fishing expeditions’. It’s about audit trails and accountability really”. The term ‘fishing’ or ‘fishing expeditions’ refers to a form of casual data mining of personal data on established storage systems, with the intention of identifying anomalies or irregularities that may indicate fraud. Searches of this nature, without a clear and stated objective or referral-based target, are proscribed by organisational policy, and the Data Protection Act, 1998 (the exception under s.29 effectively demands a ‘referral’ or investigation, before any search) and contrary to the ethos of the Intelligence Cycle (Figure 1.1).

The apparent ‘confusion’, by senior managers, over the purpose and reason for adopting the NIM was neatly summarised by an experienced DWP investigator (RS37):

\[\text{There appears to be some confusion with the policy designers [the senior managers who adopted the NIM] that by using a relatively sophisticated referral filter, we are ‘evaluating intelligence’, whereas, in truth, this is really just a system of ‘selection’ and does not place a true emphasis on ‘intelligence-led’ enquiry. Using the FRISC system [Fraud Referral Information Scoring Card] it enables the organisation to: enable unbiased and legal selection of fraud referrals for investigation; facilitate the management of fraud investigators workload; and enable targeting of resources at most risky cases. As you know before processing the case through FRISC the RM [Referral Manager] has to decide whether fraud action is appropriate. No action may be taken in the following circumstances: no trace of customer; no trace of a benefit claim; customer has already reported the change; and allegation does not affect benefit entitlement.}\]

This respondent effectively articulated a view, commonly held by investigative staff within the DWP and IPS, that adoption of the NIM was essentially ‘process driven’ and the model was conveniently exploited to support planned procedural changes relating to performance and governance, with little regard to intelligence-led investigation; improved tasking; or
productive partnership. This was not a view shared by the DSA investigators, not employing a ‘scoring system’ for the selection of referrals for investigation.

Theme 3: the impact on partnership and joint working

The NIM is intended to be workable beyond the confines of ‘law enforcement agencies’ and that these complementary parties should to be capable of collaborative tasking and coordination (Home Office, 2002; para. 3.1.3). There was little evidence from either testimony or review to suggest that the adoption of the NIM by the public service had facilitated increased joint working and productive partnership. Only two of the public service respondents (4%) interviewed, an IPS Investigation Manager (RS18) stated that the NIM “…helps in partnership”; whilst a senior manager (RS21) provided an ‘organisational perspective’ stating: “It is an essential attribute of partnership working and ensures consistency of both approach and case management”. However, the substantial operational view (55%) was that the NIM made no difference to partnership, but a number of subjects were prepared to optimistically qualify these comments by stating that, if standardisation could be achieved, more collaboration and effective joint working would take place. A DWP Investigation Manager (RS09) explained: “Most of our joint working is really led by the police, sometimes we are contacted by SOCA, but not ‘collaboratively’ or as ‘partners’”. In response to a supplementary question on what would increase and support meaningful partnership, the manager replied:

We need a simplified and special version of NIM for us … for the public services I think, yes probably one for the public services so that we can at least be on the same ‘score card’ as prospective partners. That’s the problem really we still do different things – you know like different referrals and even investigations so that there really isn’t any proper commonality – we don’t know their systems and they definitely don’t know ours. Sometimes it doesn’t matter too much … particularly if it is just about swapping information – you know, like intelligence sharing. Other times it does matter though and even the terms and language is all wrong, you need a translator, or a glossary, or a thesaurus to know who does what, where and when.

A DSA Investigation Manager (RS34) suggested that “At the moment, and in its current form, NIM does not encourage partnership and really, apart from 5x5x5 it has not facilitated consistency”. This was complemented by an investigator colleague (RS37) who stated “prospective partners all have their own versions of NIM” intimating that, without standardised processes, productive joint working was not possible and this indictment was
confirmed by an IPS Investigation Manager (RS17) who said: “it [the NIM] should help if we all followed the same procedures, but we don’t!” From these comments, and those of investigative trainees, there appeared an acknowledgement that the NIM could contribute to joint working and improved partnership if a greater level of process consistency could be achieved. There was some acknowledgement from subjects (9%) that the NIM contributed to partnership working with regards to local authorities and the police through shared responsibilities for community safety. A DWP Investigator (RS30) stated: “NIM seems to work for the police and councils” and this sentiment was echoed by three other Investigators (RS26, RS42 and RS45). This perception may lack empirical evidence, but appears to have contributed to a general belief within the public service investigative community that the NIM can deliver some benefits in collaborative working. This was supported by a number of the respondents (11%) and a typical comment was: “it is intended to improve joint working” (DWP Investigator – RS24). However, it was evident from a significant proportion of the respondents (34%) that NIM failed to deliver the necessary consistency to their agency and within the broader public service community to facilitate meaningful joint working. Neither was it perceived as an accessible model for non-police agencies and organisations, with an investigative capability, with respondents (previously cited) suggesting that the language, describing the model’s processes and ‘requirements’ was very selective, exclusive and more attuned to law enforcement as a core business.

A fairly consistent complaint during this research, typified by responses from DWP (RS30) and IPS (RS47) investigators, is that when agencies have engaged in partnership, particularly with the police or SOCA, the benefit and identity fraud offences identified are considered minor, and often ‘dropped’ (not proceeded with) in favour of more serious offences. However, this sentiment was not echoed by any member of the DSA and this may be an unfair criticism of their partners as this decision would generally be taken by the Crown Prosecution Service (England and Wales) or the Procurator Fiscal (Scotland). However, the prosecutor’s decision can, be influenced and the blame, rightly or wrongly, is often heaped upon the police or SOCA. Gilling (2006: 736) argued that there needed to be transparency, honesty and trust in each partners’ motives and competence supported by a good understanding of member’s roles and processes.
The closing words on partnership should be credited to an experienced crime analyst (RS13) who responded to my question on the models impact on partnership and joint working thus:

_We should encourage collaborative working and it fits in with the broad principles of increased collaboration through information and intelligence sharing but other than the police, most of the other agencies don’t use NIM in a pure form and have a number of different types – if one of them is using the full model, that is if they are completely ‘NIM’ed’ - I haven’t seen it._

**Theme 4: NIM as a productive business model**

This line of enquiry attracted very few informed comments and was quickly frustrated by the declared naivety of the research population with regards to the actual processes of the NIM and the subject’s inability to differentiate between a model and process. For the majority of investigators the NIM was a ‘model’, because that was its title. This was not the dominant response in the structured interview trial, however this may have been due to a more ‘informed’ audience. The managers from the research population, potentially with a greater understanding of the NIM core doctrine, were inclined to rebut the Home Office claim of the NIM being a business model. A DWP Investigation Manager (RS09) stated quite categorically that the NIM was not a model “it’s really a set of instructions; rules and requirements that explain or describe a process” and an IPS Investigation Manager (RS17) suggested that it: “…. just describes the investigation procedure, or processes”. Another Investigation Manager (RS18) provided a reason for doubting its nomenclature stating:

_I think a business model should be easy to follow and you should be able to draw it on a single page. This is a scheme or construct. It is idealistic, that doesn’t matter, but it should be possible and we haven’t got the resources or the infrastructure to make it work._

The structured interviews on the issue of the NIM as a business model delivered an inconclusive result and no real dividends. Responses were broad and, perhaps predictable, equally split between the ‘yes’, ‘no’ and ‘don’t know’ responses, with slightly more detail and rationale being tendered by the managers. On reflection, and appropriately, I must take responsibility for this unproductive line of research; it quickly became evident that the subjects held no firm views, or particular interest in the typology of the NIM. For the majority its description and title was relatively academic, more important to them, was that they did not particularly understand the NIM and they saw little value in it.

**Theme 5: the potential benefits to investigative efficiency or effectiveness?**
This theme formed a critical part of the research and provided a test of the perception of operational investigators and managers as to the potential benefits of the NIM. Although not congruent to the police, there is a discernible and similar culture within the public service investigative community, with slight variations depending upon the organisation or agency environment. As such, and from the investigator’s perspective, for the NIM to be effectively adopted it needs to be acknowledged; understood (Skogan, 2008); and embraced as a practice and procedure (or process) that delivers benefit to the investigative process (Maguire, 2006). This adoption by the investigative community should be reinforced by tangible results regarding detection and apprehension. To the significant majority of respondents (75%) they were unable to determine any benefit to their investigations. Indeed as indicated previously, the NIM was seen as an unhelpful and disruptive imposition. This was summarised by an IPS Investigator (RS19) who stated: “it [the NIM] hasn’t really made any difference”, but was willing to qualify this critique by continuing, “... having looked through the standards, I’m not sure we do it. If we conformed to them we might be better off – I’m not sure though we don’t really have the resources or the commitment”.

This view was countered by a senior manager (RS21) who appeared convinced of the benefits derived from adopting the NIM: “we all investigate in the same way. Employing SOPs [standard operating procedures] with regards to referral management, investigation and disposal, whether that be suspension, cancellation, recovery – or in the case of applications – decline” although this response may lack ‘operational familiarity’ and appeared to focus more on performance and organisational consistency. A DSA Investigation Manager (RS34) in a written response stated: “at the moment and in its current form NIM does not encourage partnership and really, apart from 5x5x5 it has not facilitated consistency”. In interview RS34 provided a qualification to this, stating: “I am sure that investigations should be intelligence led, I am just not sure we need all of NIM to make that happen”. An IPS Investigation Manager (RS17) provided a parallel that was descriptive, but ended dismissively: “it is the process that the police follow. We do some of it and we do use intelligence, but most of the model is not really necessary or appropriate for the investigations we do”. I include the following response from a DWP Investigation Manager (RS33) in full, as it clearly and comprehensively articulates a common view within the DWP:
As we discussed, they [the NIM minimum standards] do not seem as if they are written for a non-police audience and, in that respect, probably do not fit the type of investigation we undertake in the DWP. We probably do deal with ‘volume crime’, but of only one type and our tasking processes are more concerned with ‘case conferences’ and making sure that we apply our limited resources to the referrals with the greatest chance of success, whether that be termination of benefit, recovery or prosecution. The introduction of NIM was considered, by some of the investigators, as an imposition and there was complaint that proper consultation was not invited. The view remains that the introduction was a political inspiration by senior managers and had little to do with [investigative] performance – we do not currently have any PIs [performance indicators] regarding NIM compliance and little evidence to demonstrate that we have improved investigations due to it.

This response provides a number of insights into some of the resistance that the introduction of the NIM may have encountered within some public services; and a suggestion that this may be perpetuated. It introduced the familiar theme that the language and terminology employed in the model and minimum standards has the effect of distancing non-police audiences, and this was a common and dominant factor encountered throughout the research. The respondent is not entirely dismissive of the NIM acknowledging that the ‘volume crime’ element may have some relevance, whilst attempting to place and describe the model in the context of agency policy and practice. However, he identifies and voices a collective perception that the NIM was introduced as a politically inspired ‘device’ and not as a credible process to improve intelligence-led investigation or informed tasking (decision making).

A qualified statement by a DWP Investigation Manager (RS09) provides further interpretation of the model from the perception of an operational supervisor; a comment on its complexity; and concludes that there is no perceived value:

*It should really be relatively simple - intelligence collation, based upon a collection plan, evaluation (you know like five by five for intelligence), analysis and then dissemination – the profile of the intelligence cycle effectively. It has been made far too complex and therefore, from our point of view it doesn’t add value to countering fraud either individually or acting collaboratively.*

In general, the comments from the managers appeared more thoughtful and qualified in their criticism of the model, particularly when compared to investigators and intelligence officers who had the necessary experience within the role to make a comparison of ‘before and after’ as in the case of the DWP Investigator (RS30) who simply stated: “For us – it
doesn’t work”. This was marginally amplified by a DSA Investigator (RS31) who stated: “Our work only really focuses on regulation and fraud - not a variety of crime, so NIM doesn’t affect the way we work.” This suggested a fundamental misunderstanding over the purpose of the model, as a tool to ensure intelligence-led investigation and to support improved tasking, and this was demonstrated with supplementary questioning when the respondent cautiously suggested that the NIM was: “about the Intelligent [Intelligence] Cycle and identifying the most common crime in an area” (RS31). A recently retired IPS investigator (RS47) was equally vague about the purpose (or potential benefits) of the model, despite working for over a decade within the role and the last 5 years in an organisation that has adopted the model: “NIM helps the police I think, I’m not sure why we had it, but we don’t investigate crime like them”.

Theme 6: review of the revised NIM minimum standards

The NIM is supported by eleven different elements, in total 135 minimum standards (ACPO/Centrex, 2005) and legislation ensures that chief officers of police have regard for these (Police Reform Act 2002) and must ensure that their forces adopt the practices of NIM and implement the required minimum standards. As an alternative, for review by the majority of the research population (85%), I revised the NIM minimum standards, removing the police terminology; reducing the volume to 20 pages; and simplifying the language; re-branding this compilation as ‘Revised National Intelligence Model for public services: Minimum Standards’. As part of this research, I circulated the document (see Appendix 3) to 40 subjects and simply asked: “What is your view of the revised minimum standards?”.

The sanitising of the standards (removing police terminology) was acknowledged by three of the respondents and typical of their responses was that of an IPS Investigator who commented: “all the references about police have gone” (RS16). This was supported by a DSA Investigator who stated “I can understand it better without all the police jargon ...”.

Predictably, the majority (31: 66%) indicated that the revised standards were an improvement, being substantially shorter and employing clearer language, although a proportion of the subjects qualified their responses, for example a DWP Crime Analyst (RS13) stated: “the standards seem better and are shorter than the originals – it might help make the NIM more popular, but it still seems very demanding ...”. An Investigation Manager from the DWP (RS09) echoed this sentiment stating that the revised standards:
“are shorter and clearer. If anything I would still like to see some of the requirements made easier maybe even removed”. An IPS Investigation Manager (RS17) made a similar observation: “the ones you revised seem better, they are shorter and I thought easier to understand. These would be better to implement, but they are still demanding in terms of us needing to behave or act more like the police”. These comments provided a prevailing theme in that my revision of the current NIM minimum standards, although more concise and providing increased clarity, still appeared too complex, as further endorsed by the following comments: “... more straight forward and easier to understand”, but qualified the answer by stating that the guidance on tasking and coordinating was still too complex: “I still think that tasking is too complicated and doesn’t really fit our needs”. (DWP Investigation Manager, RS21)

A senior manager within DWP, referring to the revised standards, stated: “I think I have a better grip of what we are supposed to be doing under NIM” (RS24), which would support the contention that non-compliance may not be evident (even to senior management) and that a contributory factor is translating the requirements of the NIM. However, a DSA Investigator, although complimenting the revised standards for its clarity, shared a supplementary common view in their written response: “much better and clearer, but we really need our own process to fit with the police” (RS36).

Summary Discussion
This chapter has reviewed the primary research findings and sought to place into context the views of operational investigators and intelligence staff within the three identified public services, the Department for Work and Pensions, the Identity and Passport Service and the Driving Standards Agency. It provides a comprehensive summary of the six themes (related to the interview protocol in Appendix 4). With regards to compliance, from subject commentary, previous research and my professional experience as a consultant, it is evident that the adoption of the NIM into the public sector has not resulted in common systems or conformity, and these variations were supported by the testimony of a number of operational staff outside of the target research group (CRB and DVLA: RS27, and RS32). Neither has it apparently delivered benefits to investigative efficiency of these agencies. From the research, it was evident that there are different levels of engagement with the model by operational staff, in this respect the two larger agencies, the DWP and IPS, are very similar with investigative communities sharing a broadly negative
perspective. The DSA investigative personnel are more positive and embracing of both the NIM philosophy and change, although the operational demands on them for fraud investigation are substantially smaller. This variation in DSA responses may be due to a number of factors and deserves further research. Speculatively, the reasons may be that the DSA investigative team and Intelligence Unit are comparatively compact and cohesive. The Intelligence Unit is perceived as professional and has been staffed with experienced personnel who work closely with the investigators. In addition, the DSA management structure is flatter, providing easier access to senior managers and decision makers. The introduction of the NIM into the DSA was negotiated and facilitated by a senior manager with investigative experience and through a consultation process with operational personnel.

The broad consensus from this research regarding any positive impact that the NIM may have wrought upon public service, from the operational investigators perspective appears to be – ‘not much’ (RS45) and a reasonable proportion appear to both dislike and distrust the model. There are a number of reasons and these should not all to be associated with cultural resistance, or even the perceived complexity of the model, although this is patently a factor. A number of the subjects, the majority drawn from the managerial grades, provided qualified statements and insight into why benefit had not been derived and, compliance achieved, since the model’s adoption. An experienced IPS Investigation Manager (RS18) provided a good summary:

> *if NIM encourages or requires a faithful allegiance to intelligence leading the investigative process, then it will help. I am just not convinced that NIM does that – it could be a question of more energy and resources being devoted to ‘compliance’, rather than actually improving investigation. No it is not effective. There is no consistency, NIM almost encourages variation because of the text and complication .... [qualifying] no, complexity. It needs to be much simpler and the requirements must be attainable by even small investigative units not just NCS, police or SOCA”.*

It is worth considering this statement as the request for greater simplicity reflects the views of a good proportion of the research population (45%) and past training delegates. It also suggests that the basic ethos of an intelligence process – to promote intelligence-led investigation and improve tasking - is not resisted, but apparently the NIM, as a model, is not a convincing vehicle for that purpose within non-police agencies, and in some cases (as above) it is clearly rejected.
For the majority of agency investigators within this study, the NIM has not delivered consistency of process and procedure; supported their investigations; or facilitated joint working and productive partnership. The compliance requirements, enshrined in the Code of Practice and minimum standards evidently appear complex and, in some cases incomprehensible to public service personnel potentially contributing to variations and ‘versions’ of the model. Added to this, the model is broadly viewed as discrete, specific and partial to the police and SOCA and potentially unsuitable for the more exclusive application of fraud investigation.

Compliance and conformity

It appears likely that the purpose of the model; the implications of adoption; and the asset and process requirements for compliance or conformity, were not fully understood by the agencies. In addition, the senior managers and the decision-makers awareness of the minimum standards regarding asset requirements, resources and process was questionable, potentially due to a deficiency of any meaningful consultation with active partners or their own operational staff. From testimony, there appeared to have been: no discernible change plan or investment in ‘marketing’ the potential benefits of the model to investigative staff. Added to this, was a very limited provision of meaningful briefing or training and there was a potential failure, by agency policy makers, to aggressively adhere to the minimum standards outlined in the ‘Guidance’ to ensure conformity.

The identified difficulties experienced by non-police agencies in conforming to the NIM raises the question of the suitability of the model (in its current form) to public service employment. The limited operational resources and tactical capabilities available to agencies, together with the unwillingness and/or inability by senior managers to invest in the full range of ‘assets’, may provide further aggravating factors to confound a common intelligence-led investigative and decision making structure. This study, from the exclusive perspective of public services (discounting Local Authorities), did not support the aspirational claim by ACPO: “The NIM has significantly improved opportunities to share intelligence across forces and agencies and between local and national levels. It has reduced significant barriers to effectiveness by producing common structures and language and has effectively created a joined-up working environment” (ACPO, 2004: 5, ix). Within the agencies reviewed, a sizeable proportion of investigative personnel appeared confused by the language in the NIM literature and were either unaware or
misunderstood the processes, e.g. tasking and co-ordination, effectively frustrating the creation of common structures.

No comprehensive reason was identified as to why the agency investigative personnel describe the language as complex, unclear or incomprehensible, other than reasonably consistent reference to its ‘police-partiality’. I would argue that such partiality was deliberate in design, and not necessarily misplaced by the architects - Messrs Flood and Gaspar - both from police backgrounds and ostensibly designing an intelligence-led model for the police and NCIS. However, as mentioned in Chapter 1 and confirmed by subject testimony, in its current form, the perceived complexity of the NIM (Flood, 2004: 51), as presented within the “Guidance” (ACPO; Centrex, 2005) remains a potential weakness (as Newburn, et al, 2007: 210).

**Impact on fraud**

In the public service, with the sole exception of the local authorities’ ‘Community Safety Units’, criminal risks and vulnerabilities are dominated by fraud (National Fraud Authority, 2009; Serious Fraud Office, 2008). The majority of subjects perceived little benefit on fraud investigation from the implementation of the NIM and a similar proportion were ‘unsure’ whether it had reduced fraud losses. This negative outlook must be balanced by the clear evidence that the organisations do not conform to the minimum standards and therefore any perceived ‘failure’ to deliver dividends to their investigation and fraud vulnerability must be tempered with the absence of the appropriate assets, tactical resources and common processes and procedures required by the model. The majority of the research population held a potentially jaundiced view that the NIM is closely associated with the introduction of process-driven Intelligence Units; disempowerment; and a perception that the NIM has been introduced as a ‘performance tool by stealth’ for which there is very limited evidence. The subjects presented a relatively ‘blinkered view’ that the NIM is, almost exclusively, an intelligence-led operational investigation tool. This perception is to impoverish both the purpose and potential dividends of the NIM, which as a model or process has the potential to deliver improved decision making; a significant impact on resource tasking and co-ordination; and the benefits of productive joint working.

The interview results were not consistent and despite the majority of operational investigators asserting that the NIM had made no difference to the agency’s vulnerability
to fraud and risk, the majority of managers believed that the NIM had delivered some benefit to investigation and fraud reduction. Corroboration for either statements was not tendered and statistical evidence on fraud levels is notoriously difficult to acquire (Tunley, 2011), and even with limited access to restricted documents (subject to GPMS) within two of the agencies under review, there was limited conclusive evidence to suggest the NIM has impacted upon either the volume of referrals or detections. A review of financial recovery under the asset recovery scheme was also frustrated through restriction on data and the shifting incentives offered to agencies that could potentially skew motives and recovery activity “under the asset recovery incentive scheme agencies will get back 50% of what they recover determined by the total value of receipts received in the Home Office in the financial year 2010-2011” (OFCU, 2010: Appendix A). On an actuarial scale, there is no evidence to support that the NIM has reduced fraud levels within the public service and, as previously cited, the estimated fraud losses have substantially increased in the last 5 years (Levi, et al, 2007 for 2005-6 figures and NFA, 2011b for 2010-11).

Consistently in responses and comments, the operational investigators from the DWP and IPS closely associated (and in some cases interpreted) the NIM processes with the organisational referral management system, although this was not mirrored in the responses from personnel with the DSA. This dominant view from the DWP and IPS staff included a belief that, as investigators, they had been disempowered; no longer authorised to make discretionary decisions regarding the selection of fraud referrals for investigation; and inhibited in determining sources and processes for intelligence gathering. This common perception was repeated when the subjects were questioned on the impact the NIM had on investigative efficiency and, particularly in the DWP, it has contributed to relatively poor relations between the Intelligence Units and investigative teams. This is particularly unhelpful (and potentially counter-productive) when considering the core ethos and purpose of the model – intelligence-led activity. However, as an example, within the DWP, the Intelligence Units do appear to fulfil a dual role in that they provide a degree of governance and performance monitoring through embedded filtering processes and the evaluation of fraud referrals. Traditionally, this process was undertaken by investigators, who enjoyed a high degree of freedom in selecting cases, acquiring intelligence and progressing investigations. This level of authority was uncommon to (non-investigative) process staff existing in a bureaucratic civil service environment, and it evidently provided some kudos to the established fraud investigator. The introduction of the NIM has
coincided with an erosion of this discretionary authority and a requirement to comply with legislative and procedural regulations regarding the handling of personal data, e.g. RIPA and DPA. It is possible that the negativity ascribed to the NIM and its potential impact on fraud is, in part, due to this sense of disempowerment; increased governance; and the requirement to conform to both policy and established ‘good practice’.

**Partnership**

The Home Office aspiration for the NIM to facilitate joint working and productive partnership through standardisation of process appears sound, and intelligence sharing and collaborative operations can deliver substantial benefit (HMIC, 2009). There are a number of positive examples as in the GMAC experiment (see page 27); and police operations such as: ‘Safer Streets’, ‘Eagle Eye’, ‘Regis’ (all related to reducing street crime); ‘Bumblebee’ (Burglary); ‘Strongbox’ (funded targeting police initiative); ‘Trident and Crackdown’ (reducing drug dealing and related gun crime); and the public service ‘Wisdom’ (‘Day of the Jackal’ identity fraud). However, I would argue that the effectiveness of joint working does not exclusively rely upon common systems or shared process platforms. The simple provision of ‘consistency of process’ (that is not currently apparent in the UK investigative community) or a legislative or regulatory requirement is unlikely to deliver meaningful collaboration. The notion of partnership is complex particularly when parties have different perspectives, however, there appears to be certain key elements in partnership, namely: respect, transparency, accountability, shared values, honesty and communication that is understood by all interested parties. Ideally, partnership is inclusive and perceived as a symbiotic relationship between equals (Morganton, 2003). In addition, Miller (2010: 2) argues that a dominant feature must be high levels of trust and ‘productive engagement’.

From the subjects responses, the difficulties associated with joint working and partnership appear to be the absence of a common and consistent process; differing objectives; and a perception of seniority (or inferiority). Without a common intelligence and investigative processes between partners, shared operational activities can be exacerbated and communication frustrated. From the police perspective the referral management systems of public services can appear cumbersome, bureaucratic and unfocused (RS02) – providing a highly selective and scored decision making process to determine case for investigation. From the agency perspective, the police can appear cavalier in their operational activities and dismissive towards offences that they consider ‘minor’ (and this can include benefit
and identity fraud). To supplement the subjects’ comments, my recent experience in a joint working operation demonstrated that the feature of mutual trust was not particularly evident and there was a limited consistency of language and investigative processes employed by the different members. A further difficulty, identified by Gilling (2006: 736), was that working durability of partnerships demands continuity in representation. From this research testimony and experience, such continuity of membership is an extreme rarity, unlike CDRP groups, reactive ‘working partnerships’ are often generated for individual operations, constantly providing a ‘churn’ of staff and agency representatives. On the one occasion that I witnessed a high degree of continuity over a number of years (Operation Wisdom: IPS, ‘Day of the Jackal’ series identity fraud) the partnership proved quite effective as individual trust, and understanding of differing investigative processes was provided time for nurturing and then cohesively developed. This was supported by the Major Investigation Team Manager (IPS) who referring to Operation Wisdom, stated “we worked well together with the police and SOCA as we all gain”. Potentially indicating that a number of the ‘challenges’ facing joint working and productive partnership can be overcome, provided ‘joint benefit’ through shared objectives can be established and the partnership team has sufficient time to develop critical cohesive features (Tuckman, 1965; Tucker, 1973; Tuckman & Jensen, 1977).

These features are not new to the Home Office, and a number of them were identified by the Morgan Committee (Home Office, 1991) which was described by Gilling (1997) in identifying reasons for the failure of local community safety partnerships. Local Authorities have recognised and published the ‘challenges’ to partnership that need to be addressed if they are to be productive and, significantly, these include competing demands between members; and cultural differences (Communities Scotland, 2011). However, their summary is drawn from a definitive central government source, the Improvement Network (2010) that has delivered a summary of ‘partnership killers’. These are familiar features, both from the testimony of subjects in this research and from my own involvement over the last decade attempting operational joint working, the most familiar being ‘mission creep’, ‘pulling rank’ or more simply ‘inequality’. As Gilling (2006: 735) identifies, it is of “crucial importance, first of all, that intended partnerships have a clear sense of common purpose, built around a recognition of interdependence”. Equally important is that all members can benefit and meet their own objectives, as inequality can generate tensions when partners perceive that they are the ‘junior members’ or ‘also-rans’.
McPherson and Kirby (2004: 23) who, although acknowledging the potential diversity of partners, suggested: “the NIM was devised with law enforcement agencies in mind, all those engaged in community safety will require coordinated systems and processes”. This appears to be uncontroversial in that ‘law enforcement agencies’ could be interpreted as those organisations with a core business of law enforcement, e.g. police, and includes local authorities with a statutory responsibility for community safety. However, they continued: “The NIM offers a platform that enables partnership members to share information, identify problems, process information into intelligence and subject it to analysis” (McPherson & Kirby, 2004: 24). This statement appears to broaden the potential users to any ‘partnership members’ and provides a focus on information sharing, problem identification and information processing’, potentially including other public services with an investigative capacity. However, this study conflicts with that assertion and from research testimony and review, I would argue that the ‘adoption of the NIM’, in its current form, does not offer such an ‘enabling platform’ for joint working.

**Business model**

The results from this research into whether the NIM is a business model or intelligence process was not significant or conclusive, with only a minority of subjects (28%) tendering a view. Critically, this line of enquiry proved irrelevant in the light of the general commentary drawn from interview and consultation that revealed a broad misunderstanding of the core doctrines and the model’s processes. There was general agreement that the NIM provided an intelligence-led investigation process, although the level of awareness and understanding regarding decision making element with regards to resource management in tasking and co-ordination, was very low.

**Investigative efficiency and effectiveness**

In contrast, the thematic enquiry regarding the perceived impact of the NIM on the efficiency and effectiveness of investigations drew substantial response. The significant majority of subjects reported that public service investigations had not improved with the adoption of the NIM; with the investigators from the DWP and IPS stating that investigations were now less effective due to imposed performance processes and the intervention, at referral level, of the Intelligence Units. This sentiment was not echoed by subjects from the DSA, although there was no intelligence unit within this agency until 2009. The majority of respondents (75%) were unable to determine any benefit to
investigations and considered the NIM unhelpful and a disruptive imposition on their work. A number of reasons have been proposed for the apparent failure of the NIM to provide efficiencies in investigation, predictably some relating to its complexity.

The sole claim (RS21) that the NIM delivered organisational consistency was countered by this study and, with minor exceptions as in the common use of the 5x5x5 (see Appendix 5) intelligence sharing system and a level of compliance with the Intelligence Cycle (see Figure 1.2), there appears very limited consistency. There was no resistance tendered in interview to the concept of intelligence-led investigation or decision making, to account for the evident operational inconsistencies and the subsequent frustration to productive joint working. Responses confirmed that there remains substantial confusion over the model’s process and, I would argue, that this misunderstanding, exacerbated by the language and terminology in guidance and the minimum standards, contributed to a cynical and pessimistic view of the NIM.

Perhaps equally interesting, was an underlying scepticism, manifested by investigative staff, over whether the model could deliver any benefit to their agency; including the expressed view that this was a ‘police model’ and that the public services were not members (or even associates) of that ‘exclusive club’ (RS46). These reservations were not qualified by a perceived need to conform to the model or the minimum standards. Some of these reservations and failings may be difficult to externally address, particularly those relating to cultural resistance. However, issues of perceived complexity, misunderstanding and accessibility relating to the NIM remain important issues, and potential hurdles, for the investigative and intelligence communities within the public service. In Chapter 6, I will endeavour to address these potential shortcomings in the model by proposing generic and complementary process and guidance, preserving the core doctrines of the NIM, whilst endeavouring to provide a degree of clarity and simplicity.

Revised NIM minimum standards
Acknowledging research findings from earlier study (Osborn, 2008) and the review of literature (e.g. Newburn, et al, 2007: 210) indicating the difficulty that public service staff may experience in comprehending the NIM Code of Practice and minimum standards, a revised edition was generated (see Appendix 2). The revised minimum standards attempted to edit, sanitise and simplify the original, and provide a simpler explanation and description of the model. This was circulated to the majority (85%) of the research
population inviting their view to evaluate whether a simplified version of the current standards would improve their comprehension. The document attracted positive comment from the majority of reviewers (66%) suggesting that it was appreciably more concise and delivered greater clarity. However, it did not appear to deliver a substantial improvement or remedy to the original, still being perceived as too complex (RS21) and not addressing the perception that the NIM ‘did not fit’ the public services.

In response to these comments; the research findings; and impromptu suggestions, I determined that further revision and editorial of the NIM minimum standards would be unlikely to succeed in delivering the necessary simplicity and clarity required by public service investigators. This study has therefore prompted an alternative intelligence-led process for consideration and it is proposed that the provision of a complementary system, with simplified guidance for non-police public services, may provide a remedy to some of the difficulties and resistance identified by the subjects. For the purpose of this thesis, I have included a Public Service Intelligence Process (PSIP) at Appendix 6 for consideration. It is proposed that the PSIP provides no ‘minimum standards’ as these cannot be mandatory, nor should they be ‘imposed’ on an agency that, due to resource, budget constraints or policy restrictions, would be incapable of adopting them.

The PSIP endeavours to deliver, in simple language a description of the intelligence-led decision-making and investigation process, authority levels, activity and purpose. Furthermore, it is intended that the PSIP could accommodate the discrete criminal investigation processes employed by different public service agencies and acknowledge extant policy and procedure. The core tenets and some of the key language and terminology have been preserved including: the Intelligence Cycle; intelligence evaluation (5x5x5); tasking and co-ordinating; and, critically, intelligence-led investigation as these terms will be familiar to all trained investigators. The retention of these terms should maintain sufficient parity between the two models to facilitate effective communication when engaged in productive joint working.
Chapter 6: Discussion and ‘The Way Forward’

Introduction
This research was not a critique of intelligence-led policing, nor of the National Intelligence Model, as used by the police and associated law enforcement agencies, e.g. SOCA. The NIM now appears firmly embedded within the police service with mandatory observance of the minimum standards through legislation (Police Act 2002) and subject to an inspection regime. I would argue that, in the short term, the model and its associated guidance, adopted as national policy for police, will be resistant to substantial change or revision. This research has sought to test the adherence and conformity with the NIM by intelligence and investigative staff within a selection of non-police public services and whether, in its current ‘versions’ within those organisations, it delivers benefit. It is stated in the model’s supporting documentation that “NIM derives much of its strength from standardisation and corporate approach, being particularly prescriptive when developing intelligence products” (ACPO, 2005: 60). The research findings have identified organisational and operational nonconformity with the model and the ‘Guidance’ (ACPO, 2005), potentially as a result of naivety and limited comprehension regarding the requirements. This has contributed to incongruent inter-agency processes and non-standard procedures, potentially conflicting with the ethos of the NIM and its minimum standards. In addition to the perceived complexity of the application criteria (Flood, 2004: 51; ACPO, ibid: 101), two significant causal reasons contributing to nonconformity were identified: insufficient investment in the required assets, in some cases resulting in inadequate resources; and cultural resistance manifested by the operational investigators.

The current levels of adherence to the NIM within the DWP, IPS and, to a lesser extent the DSA, do not appear to be providing benefit to investigation or fraud reduction. I would argue that, critically, where the model is not understood by the managers or operational staff within any adopting organisation, adherence will be frustrated and any ‘test’ of the orthodox model’s efficiency and effectiveness would be redundant. Alternatively, if the NIM is adopted and the minimum standards, although understood, are only selectively applied, consistency and standardisation will be frustrated and the model is unlikely to provide the full dividends through intelligence-led investigation; improved decision making relating to tasking; and productive partnership. I would further argue that some of the perpetuated difficulties in public service application and employment of the NIM
cannot be remedied. In particular, the historical features related to the introduction of the model to agencies, apparently without operational consultation and in the absence of any definable change programme, communication plan or adequate training. Perhaps as a consequence of this, cultural barriers to the change remain, and are fortified by the expressed belief of the operational investigators that the NIM is a thinly disguised performance mechanism.

The reputation of the model has suffered, particularly within the DWP, by an inaccurate association with revised organisational processes of referral management and scoring mechanisms. This appears to reinforce a pernicious perception by operational staff that the model reduces the investigators powers and discretion and is primarily intended to provide governance, rather than benefit through intelligence-led investigation. Perversely, there is also a dominant view that the NIM is exclusively suited for the police and is not appropriate for alternative public service application; although there was no suggestion that the police investigator has been ‘disempowered’ through the model’s adoption. However, a key factor of ‘resistance’ and non-compliance by operational personnel appears to go beyond this conviction of the model’s (police) partiality and features more on its complexity, due to the language used and its presentation.

In these respects, to operational investigators within the public service, the NIM is viewed as a hindrance and failure; although I would argue that any process or model can be perceived to fail if it is misunderstood or considered irrelevant. These factors present significant challenges to agencies seeking to improve the efficiency and performance of investigative teams, as the lack of conformity - enabling common and consistent processes - does subdue the potential value of the model. This chapter will review and provide a summary of the key findings relating to nonconformity within the public service, and explore potential remedies to improve intelligence-led investigation, decision making and productive partnership. It is presented in three parts: the first, reviews the suitability of the NIM to public services; the second, discusses the issue of conformity and compliance with the model; and finally, it reviews alternative intelligence-led processes accessible by non-police agencies that may complement the NIM.
The issue of conformity

It is apparent that some of the difficulties with conformity, and operational resistance, to the NIM identified in this research, could have been avoided, or reduced, on implementation. However, the senior managers responsible for the adoption of the NIM apparently failed to recognise a number of key factors, including the investment requirements and the necessity to revise investigative processes and procedures to accord with the compliance criteria. Before adoption (pre-2005), the public services operated on traditional models of investigation; both the progression of an enquiry and intelligence gathering function being undertaken by an individual fraud investigator. The public services had not experienced the evolutionary intelligence-led experiences, initiatives, activities and processes associated with the intelligence-led policing over the last three decades. Their investigative departments are comparatively small, localised and with very limited access to the growing technological infrastructure enjoyed by the police and its associated agencies, e.g. formerly NCIS, NCS and now SOCA. In addition, there was a reasonably strong elitist culture within the public service investigative community similar to the police in its conservatism and cynicism (Christopher, 2004: 180), based upon specialised knowledge; discretionary powers; and the exclusive experience and exposure to the criminal justice system. It was predictable that this culture would be resistant to change (Fisher, 2003 and Kotter, 2010); and it appears that public service investigators share with ‘rank and file police officers’ “...the capacity to undermine innovative strategic change by continuing to work, almost impervious at the workplace, in a traditional, culturally defined ‘comfort zone’” (Holdaway, 1983 and 1998; Chan 1997 and Manning, 1997). The introduction of the NIM therefore faced a number of challenges: cultural; no legacy of widespread intelligence use; an ill-defined intelligence function; lack of awareness and expertise in the model’s functions; and a limited intelligence development capacity (Carter & Carter, 2005, cited in Ratcliffe, 2011). Added to which, adoption appears to have been piecemeal, without attempting to market the potential benefits of the NIM; investing in the necessary assets; and, more critically, without attempting to seduce, induce or incentivise the investigative community to accept and engage in the change.

To comply or conform to the NIM ‘Guidance’, the appropriate level of resources and the acquisition of ‘assets’ provide an essential foundation and these include: knowledge assets; system assets; source assets and; people assets (ACPO/Centrex, 2005). In summary, these assets are *knowledge asset*: ‘knowing’ the business of criminal investigation;
understanding the law; associated policies; and statutory guidance, e.g. RIPA and PACE. System assets include acquiring the appropriate systems and structures, including secure environments and practices; source assets ensure that information and intelligence is effectively gathered and managed from as many sources as possible. The people assets require the establishment of a professional personnel structure with trained and suitably skilled staff to carry out the required functions within the model (ACPO; Centrex, 2005; HMIC, 1998; HMIC 2001a, 2001b, 2001c; Maguire, 2000). For policing agencies – with the core business of crime reduction - these ‘asset requirements’ are available, and even before the introduction of NIM, many services and forces had a number of them in place. However, this was not the case for public services with alternative core business, where the fraud investigation and security departments are viewed, proportionately, as a relatively minor resource to the overall agency. In addition to the ‘assets’ providing a supporting framework, the NIM minimum standards provide a comprehensive, and relatively inflexible, inventory of process and procedural requirements (see Annex 1), that deliver the detail for compliance. The aspiration of the NIM is to ensure common systems of intelligence-led investigation and decision making across law enforcement communities, as the Guidance states, the model is not: “confined to, or restricted for specialist usage. It is relevant to all areas of law enforcement; crime and its investigation ...” (Home Office, 2002; para. 3.1.3). However, this aspiration appears to rely on standardisation through consistency of process and procedure and this demands conformity with the model, the Code of Practice and the minimum standards.

It is possible that the introduction of the NIM into non-police agencies was politically inspired, although this is based upon the uncorroborated and partial testimony of investigative staff; the appeal to ‘adopt’ the NIM’ for senior managers could have been to overtly demonstrate agency concern regarding fraud and a willingness to undertake further investigative activity. Equally, the adoption could have been motivated by a genuine and sincere attempt to improve investigative efficiency and reduce the level of fraud. In either case, adoption of the model also demanded serious investment to safeguard consistency, compatibility (NCPE, 2005: 7) and to ensure conformity, if it was to secure the potential benefits through intelligence-led investigation and tasking. Regardless of the motive, senior managers within the public services under review, determined to adopt the NIM and, in the DWP, even generated its own minimum standards (DWP, 2005). This agency and other public services continue to assert, unequivocally, that their investigative teams
employ it. This is not supported by the testimony of operational investigators, revealed in this study, who persist in manifesting a disruptive form of cultural resistance. Intelligence does not appear to be routinely employed to support referral selection, investigation, or decision making. As an example, there appears to be continuing poor relations between the intelligence unit’s staff and the investigators, with a significant proportion of the latter perceiving the NIM as an encumbrance and a mechanism to reduce their discretionary powers, e.g. referral selection, and as a thinly veiled performance and governance tool.

I would argue that a contribution to nonconformity is the absence of any similar mechanism to the HMIC for public services, providing an inspection regime for agency investigation processes, although the Audit Commission could provide a substitute. As such, adoption remains voluntary (the Police Reform Act, 2002 exclusively relating to the police) and compliance is broadly unregulated (and the individual vagaries of agency senior managers are unpublished). It is controversial whether, without substantial investment and procedural revisions, the public services investigative capability could fully comply with the NIM minimum standards and, in the present financial climate, such investment appears unlikely. To cite one example in the DWP, since the introduction of the NIM in 2005, investigative resources have been significantly reduced by nearly 50%. Structurally, public services continue to operate very differently to the police and, as described, their role does not directly contribute to core business. Unlike the police, the top-tier of agency management and policy makers will generally be unfamiliar with investigation, intelligence gathering and the model. This limits their credibility to demonstrate ‘informed’ operational (tactical) leadership, to provide investment and committed management, all of which are essential for compliance (John and Maguire, 2004: 6). Lack of comprehension is not the exclusive domain of public service senior managers as operational managers and staff appear to have genuine difficulties in understanding the NIM support literature, including the standards necessary for conformity and, even when translated, explained and placed more into the public service perspective, they may still confound genuine efforts at compliance.

The misunderstanding of the model has predictably resulted in a number of ‘variations’ and may contribute towards serial non-compliance and lack of standardisation within public services. This is manifested through a high level of inconsistency in investigative process; consequent failure to commit to productive partnership and joint working; and result in the failure to secure the potential efficiencies from intelligence-led investigations
and decision making. However, these comments should not be construed as any interpretive shortcomings or inadequacies on the part of managers or investigators within the public services, rather an indictment on the style, terminology and sheer volume of ‘descriptive’ literature and ‘guidance’ associated with the NIM. The police-partiality of these documents has been covered in earlier chapters, and the research findings suggest that interpreting and adopting the guidance and instructions remain a significant challenge to public service personnel.

I began this chapter by noting that the fact that any meaningful revision of the NIM, requires both emendation of the existing legislation and an overhaul of the current inspection regime. That would appear to be a remote possibility and would potentially be divisive for the police. I argue, that the difficulty with public service conformity or compliance is predominantly the terminology employed by the NIM ‘Guidance’, including the adoption of phrases such as ‘community safety’, ‘managed hotspots’ and ‘potentially dangerous offenders’ (John & Maguire, 2007: 211); and the perceived complexity of the model (Newburn, et al, 2007: 210). My attempts within this study to deliver a more concise and simplified set of standards in the Revised National Intelligence Model: Minimum Standards (see Appendix 3), although attracting some approval, failed to provide substantially greater comprehension. Arguably, that failure could be attributed to its retention of the spirit of the NIM and its continued association with the police and the exclusivity of the model’s application as: “a business model for law enforcement” (ACPO, 2005: 8).

This study has shown that the NIM is unpopular with operational investigators who view it as unhelpful, inappropriate and associated with performance management and governance. Compliance with the model is demanding of investment and operational resources, potentially unaccommodating of extant public service practices and the dominance of their single investigative pre-occupation - the reduction of fraud. Provided the NIM continues to be perceived as providing a business process for policing, it will be viewed as an overly-complex and unsuitable model for a minority investigative community operating within the confines of a larger service-driven bureaucracy. I propose that an alternative simplified and more compatible process should be identified as a matter of urgency. The relevant public sector agencies need intelligence systems and processes that maintain the central tenets of NIM but which are more closely tailored to the needs and expectations of those agencies.
Suitability of the NIM to public services

The NIM, its Code of Practice and the minimum standards were designed for the police and similar law enforcement agencies, which have community safety as their core business. As previously mentioned in Chapter 5 “the NIM was devised with law enforcement agencies in mind, all those engaged in community safety will require coordinated systems and processes” (McPherson and Kirby (2004: 23). The fundamental difference between the police and the public services is significantly more than just the variety of crimes that they engage with. The purpose of the police (to quote just one ‘Statement of Common Purpose’) is to uphold the law; to prevent crime; to pursue and bring to justice those who break the law; to keep the Queens Peace and to help and reassure people (Metropolitan Police Service, 2011). Predominantly, the concern of public agencies is ‘service delivery’, and ‘duty of care’ for the public purse (Audit Commission, 2010: 29; Smith, 2010).

Potential beneficial outcomes for the NIM

The anticipated public policy outcomes from the NIM were neatly summarise by Harfield & Harfield (2008: 105) “…a desired outcome – enhanced community safety and reduction in crime and disorder through the effective use of intelligence within police forces and partner agencies.” From the exclusive police perspective, Flood and Gaspar (2009: 54) argued that the NIM was “…an ideal model for the whole business of policing” adding that it would enable the police to “…understand and anticipate risks and threats across the public safety domain”. Critically, the NIM introduces a strategic element to both decision making and investigation, attempting to counter earlier political and media concerns and accusations of dominantly reactive features of traditional policing. Ratcliffe (2008: 1) supports this by suggesting that a primary role of intelligence-led activity and therefore the core purpose of the NIM is to anticipate future risks to public safety and influence decision makers.

Essentially, the NIM describes a process, its affinity to intelligence-led policing is evidenced through its origins with earlier initiatives including Compstat, community policing and problem oriented policing, culminating in the SID Project and the Kent Police Model. As a potential business model, and perhaps more realistically a managerial philosophy, data analysis and its intelligence products are “pivotal to an objective, decision making framework that facilitates crime and problem reduction, disruption and prevention.
through the strategic management and effective enforcement strategies ...” (Ratcliffe, 2008: 89). This is endorsed by Sherman et al (1998), with a recognition of the demand for collaborative strategic management to impact upon crime and disorder, potentially providing further stimulus for its inclusion within the NIM.

Although process driven, implicit to the Home Office policy expectations for the NIM was that, through unified processes and conformity with the NIM minimum standards, it would deliver access and the employment of a broader range of data sources (see page 28). Thus enabling agencies to mine and harvest a variety of repositories and enabling the review of trends, problem areas and through collation and analysis, to effectively identify causation factors and profiles prior to committing resources (Clarke, 2004; Eck, 2006). This proactivity should contribute to ‘long term gains’, and Ratcliffe (2008) argues that the NIM will support long term strategic management. He summarises the potential gains as: crime reduction; top-down management; the generation of (quality) crime intelligence; resource management; and providing focus on prolific offenders and serious offences. This is broadly supported by Peterson (2005), but qualified arguing that the NIM (and intelligence-led investigation) can only become a reality if intelligence analysis is incorporated into the essential tactical and strategic planning undertaken by all collaborative agencies – thereby demanding a common protocol, standard and system.

The potential benefits of the NIM is to facilitate ‘joined up thinking’ and complementary strategic planning (regarding crime reduction and community safety) across the range of public services with a criminal investigation capacity. Phillips (2008: 29) identifies the strategy related to the NIM as “...making the best use of resources, time and space ...recognising the contingencies on the ‘wider canvas’ and identifying a winning formula in the prevailing context.” He continues by providing a cautionary observation and warning “...strategic aims are all too easily set aside for short term advantages.” and that has become a more symptomatic and frequent feature of a performance culture and new public management.

The Home Secretary’s desired outcome from a uniform intelligence-led model, arguably sought to encourage and facilitate intelligence sharing and unimpaired collaboration, providing a unified effort to reduce crime. Harfield & Harfield (2008: 96) comment that “Although NIM is usually presented as the starting point for intelligence, it should perhaps
be regarded as the end point of a process leading to informed decision making ...”.
Simply, this process model supports the conversion of data and information into intelligence. It is also intended to encourage and facilitate intelligence application and decision making to inform interventions between organisations on a collaborative basis. In theory, the NIM seeks to impose a policy based framework on varied circumstances and organisations, the outcome of which is “…increased agency capability and capacity for direct application in accordance with community need and in response to the criminal environment” (ibid: 113). The NIM continues to offer some opportunity for a common and shared comprehensive strategy based upon as full an understanding as possible of the crime and disorder environment. However, this commonality depends upon consensus and concurrence and these supposed strengths of collaborative working, co-operation and teamwork “…are in fact the inherent weaknesses of the NIM implementation” (ibid: 98).

Fraud

The investigative activity of the agencies under review is dominated by a single crime that of fraud and, as an example within the DWP, the Fraud Investigation Service represents a very small proportion (1.5%) of the 117,000 staff employed (DWP, 2008: 4); and within the IPS only 2% of the 4000 staff. Their activities, although important to the organisation’s ‘duty of care’ obligations regarding public money, make a very limited contribution to the agency’s primary purpose regarding benefit administration and issuing passports.

However, fraud remains a problem disproportionately attracting public and ministerial attention to the work of public services, which in turn demands attention, and some response, from their senior management. In my professional association with agencies, it is apparent that there is a heightened sensitivity towards the actual cost of fraud and in some fatalistic senior managers the level is viewed as inevitable. Perhaps they are being realistic as the fraud level continues to rise with Pricewaterhouse Cooper (PwC) reporting that now 60% of public services experienced some levels of fraud in 2010; an increase of over 15% from the previous year (PwC, 2011). According to HM Treasury figures, the annual cost of welfare fraud and error is £5.2 billion (DWP, 2010b; 3). Again, to use the DWP as an example, 9,000 cases of benefit fraud are prosecuted annually, making DWP’s legal services the largest public service prosecuting authority (DWP, 2010b: 22) and benefit fraud investigations account for 95% of an investigators caseload (Collins, 2006).
From my consultancy with the IPS Major Investigation Team in 2008 this level of fraud referrals was proportionately mirrored in the operational investigators’ caseloads. I would argue that the NIM, as a business model or process for public service investigative teams, has a highly focused and exclusive appeal – that of crime reduction, which is not the case for their partners within the police, harnessed with broader social demands (Reiner, 2011).

From the police perspective the NIM, as an evolved model of ILP, can potentially provide benefit for the whole organisation as a business model: delivering “the core business model for policing...” (ACPO, 2005: 9); and the “management of volume crime” (Flood, 2004: 46). Although supportive of intelligence-led investigation, this is not the case for public services, with a significantly narrower organisational application for the model exclusively within the fraud investigation department, and dealing with a single ‘high volume crime’.

In addition, from the perspective of a senior manager within an agency, the NIM may be viewed as politically attractive but, in terms of impact on staff numbers and limited contribution to the service delivery, only as a subsidiary ‘integrity benefit’ to core service delivery, e.g. issuing passports. For the NIM to improve the fraud investigators performance, the intelligence process must be embedded in the procedures and policies related to investigation. As an exclusive measure of success, or ‘value added’ for the NIM - fraud reduction - in isolation, would perhaps be an unfair appraisal as it discounts the model’s potential capacity to facilitate and encourage productive partnership and collaborative working through standardisation. However, the broader introduction of performance management regimes (targets and counting) in recent years do not appear to have increased partnership within public services, possibly because individual core businesses, risks and performance targets are dissimilar.

Maguire & John (2006: 67) argued that the NIM, operating as an ideal, offered a ‘framework of business processes’ to manage policing priorities and ‘incorporate the perspective of partner agencies’. However, there remains some disagreement as to whether performance management, actually encourages partnership or collaborative working. McLaughlin, Muncie and Hughes (2001: 37) are supportive, suggesting that performance management will encourage joint working - provided there is an opportunity for mutual gain. However, Jackson (2005: 33) and Wilson, Ashton and Sharp (2001: 85) argued that it encourages insularity and parochialism as the individual agencies compete to attain their own objectives. Gerwitz (2002) goes further with a critique of performance...
management and New Public Management, stating that the dominant drive to meet imposed objectives as the exclusive measure of achievement, potentially reduces innovation, creativity effectively ‘devaluing professional skills’. The Police Federations line is predictable and, probably, accurate, critically arguing that “’intelligence-flow’ cannot be subject to a performance culture” (Orr Munro, 2006: 22).

Conformity with the NIM ‘Guidance’ and standardisation may facilitate and increase the benefits of partnership, e.g. Operations ‘Bumblebee’ and ‘Gemini’ illustrating that it can have a positive impact on targeted volume crime (in this case, Burglary). However, both of these operations carried substantial on-costs and opportunity costs (distracting and diverting police resources from other demands). They also heralded the widespread introduction (and institutional acceptance) of ‘crime desk reporting’ - non-attendance by police officer and effectively, ‘no active investigation’ (Stockdale and Gresham, 1995; Wright 2002). Nevertheless, I would argue that productive partnership should be pursued as it could deliver benefits to public services and support the ‘intelligence sharing’ agenda across government in a united effort to reduce serious criminality – including, at least from the public service perspective – organised fraud.

With specific regard to tasking and co-ordination, for non-police public services, the terms employed together with the processes and procedures outlined in the NIM literature may, appear to have limited relevance to the broader organisation outside of their investigation teams. In addition, whereas improved intelligence-led decision making and problem solving impact upon the core business of police, for public services, criminal investigation or community safety is not the ‘core business’. Supporting compliance with the NIM presents difficulties due to the proportionately smaller investigative structure and establishments and with regards to operational intelligence-led tasking and co-ordination; they are generally not as hierarchical, nor disciplined as their ‘law enforcement counterparts’. The effectiveness of tasking and co-ordination within the NIM depends upon the quality of information feeding decision making (Herdale and Stelfox, 2008) and the manager’s ability to directly influence resources and investigative activity. A restricted view of the intelligence requirement (for example, exclusively based on performance targets) or a limited understanding of their purpose by the Strategic Tasking and Co-ordination Group will result in inadequate direction and control of the both tactical group, and the intelligence and investigative activity. Conformity with the NIM should enable an
agency to assess real or potential problems and identify an effective tactical and operational response. However, the absence of clear directions may result in the collation of either too much information or too little – the former resulting in an agency being ‘wealthy with data, but impoverished for intelligence’; the latter with the inability to employ meaningful intelligence-led investigation.

The perceived limited value to the whole organisation of the NIM, focusing exclusively on the investigation team, may explain the difficulties that public services have experienced in introducing the model and embedding a compliant and productive investigative process (Osborne & Brown, 2005: 217). There was evidently very limited consultation prior to adoption, which appeared to have excluded the operational investigators. The introduction was not accompanied by any discernible change programme and, for the DWP and IPS, the process and structural changes did not ensure compliance, and were perceived as ‘performance mechanisms’. The research has not identified any positive impact exerted by the NIM on the level of fraud investigated by the public services; although it acknowledges that an exclusive reliance on testimony from a partial source is unreliable. However, attempting to use a simple actuarial comparison on published fraud figures is notoriously unreliable (Tunley, 2011). Exclusively from the operational investigators perspective, no benefit has been derived from the NIM-inspired creation of Operational Intelligence Units (OIU), the majority of intelligence unit staff (excluding the analysts) being viewed as ‘amateurs’ and the OIU processes perceived as intrusive, ineffective and retardant to effective investigation. It appears probable that a significant proportion of this expressed irritation and vexation may be due to a sense of disempowerment by the investigative community and there remains a suspicion that they have been ‘regulated’ and subjected to a ‘performance regime’.

This study has identified systemic failure to achieve key attributes of the model’s minimum standards, including tasking, co-ordination and briefing capability; the absence of standardised and integrated intelligence system; and failure to generate and exploit intelligence products (NCPE, 2005: 6-10). These deficiencies account for a significant degree of non-compliance and result in limited parity of process with potential partners, including the police. Therefore, with limited conformity the benefits of the model are difficult to test, and without standardised investigative process, the NIM is unlikely to deliver performance improvement, nor act as a facilitator for productive partnership. It
raises an issue whether ‘partial compliance or conformity’; ‘observance in principle’; or ‘selective employment’ of the model can deliver any dividends in investigative efficiency and fraud reduction. Arguably it may, the public service investigators now appear marginally more ‘intelligence-led’, and the Intelligence Units, although unpopular, provide governance and routinely provide supplementary information and intelligence that, in the IPS and DWP, accompany pre-selected referrals to be investigated. The widespread use of the ‘5x5x5’ intelligence sharing system (see Appendix 4) and general compliance with the Intelligence Cycle (see Figure 1.1) is a significant improvement on traditional methods. The employment of trained analysts in both the IPS and DWP has increased the quality of intelligence refinement and product and their services continue to be exploited by both managers and investigators. However, it should be qualified that these improvements remain marginal and the full potential and advantages of consistency of process and productive partnership are not being progressed by partial and selective conformity to the NIM Guidance.

**Alternative intelligence-led investigation processes**

It is proposed that any complementary alternative to the NIM must employ and act in accord with the latest version of the Intelligence Cycle (see Figure 1.1) the components of the cycle being direction, collection, collation, evaluation, analysis and dissemination (ACPO, 2008: 11) as it provides established, although controversial; good practice. The cycle is broadly compatible with established public service practice regarding probity and integrity - accounting for organisational sensitivities surrounding the collection and ‘mining’ of personal data. It therefore regulates and provides a cyclical process to a critical element of intelligence-led investigation and, from the research findings, would be familiar to public service investigators and intelligence officers. Any alternative process should also continue to use the intelligence sharing system of ‘5x5x5’ (see Appendix 4), again familiar to, and systematically employed across, the investigative network. A simplified investigation process for public services should acknowledge a highly focused investigative methodology, essentially focused on fraud reduction, whilst endeavouring to augment that same process with an intelligence-led foundation. The ‘asset requirements’ for an alternative intelligence process should accord with public service ‘assets’ already in place. For a lawful and referral-driven intelligence-led investigation team, they should include: trained investigators, intelligence officers and a crime analysts (*people*); secure intelligence and storage (*system*); knowing the business, the law and regulation relating to
investigation (*knowledge*); and having an operational intelligence unit (*source*). Finally, to preserve complementary parlance when engaged in productive joint working, ‘intelligence-led decision making’ should preserve the ‘*tasking and co-ordinating*’ process – although in a substantially simplified format and a process that acknowledges the factional position of public service investigation teams.

Fundamentally, the public services would benefit from improved decision making through the collection, analysis and application of intelligence and, within this basic premise, it demands a simplified intelligence process accessible to the public services. However, a degree of flexibility would be necessary as any alternative process would need to accommodate the reality that established public service Operational Intelligence Units (OIU) work quite differently from the police, neighbouring (and sometimes even associated) agencies. The public service OIUs are subject to different policy and procedure that provide mandatory organisational restrictions and regulations upon their activities and capacities. In addition, agency investigative communities have limited operational resources, and although the investigators are generally trained and accredited, almost without exception, they generally carry a very high reactive workload (occasionally over 50 live cases) – providing limited capacity for proactive work. As previously mentioned, most agencies have an extreme focus of criminal investigations in comparison to the police (predominantly identity or financial-based fraud) and, as such, the concept of ‘selecting’ from a broad range of volume criminality, having no relevance, has been omitted. I would argue that any public service intelligence process should condense and simplify the intelligence process, complementing the NIM as used by the police, whilst avoiding operational tension by agency staff through direct association with that model. It needs to deliver a substantial degree of compatibility with the NIM if commonality, and an acceptable level of standardisation, is to be achieved between a public service investigator and a police or SOCA investigator using the NIM. Any alternative intelligence-led investigation process would not be compulsory or mandatory, its attraction to non-police managers and operational personnel would have to rely on providing clear and impartial direction to facilitate intelligence-led investigation, decision making and productive partnership.

A proposed process, incorporating the aforementioned considerations - the Public Service Intelligence Process (PSIP): see Appendix 6 - has been included as a discussion document.
It is deliberately simplistic, to accommodate the variations of process within each of the public services, although it acknowledges some commonality between agencies. The PSIP and ‘guidance’ have only received limited circulation to 14 investigative staff within the DWP, IPS and DSA who had been previously interviewed and expressed a willingness to ‘help further’. It was circulated with a simple request for the subjects to undertake a preliminary review to determine its compatibility with their extant processes and whether they believed it was an improvement on the ‘revised NIM minimum standards’ they had previously read. The PSIP has not been subject to any operational trial or pilot within the public services under review. Without exception, all of the comments were positive, although two Investigation Managers stated they were uncertain whether their respective agencies would be willing to ‘change again’ and deviate from ‘cosmetically pursuing the NIM’ (RS18). No revisions were tendered by the reviewers, other than a minor editorial error, which has now been amended, and the general response indicated that the language employed and the description of process were clear and unambiguous. One IPS investigator stated: ‘it is about time we had a model that we could follow’ (RS42) and again, this was a common theme. Without a formal operational trial, this proposed process remains untested and, potentially, just an academic response to this research, however it may provide stimulus for further study and the identification of a suitable alternative to the NIM for public services.

**Summary**

The findings from this research illustrate that the NIM is not a ‘comfortable fit’ for non-police public services. The provenance and foundation of the model – intelligence-led policing – has a relatively broad appeal to investigative communities, but the NIM exceeds this core philosophy and represents an effective business model for law enforcement agencies. With a few notable exceptions, e.g. SOCA, public services do not have ‘law enforcement’ as their core business and this has generated conflict and a tension in a minority and factionalised intelligence community within non-police agencies. The potential impact and value of the NIM is intended to contribute to the broad spectrum of police business relating to community safety; in contrast, the limited public service demand, in a minority department, is dominated by fraud investigation and reduction.

The minimum standards of the model, which provide the criteria for (police) compliance and (public service) conformity, are substantial and appear relatively inflexible (ACPO,
2005: 101). In addition, and as result of this research, I would argue that for public service managers and investigators, unfamiliar with police terms, the description of the NIM and the supplementary minimum standards are potentially complex and confusing. The language adopted outlining the model’s requirements appear sophisticated and specialised, potentially defying common comprehension and thereby contributing to ‘adaptation’ and alternative ‘versions’ of processes, potentially unrelated to the NIM. It is further argued that, should the description of any process lack clarity, particularly regarding the core components and compliance criteria, it cannot deliver consistency. In this respect, the description of the NIM together with its perceived complexity, breeds different interpretations and promotes inconsistency. The NIM may provide a cosmetic appearance of intelligence process uniformity, but this is an illusion, for in reality there it is not a national model, nor does it provide a common system of intelligence-led investigation or decision making within non-police public services. Whilst this situation prevails, the model will not fully contribute to improved intelligence-led investigation, decision making, productive partnership; or joint working and the potential beneficial outcomes of the model will not be achieved.

It is therefore proposed that the primary demand for standardisation (ACPO, 2005: 60) and consistency with the NIM (or any intelligence process), is absolute clarity of requirement and process. Within the final part of this chapter I have included considerations for an alternative process to deliver a simplified intelligence-led process. I would argue that any alternative process must potentially provide a degree of parity with the NIM, and facilitate standardisation of the core intelligence-led investigative processes. Furthermore any ‘alternative’ should take account of operational ‘user commentary’ and ‘cultural sensitivity’ – the investigative personnel within public service and the key stakeholders of organisational change. To promote further debate, I have included an example - the Public Service Intelligence Process - that offers an abridged and basic process that should be relatively undemanding and capable of being assimilated into current public service procedures.
Chapter 7: Conclusion

Introduction

This thesis provides a review of the NIM, when adopted within non-police public services and this final chapter will summarise the general findings and arguments. This will include the identified difficulties that the public services continue to experience in conforming to the NIM minimum standards; the potential reasons for continued nonconformity; and recommendations to remedy this position.

Origins, foundation and development of the NIM

The provenance of the NIM is sound, primarily based upon a range of evolving intelligence-led initiatives, including the Intelligence Cycle (Figure 1.1), initially recommended in the Baumber Report (ACPO, 1975). Following the introduction and apparent success of the Kent Police Model in 1993, its progeny, the NIM, was designed within NCIS, before being strongly sponsored by ACPO, as national policy, to the Home Office. The Kent model was subject to substantial revision including the appendage of a strategic element. It was re-engineered and re-branded to provide significantly broader focus and impact on police business. The NIM was first published in 1999 (NCIS, 2000) and with continued support from ACPO, gradually adopted by police services. With the advent of the Police Reform Act 2002 and inclusion in the National Policing Plan 2003-2006, adoption of the model was made compulsory to all 43 police forces in England and Wales by April 2004. The NIM was widely perceived as the effective synthesis and embodiment of intelligence-led investigation, fundamentally employing intelligence to influence strategic and tactical decision making and resource allocation. As an intelligence-led business model or process, compliance with the NIM is intended to provide a range of benefits for the user including: community safety, reduced crime and the control of criminality and disorder (NCPE, 2010). Critically, there was no proposal that employment of the NIM should be restricted to the police (Home Office, 2002) and in consequence a number of public services adopted it from 2004-5. The model can appear complex (Flood, 2004: 51; ACPO, 2005: 11) and the compliance criteria contained within the associated Code of Practice and minimum standards are reasonably demanding on the adoptee, to achieve a standardised intelligence-led investigation and decision making process. Police compliance is subject to an inspection regime from the HMIC, although no similar mechanism is in place for non-police users.
Research method and further research

Chapter 3 outlined the research methodology that exploited professional exposure, investigative experience and interviews with public service staff. The initial disappointment regarding the poor return on the survey provided compensation through an increased understanding of the subject group’s awareness of the NIM and an expansion of the interview sample. The choice of public services provided a good ‘spread’ engaging with a large organisation in the DWP, a moderate one in IPS and a more modest agency in the DSA. Despite some minor inconsistency in the findings, with the DSA investigators tending to have a more positive outlook, the results proved highly informative and significant. The sample was sufficient to provide theoretical saturation and to deliver evidence in identifying the key difficulties experienced by public service investigators in achieving conformity with the NIM and the minimum standards.

Background and related work

Chapter 4 reviewed the creation of the NIM as national policy and the potential influences exerted through policy transfer (Hill, 2009) on the model’s architects Messrs Flood and Gaspar within NCIS, and on the Home Office designers during its final development. The evidence is reasonably compelling, but circumstantial, that attributes of the COMPSTAT initiative, Community Policing and New Public Management featuring in the model, were as a result of ‘lessons learned’ or policy transfer. A comprehensive time line is included on pages 55-58 to illustrate potentially relevant initiatives, events or themes that may have influenced or impacted upon the fabricators of the NIM and its associated minimum standards. A review was undertaken on the origin of intelligence, and of criminal intelligence, as core ingredients of the model and this illustrated that the paradigm of ILP is based upon a long and distinguished heritage. A conclusive definitive description of criminal intelligence remains elusive, but a general view is that it is the product of processed, refined and analysed data and information.

An examination of the impact and potential benefits of the NIM and intelligence-led investigation on crime reduction suggests that direct evidence is reasonably obscure (Reiner, 2000: 123 and Tilley, 2008: 147). There is a paucity of evidence to support that the NIM has made a direct contribution to reducing crime, and this study has not identified any convincing data to suggest that it has improved agency investigators’ effectiveness in reducing fraud. From the non-police-public services investigators’ perspective, there was
heightened expectation that an effective intelligence-led process would directly contribute to fraud reduction. This may be unrealistic as Flood, (2004) proposed that the ‘core of core business’ supported by the NIM is ‘volume crime’ including the management of “volume crime – burglary, theft, vehicle crime, street robbery and the like” (Flood, ibid: 46). He further suggests that volume crime is so extensive and of such importance that it needs to be made “susceptible to a knowledge-based attack if there is any hope of bringing under control” (Flood, ibid: 46). This may have limited appeal in addressing the refined and marginal demands of a minority investigative community dominated by fraud referrals – for them an exclusive ‘volume crime’. These investigators operate in a less tolerant and more thinly resourced environment than the police and agency senior managers may view the NIM as offering limited advantage to the majority of the agency’s business. From the public service investigators’ viewpoint, in the absence of clear advantage to referral management processes and investigation, potentially due to a shortage of ‘assets’ (resources); perceived disempowerment; and a clear decision making process, the NIM may be viewed sceptically and even with some suspicion. This apprehension was potentially fuelled by a poorly contrived implementation process that was common to both the DWP and IPS, although it was evidently better managed for the DSA with consultation and good operational awareness manifested by senior managers of the compliance criteria.

From testimony and review it was evident that the DWP and IPS did not engage in a comprehensive change programme, or provide significant investment to support the adoption of the NIM. Both of these agencies apparently synchronised the NIM adoption with a number of process and procedural changes to ‘referral selection’, scoring and governance – not directly related to the model. The resultant collision with the investigators culture generated a level of mistrust regarding the motives and purpose of the NIM, this legacy has perpetuated a degree of division and non-cooperation with the intelligence units, resulting in serial non-engagement with the core doctrines of the model.

The research
This research illustrated that the public service investigative staff significantly misunderstood the compliance requirements of the NIM and the ‘Guidance’, whilst harbouring some suspicion regarding its purpose. The findings indicated that the model is perceived, by a substantial proportion of the operational staff, as a governance and performance tool; a negative change agent designed to restrict investigators power and
discretion; and the inappropriate and unproductive imposition of a police model. These perceptions are not true reflection of the NIM, although they appear a reality to the subjects and, regardless of real or perceived shortcomings, it would be worth considering the adage ‘all models are wrong, some models are useful’ (Box, 2006). It was also evident that the introduction of the NIM was not subject to a methodical change programme in the three agencies reviewed and that this may have contributed to the negative reception and further frustrated compliance. The NIM minimum standards are complex in both their format and terminology, perhaps unnecessarily so from the viewpoint of public services, but the model’s central themes are sound: exploiting intelligence to direct investigation, decision making and tasking (taking the guess work out of it)! It was not poorly contrived and the architects appeared to have designed an adequate intelligence model for police use – the additions to the Kent model attempting to provide a ‘general application’, appears to have been a later appendage either within NCIS or the Home Office.

The research revealed that there continues to be a very limited understanding within the public services of the core purpose of the NIM beyond relatively rudimentary concepts such as the Intelligence Cycle and the 5x5x5 (Appendix 5). There appears to be little comprehension of the ‘Guidance’ or the minimum standard criteria, contributing to nonconformity. The majority of subjects reported that the NIM appeared to have only marginal impact on counter-fraud activity. When questioned regarding the impact that the NIM had on investigation, the significant majority (74%) of respondents stated they were unable to determine any increase in efficiency or effectiveness. There was a close, and potentially inaccurate, perception that the intelligence units – imposing a variation to traditional referral selection and intelligence gathering – were initiated for the purpose of regulation, disempowerment and governance of the investigators. A further common perception appeared to align the NIM with procedural changes relating to scoring (the de-selection of referrals for investigation) and restrictive practices on intelligence gathering. This demonstrated broad unfamiliarity with the model’s purpose, standards and compliance criteria, despite its five years legacy and complementary training. This review identified little evidence to suggest that the NIM had supported or increased joint working through partnership, although there was a perception that it should, drawing from media-based knowledge of CDRP. There is only partial consistency or parity of investigative process between the different agencies and a limited appetite for collaborative working, particularly with the police or SOCA. A critical and relatively consistent complaint from
the investigative staff was that the NIM was too complex; incomprehensible and partial to the police and was not considered suitable or appropriate for the public service. However, this perception should be countered with the significant naivety of the model and standards manifested through interview responses and process review (see pp. 88-91 and responses by subjects RS07, RS11, RS15, RS25, RS28, RS31 and RS43)

Addressing public service nonconformity

This research has established that the current level of compliance with the NIM or conformity to the minimum standards within the DWP, IPS and, to a lesser extent, the DSA, is unlikely to deliver substantial benefit to investigation or fraud reduction. Chapter 6 reviewed the research findings and identified significant contributory factors to the non-compliance by these investigative teams and, primarily, this relates to a limited familiarity and understanding of the model and compliance criteria, possibly as a consequence of the complexity and language employed in the model’s supporting literature. In addition, and possibly as a consequence, there are incongruent inter-agency processes and procedures, potentially conflicting with the NIM minimum standards; insufficient investment in the required assets in some teams and units, resulting in inadequate resources; and cultural resistance from the operational investigators. An attempt was made to address the issue of complexity and police-terminology by modifying the NIM minimum standards (Appendix 3) and, through editorial revision, sanitising and simplifying the requirements for conformity, endeavouring to provide a simpler explanation and description of the model. These were circulated to the majority (85%) of the research population to evaluate whether this abridged version of the compliance criteria would improve their comprehension. The revision attracted positive comment from the majority of reviewers (66%) suggesting that it was appreciably more concise and delivered greater clarity. However, it was still perceived as too complex and failed to address the perception that the NIM was not suited to the public services.

The research indicated that for an investigation model to work and deliver a convincing ‘national model’ of intelligence-led investigation it must be comprehensible and accessible to, and potentially compatible with, all agencies employing investigators. It should deliver clear business benefits to the subscribers, regardless of their core business. Adoption of the NIM ‘in name only’ or partial compliance with a, perceived, ‘police model’, due to its relative unsuitability to public service and investigation systems, cannot facilitate
consistency and is therefore, unlikely to fuel and expand productive collaborative working and intelligence sharing. It is argued that whilst the complexities of the model and its ‘Guidance’ are misunderstood, conformity and the desired consistency and commonality will not be achieved. The consequence of this will be the current state; a variety of intelligence-led processes purporting to follow the NIM, but in reality representing a number of quite different versions. The continuing lack of investment in the NIM by public services appears to be a product of this misunderstanding, combined with genuine organisational deficiencies in the resources necessary to provision the model’s asset requirements. Similarly, the identified cultural opposition may also correlate to lack of resources and the continuing naivety of operational staff regarding the purpose, processes and compliance obligations of the NIM. However, this resistance may have been compounded by unrelated changes in organisational structures and mechanisms.

In response to the research findings I would argue that further revision and editorial of the NIM minimum standards would be unlikely to succeed in delivering the necessary simplicity and clarity required by public service managers and operational personnel. It is possible that a complete and thorough translation of the NIM, Code of Practice and minimum standards, going substantially beyond the limit of my own revision (Appendix 3), could deliver a simpler guidance for the public service. However, remaining faithful to the current NIM configuration, it would not reduce the necessary asset demands to resource intelligence-led investigation and decision making, nor the procedural requirements associated with tasking and co-ordination. Critically, even with extremely basic and abridged descriptions and standards, it would remain the ‘National Intelligence Model’ and, I would argue, not overcome the resistance that it is perceived as a model ‘designed by the police, for the police’. Similarly, comprehensive briefing and education for investigative staff, managers and senior policy makers within agencies to interpret, explain and provide public service comparisons (where possible) to the compliance requirements, may address some of the misconceptions and cultural resistance, but this training would be costly and need to be highly standardised to ensure consistency of delivery and objective.

I would further argue that cultural resistance is sustained by the notoriety of the model, within public services, associated with a potentially mismanaged introduction and an inaccurate associated with unrelated organisational change; and that this would not be
remedied by simplified guidance or further training. It is therefore proposed that a complementary alternative to the NIM should be identified for non-police public services and the general factors were outlined in Chapter 6. This alternative should be a simple intelligence-led investigation process, retaining its adherence to the Intelligence Cycle (see Figure 1.1) and continuing to employ the 5x5x5 intelligence sharing system (Appendix 4) – both of which are familiar to the agency investigative community. It is argued that this alternative process should accommodate some flexibility, acknowledging the different organisations, businesses and investigative resources available throughout the public service. It is further proposed that any alternative would need to condense and simplify the intelligence-led processes, complementing the NIM as used by the police, whilst avoiding operational tension by agency staff through direct association with that model. A proposed process, incorporating the aforementioned considerations - the Public Service Intelligence Process (PSIP): see Appendix 6 - has been included as a discussion document.

Summary
On the basis of this research, I would argue that the police-partiality of the NIM substantially restricts its broader productive employment into the public service and that the perceived complexity of the minimum standards may defy conformity with the model’s ‘Guidance’. It is further argued that the concept of intelligence-led investigation is sound and improved decision making, through tasking and co-ordinating, would deliver benefit in reducing fraud and facilitating improved partnership. Sadly, even within the police service, the NIM does not appear to have delivered a radical change to investigative practice and resource distribution (James, 201: 256). Whilst in the police, emphasis on compliance may have diluted potential benefit, within the public service conformity to the NIM ‘Guidance’ is irregular and inconsistent frustrated by inadequate assets; cultural resistance; and incomprehension. To promulgate what was, essentially, a police model to other organisations was fraught from the outset and the conflict and difficulties in assimilation were potentially predictable. Acknowledging this and demonstrating a willingness and activity to remedy the current inconsistencies could still deliver the desired improvements to investigative practice and productive partnership.

As a result of this research, I have proposed a limited number of recommendations in Appendix 7. For future study, I intend to expand this review to include additional public services with an investigative capability, particularly Her Majesty’s Revenue and Customs
and National Health Service, broadening the research sample to test the current findings against a wider investigative population. The concept of a discrete ‘intelligence-led process’ for non-police public services, potentially providing a complementary alternative to the NIM, requires further review, debate and greater operational exposure to assess its viability.
## Relationship between research aims and objectives

<table>
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<tr>
<th>Aims</th>
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| 1    | Assess the relevance and accessibility of the NIM, as a business model to non-police public services | 1. Undertake research of official documents and literature.  
2. Interview operational investigation staff within public services, police and SOCA personnel.  
3. Undertake secondary research in published research, literature and biographies. | 1, 2, 4, 5 and 6          | RS01, RS04, RS08, RS09, RS11, RS14, RS17, RS22, RS31, RS36, RS41 and RS46 |
| 2    | Establish the level of compliance with the NIM, Code of Practice and minimum standards by public service investigative teams. | 1. Review public service documents and published literature.  
2. Interview operational investigators within public service, the police and SOCA.  
3. Analyse that data to identify the level of compliance with the NIM ‘Guidance’. | 5 and 6                   | RS03, RS06, RS09, RS15, RS19, RS21, RS22, RS25, RS47, RS31, RS42, RS45 and RS46 |
| 3    | Identify the specific areas of non-compliance and assess its impact on intelligence-led investigation, decision making and partnership. | 1. Interview public service operational personnel to identify specific areas of non-compliance to include ‘assets’ ad procedures.  
2. Comparatively evaluate the current NIM processes within the police and SOCA with public services to identify differences  
3. Interview public service managers and investigator and review agency literature to establish the impact of the NIM on investigative processes, decision making relating to tasking and co-ordination and partnership. | 4, 5 and 6                | RS01, RS02, RS07, RS09, RS16, RS18, RS19 RS20, RS21, RS25, RS31, RS34, RS45 and RS47 |
| 4    | Identify and evaluate the causes for non-compliance with regards to the model’s asset requirements, process and procedural change and cultural resistance. | 1. Undertake research of official documents including archived data regarding the introduction of the NIM to agencies.  
2. Interview public service operational personnel to establish cultural barriers to compliance with the NIM.  
3. Through interview and review of literature assess comprehension and understanding of the key compliance requirements for the model. | 2, 4, 5 and 6             | RS09, RS13, RS17, RS18, RS23, RS24, RS25, RS28 RS30 RS33, RS34, RS35, RS37, RS38, RS42 and RS45 |
| 5    | Assess whether a revised edition of the NIM minimum standards will improve the comprehension and understanding of the public service investigation teams. | 1. Generate a revised version of the NIM minimum standards: sanitised and summarised to evaluate whether this supports improved understanding of the compliance criteria.  
2. Comparatively evaluate the revised standards with the current ACPO version to ensure it retains faithful to ethos and model.  
3. Circulate the revised standards and invite feedback; evaluate and report. | 5, 6 and Appendix 3        | RS02, RS07, RS09, RS10, RS13, RS16, RS18 RS21, RS24, RS37, RS41 and RS46 |
| 6    | Propose any potential remedies to non-compliance with the NIM. | 1. Review the findings and critically analyse the data and evaluate possible remedies.  
2. Propose appropriate remedies, if identified. | 5 and 6 and Appendix A6.1  |                                                                      |
Consultancy and Training activity within Public Service since 1996

1996 – 1999       Experience – Metropolitan Police Service (MPS)

Nick Osborn was a training and quality manager within Specialist Operations for 3 years. In addition, he managed the delivery of criminal intelligence and analysis training for the MPS Criminal Intelligence Directorate and Covert Policing (SO11 and SO10). Working with the Head of Profession, he was the project lead for the Professional Development Programme for analysts, within the MPS.

1999-2001 (retired)       Experience

Nick Osborn continued with the Metropolitan Police Service and engaged in a number of special projects, working in partnership mainstream policing, and with the security services.

Public Service Consultancy has included (since 2001) to date:

- Child Support Agency; investigation training and management development – accredited training; process review and security consultancy
- City of London Police: sundry courses, currently the Counter Fraud programme in liaison with the NFA and TROY.
- CRB: process review; ACFS design and delivery
- DEFRA: management development including security, probity and integrity of systems
- DSA: ACFS and PinS 17 equivalent (criminal Analyst Foundation Programme)
- DWP (PinS 6, PinS 6M, PinS 17, PinS 17A, PinS 24 design, accreditation and delivery); Change programme as Lead External Consultant; NIM integration; consultancy reviews of policy and process; Lead Consultant to Security Committee, etc.
- Forensic Science Service: designed and delivered the accredited ‘Aspiring Leaders Programme’ for middle and executive managers; portfolio delivery for operational staff regarding integrity of evidence and systems.
- Home Office: CSAS, DDO and PCSO.
- Home Office: Professional Needs Analysis (and TNA) for Designated Detention Officers; leadership and the management development programme for Police Services (PRDLDP).
- Independent Police Complaint Commission (IPCC): pre-employment assessment for Investigative Managers (supplement to Investigative Managers Development
Programme: Investigators, DSI and SI accredited development programme through EdExcel

- IPS (formerly the United Kingdom Passport Service): Organisational Development (FIU restructure); Operations Management, and Joint and Collaborative Management; Policy and Procedural review; MIT and OIU External Project Lead; ACFS design and delivery to operational investigators.

- Jobcentre Plus (DWP): Risk Management Unit, London Region (Criminal Analysis, SIO and OIU); NW Region (Model OIU and Inspection); Change Team (introduction of NIM, Risk Management and control mechanisms and Analyst Development Programme (Risk Identification and Intelligence Application).

- Local Authorities (most of them): PinS Programme for Housing Benefit investigators and managers; sundry security and investigation programmes, including the accredited Street Wardens Programme; Licensing Officers and Street Enforcement Officers training (WCC)

- MPS: Executive Leadership Programme and Partnership Programme

- NAFN: consultancy on policy and process relating to LA interface and joint working; all PinS, analyst, intelligence officers and managers training.

- Pension Service (DWP): PinS Programme and Business Analysis

- SOCA: Systems, policy, process and management development

**Academic Qualifications**

- MSc – Decision Making (in Management) London Guildhall University
- Post Graduate Diploma: Decision Making City of London Polytechnic
- Post Graduate Certificate of Education (FE II) University of Greenwich
- Accredited Counter Fraud Specialist (ACFS) University of Portsmouth

**Other Professional Qualifications and Memberships**

- Associated Institute of Bankers Examination (Bromley College of Further Education)
- A1 NVQ Assessor (City & Guilds)
- Fellow of the Chartered Management Institute: Registration: 000445147 (FCMI)
- Fellow of the Institute of Leadership & Management: Registration. 110027 (FInstLM)
- Member of the International Association of Chartered Analysts (MIACA)
- Member of the Institute of Counter Fraud Specialists (MICFS)
- Member of the Institute of Management Services (MIMS): Registration. 43085
- Life Member of the Society for Certified Criminal Analysts (MSCCA)
National Intelligence Model:
revised Minimum Standards for public services

ELEMENT 1: KNOWLEDGE ASSETS

1. CURRENT LEGISLATION AND CASE LAW

A public service with an investigative capacity will ensure that its designated intelligence staff and investigators remain informed of legislation and case law developments – having ready access to current information sources. A professional public service will ensure that its investigative staff remain fully informed of legislation, case law developments and guidance, and that they have ready access to up-to-date information sources on a round the clock basis. Where available, ‘Practice Advice’ documents should be provided for intelligence and investigative staff, these provide details of good practice; suggest operational methods and structures to provide a further basis for the delivery of training.

Meeting the Criteria
There must be continual access to a knowledge repository (locally, centrally, or electronically) and it must cover all areas of investigative activity, for example:

- Crime
- Community
- Various private legal databases, details of which can be found in Appendix 3 or through the Office of Public Sector information http://www.opsi.gov.uk

Ensure access to, and an understanding of, Practice Advice documentation where available and relevant. For example, practice advice on NIM, and anti-corruption. Access can be locally or centrally available, or made available electronically through thru use of systems such as the intranet.

2. CODES OF PRACTICE AND SECONDARY LEGISLATION

A code of practice under the Police Act 1996 is a statutory document which provides a high level strategic framework and principles enabling the development of detailed guidance and practice advice. Some codes of practice are in the form of secondary legislation, providing mandatory compliance, e.g., the Police and Criminal Evidence Act 1984 (PACE).

Meeting the Criteria
There should be ready access to a knowledge source (locally, centrally or nationally) that cover all areas of investigative activity, to include:

**ACPO and Home Office Guidance:**

- NIM;
- RIPA;
- CPIA;
- PACE;
- DPA;
- Criminal Records Bureau (CRB);
- PNC;
- Any future or proposed associated codes of practice and secondary legislation.
- ACPO Practice Advice On Resources And The People Assets Of NIM
- ACPO Anti-Corruption Advisory Group (Vetting Protocol Of Intelligence Staff)
- ACPO Guidance On The National Briefing Model
- ACPO Codes Of Practice On The Management Of Police Information
- ACPO Guidance On The Management Of Police Information
- ACPO HMR Memorandum Of Understanding Disclosure Of Information
- ACPO Practice Advice On Tasking And Co-Ordination
- Home Office Codes Of Practice For The Use Of The Serious Crime Analysis Section
- ACPO And HMRC Manual Of Standards For Covert Human Intelligence Sources
  - ACPO Practice Advice On Prison Intelligence And Related Matters
- ACPO and HMRC Manual Of Standards For The Deployment Of Test Purchases And Decoy Officers
- ACPO and HMRC Manual Of Standards For The Deployment Of Undercover Officers
- ACPO/ACPOS/HMC Manual Of Standards For Accessing Communication Data
- ACPO/HMC National Standards In Covert Investigations Manual Of Standards And Surveillance
- ACPO Deployment Standards For Technical Support In Tackling Volume Crime
- ACPO Guidance On The National Briefing Model
- ACPO Major Incident Room Standardised Administrative Procedures Manual
- ACPO PNC Compliance Strategy
- ACPO Code Of Practice For Data Protection
3. MANUALS OF GUIDANCE

A manual of guidance describing the standards and subsequent compliance required by forces or law enforcement agencies in respect of various policing activities, for example the collection storage and application of Intel. This enables effective compliance within a legal framework, and provides a basis for an established minimum competence requirement.

Meeting the Criteria
Ensure access to, and an understanding of, standards in respect of relevant subjects, for example: NIM, data communications SPOC, dangerous offenders, priority and prolific offenders, prison intelligence, covert operations and the ANPR system.

4. PUBLIC SERVICE POLICY RELEVANT TO INTELLIGENCE

Individual service policies on intelligence must complement minimum standards and practice advice, while further establishing NIM into everyday policing.

Meeting the Criteria
The following should be in place and adhered to:
- Intelligence Strategy;
- Forensic Policy;
- Tasking & Co-ordinating Group Policy.

5. PUBLIC SERVICE NIM COMMUNICATIONS STRATEGY

The development and implementation of a marketing and communications strategy designed to promulgate the benefits of intelligence-led investigation, both internally and externally to the service, is fundamental to the successful implementation and further development of NIM.

Meeting the Criteria
There must be a method in place, such as the intranet, for communicating a standard message to all investigative and intelligence staff.
6. PUBLIC SERVICE IT STRATEGY (FORCE INFORMATION STRATEGY)

All service IT strategies relating to investigations and potential crime ‘referrals’ should include issues relating to the support and maintenance of intelligence IT structures. This will ensure the continual employment of intelligence–led investigating.

**Meeting the Criteria**
The investigation and security departments must maintain an IT strategy and infrastructure capable of sustaining intelligence-led investigating.

7. I.T. DISSEMINATION OF T&CG ACTIONS

Effective management of the T&CG process includes providing an appropriate means of ensuring tasks are carried out and monitored.

**Meeting the Criteria**
An agreed dissemination system should be in place to disseminate strategic and tactical T&CG decisions to investigative staff and to confirm that all the necessary actions have been carried out and recorded. Dissemination must take security into account and the content may be reduced, particularly at Level 2. Access must be restricted to nominated staff only, and good practice identified.

8. PUBLIC SERVICE INVESTIGATIVE STAFF TRAINING STRATEGY

Investigative and intelligence staff should receive appropriate training to support their knowledge and competence to program intelligence-led investigations through the NIM.

**Meeting the Criteria**
A service training strategy should be in place covering explanations of NIM and the processes involved in gathering and submitting intelligence. It should emphasise the importance of intelligence submissions, and the fact that such submissions are especially important from staff in roles outside of the intelligence function.
ELEMENT 2- SYSTEM ASSETS

9. SECURITY
Access to and from vulnerable areas must be monitored and controlled. Intelligence and investigation material, documentation and products must be managed in a secure manner. All investigative staff should be aware of, and comply with, the requirements under the CPIA to maintain the integrity of the intelligence gathering and investigation. In addition, investigative staff should exercise duty of care and the protection of intelligence gathering and investigative products; observing the principles and established good practice that must be adhered to in the investigation of criminals and criminality.

Meeting the Criteria
Within investigation and security departments a ‘clear desk policy’ and secure file storage systems must be in place, located within a secure accommodation or with limited access. Public services should ensure that access policies are in place that enable qualified staff to gain entry to secure environments. Services must ensure source protection and confidentiality both internally and externally in information sharing and the dissemination of intelligence.

10. SECURITY POLICIES RE: INTEGRITY, CONFIDENTIALITY AND VETTING STANDARDS WITHIN INTELLIGENCE WORK

Those individuals working within secure environments must be subject to clearance themselves. The manner in which material is recorded, disseminated and retained should also be the subject of security policy.

11. EFFECTIVE BRIEFINGS AND DEBRIEFINGS

All investigating and intelligence staff should be fully briefed and continually informed of all tasking and intelligence requirements. Debriefing is also vitally important in maintaining the cycle of information.

Meeting the Criteria
Intelligence must be fed back to the intelligence unit and dedicated briefing facilities, structures and processes must be established in all areas of activity. For further information see ACPO Guidance on the National Briefing Model.
12. INTER-AGENCY INFORMATION SHARING PROTOCOLS

Information management and the provision of protocols, standard operating procedures and MOU’s between agencies are essential to the efficient investigation and complement the NIM. The ACPO (2005) Code of Practice on the Management of Police Information and ACPO Guidance on the Management of Police Information provides information and good practice on such protocols at a national and international level. The integrity of any intelligence system relies on ethical processes and legislative compliance.

The DPA, ACPO (2000) PNC Compliance Strategy, ACPO (2002) Code of Practice For Data Protection and the ACPO Guidance On The Management Of Police Information provide minimum requirements for access to, and the retention and deletion of, information. All storage of information must be subject to the appropriate security measures. There must be an organisational information access, retention, review and security policy in place. Nominated Data (Protection) Officers will proactively and intrusively supervise compliance through thematic testing. All data systems should be subject to intrusive and proactive management supervision and quality assurance protocols.

Senior security managers and the designated intelligence managers should fully understand intelligence products and the analytical process. In addition to data access agreements, protocols between law enforcement agencies and partners must be established with respect to the dissemination of information and intelligence material.

Published control strategies should be used as a basis for prioritising data input and research. Other issues may take precedence, providing their tasking is subject to control mechanisms.

USE OF 5X5X5 AS STANDARD EVALUATION

The National Information/Intelligence Report Form 5x5x5 is the only system recognised nationwide for the recording, evaluation and dissemination of information into the intelligence system. The ability of staff to have ready access to data input systems, in order to record information, will enhance intelligence collection.

Meeting of the Criteria

Examples of inter-agency information sharing protocols include:

CDRP;
Wider crime reduction partnership community protocols at both local (level 1 and 2) and regional (level 2 and 3) levels;
Section 115 of the CDA, which provides a statutory gateway for information sharing for crime and disorder purposes.

There must be a policy and resources in place to enable hot intelligence assignments, human rights compliance, risk assessment and duty of care considerations. The Agency’s control strategies should be evident to all investigative, security and process staff and be seen to drive prioritised input and research into reducing, loss, error and risk, e.g. fraud. The Agency should have data quality assurance protocols in place to ensure high data standards. These protocols should include defined review processes with respect to the maintenance of up-to-date intelligence records, file tracking and audit trails’. Due consideration must be given to other related NIM standards and practice advice, for example the designation of Data (Protection) Officers.

Evidence of the 5x5x5 system being used in line with the ACPO Guidance on the Management of Police Information. There should also be evidence of training for investigators in respect of the 5x5x5 process, including evaluation and risk assessment (by the intelligence function) of submitted information.

13. STANDARDISED AND INTEGRATED INTELLIGENCE DATABASE

Public Services should seek to ensure the integration of process information and intelligence systems to provide a reliable framework for quality data management and analysis.

Meeting the Criteria
Partner agency information/data may be included in accordance with agreed protocols, thereby assisting risk reduction and security planning. Being a member of a data warehousing consortia together with other regional partners enables the search and retrieval of information across organisational boundaries.
14. AUTHORITIES PROCESSES AND DOCUMENT MANAGEMENT SYSTEMS IN PLACE

Public services would benefit from an auditable and secure authority and management system to support compliance with legislation such as HRA, CPIA and RIPA.

Meeting the Criteria
Public Services should have a case and/or document management and file tracking systems that facilitate the auditing of paper systems and authorities (electronic or paper system to show history of input and access, dates, owners, authority).

IMPACTS AND BENEFITS

The impacts and benefits of meeting all of the minimum standards related to the system assets element of NIM are outlined below.

Public Service Policy and Procedure for System Assets

The establishment of policies and procedures in line with minimum standards will facilitate public services to undertake internal checks against agreed national and local standards, and to give better value for money including reducing cost and bureaucracy.

Security and Integrity

Implementing the minimum standards regarding security and integrity will provide improved protection of intelligence assets. Personnel vetting and the establishment of sterile corridors and clear desk policies will embed a ‘need to know’ culture.

Research Analysis

An efficient and timely research capability giving immediate and direct access to information enables informed operational risk assessments and appropriate action to be taken. It also provides reassurance to front line staff.

Improved access to data through the use of standard products for intelligence and analytical functions leads to greater efficiency and effective use of resources.
Information Management

Adherence to both NIM and information management standards (in terms of intelligence databases and authorities processes) creates a more competent platform when accessing and sharing data with partners. This, in turn, improves the flow of information and data sharing. It also improves cross-border search ability and enables remote access to systems. Compliance with the NIM will assist in providing an efficient, intelligence-led, response service.

Information Technology Policy

An information systems strategy to underpin police force and local core business processes is at the heart of NIM. Essential data must be safeguarded. In the event of a system failure, this strategy will clearly demonstrate the measures to be taken to ensure the continuity of information management during any recovery period.

ELEMENT 3-SOURCE ASSETS

15. VICTIMS AND WITNESSES

Victims of crime and witnesses to crime are vital sources of intelligence. The ability to identify repeat victims; vulnerable persons, areas of criminal activity and categories of crime provide important sources of information for the NIM process.

Meeting the Criteria

Where possible, intelligence should be secured from victims/witnesses who have been the subject of offences that fall within the control strategy or who have witnessed such offences. The details obtained from them must be reported to the investigation and security departments. A public service policy should be implemented locally to engage intelligence interviews with victims, particularly with regard to impersonation, loss or fraud. These interviews must be subject to risk assessment and conducted with the knowledge and sanction of a senior investigator or manager.

16. UNDERCOVER/TEST PURCHASE OPERATIVES

All ‘covert activity and test purchases should be subject to risk assessment and require management authority. Established good practice should be adhered to, for further information see ACPO and HMCE (2003) Manual of Standards for the Deployment of Test Purchase and


Meeting the Criteria

Information or intelligence obtained from covert deployments should be subject to public service policy and management authorisation. Limited access to such products is necessary and they should exclusively be recorded onto the intelligence or investigation recording systems. It is recommended that a sterile corridor processes be considered at the time of exchange of material between covert units and the investigation or security department, including the sanitisation of information reports. Access to covert units and their products must be through defined gateways. Covert deployments will be in line with agreed control strategy priorities. Policy logs must be maintained and full risk assessments evident for all stages of the deployment, acquisition and exchange of information.

17. FORENSIC DATA AND FORENSIC INTELLIGENCE POLICY

The incorporation of forensic sources of information or intelligence enhances the investigative (and NIM) processes and may provide a fuller picture of criminal behaviour and patterns. Public services should consider having clear policies in place with regards to the handling of exhibits and access to specialist forensic examination. Investigators should be aware of established good practice to ensure the continuity of evidence and to avoid contamination of samples and evidential materials.

Meeting the Criteria

Established public service policies and procedures relating to forensic examination access; the maintenance of evidential integrity; appropriate training and evidence of auditable ‘good practice’ by investigative staff.
18. OTHER SERVICE/AGENCY TASKING

Sources of information are available from a wide variety of other agencies and law enforcement bodies and should be accessed and used where appropriate.

**Meeting the Criteria**

Measures must be in place to identify and use external source opportunities, collaborative working and partnership to enable tasking and access of investigative products through agreed gateways.

**IMPACTS AND BENEFITS**

The impacts and benefits of complementing and where appropriate meeting the minimum standards related to the source assets element of NIM are outlined below.

**Multiple Sources of Information**

Adopting the stated minimum standards will ensure that information is obtained from multiple sources. Engagement with partner agencies can provide a vast source of information and data relating to community issues which have previously been under-used.

Assets outside the scope of the individual Public Services can be realised and used to assist organisational targets and risk/loss reduction objectives.

**Ownership of Intelligence**

The minimum standards will create a culture of understanding that intelligence is everywhere and it is every police person’s job to find it and report it. Creating a minimum standard for gathering intelligence from other sources will encourage the flow of information and assist the efficiency of investigations and the NIM processes.

**Profiling**

An increased access to victims and witnesses for the purpose of intelligence interviewing will lead to enhanced profiling and the development of victimology. This will provide opportunities to realise the contributory factors of organisational vulnerability such as error, loss, fraud and related crime.
ELEMENT 4-PEOPLE ASSETS

19 TELECOMMUNICATIONS SINGLE POINT OF CONTRACT (SPOC)

Good practice (and NIM minimum standards) should encourage each public service to have a Single Point of Contact (SPOC) to manage all authorities and issues around accessing evidence or intelligence through defined communication systems. Accredited and highly trained staff should be nominated to provide a point of contact for all enquiries for established partners and external agencies.

20 INTELLIGENCE MANAGER

An intelligence manager must be of an appropriate status to be appointed. This is to ensure that experience is added to the analytical techniques and products before they are presented to the T&CG.

Meeting the Criteria
Intelligence Managers should be experienced supervisors and it would be an advantage if they had experience of the investigation or security domain. An Intelligence Manager is responsible for the intelligence function and intelligence product deliver locally.

21 ANALYTICAL CAPABILITY

The NIM requires analysis of information and data from numerous sources, thereby providing an intelligent picture of crime issues. The delivery of proven analytical products and key assessments is fundamental to the success of this model. The development of qualified and accredited analysts within the investigation or security department is a vital component of NIM can support investigations employing standardised, high quality, intelligence products.

For further information contact the National Analyst Working Group and see ACPO practice advice on tasking and co-ordination.

Meeting the Criteria
Sufficient accredited intelligence analysts must be in place to support tasking processes at both strategic and tactical levels, and in order to support the investigation of major crime. In addition to local analysts, it is highly beneficial to have centrally based analysts so that they can profile force control strategy priorities.
There must also be an analytical capability to identify series offences both locally and centrally. A process of series identification should be established to enable reporting to the TT&CG and to aid crime series forums. Minimum staff numbers should take into account force crime/incident profiles and not be prescribed.

22. INFORMATION AND INTELLIGENCE MANAGEMENT

The timely recording, dissemination and subsequent management of information and data sources are crucial to competent investigation. Compliance with legal provisions such as the DPA, PNC Codes and the ACPO (2005) Code of Practice on the Management of Police Information must be stringently adhered to in order to maintain the integrity and security of the intelligence process. This must not, however, prevent the exchange of information with partners in support of policing purposes.

Meeting the Criteria
There must be sufficient capability to evaluate, input and manage information from a wide range of sources. Data quality, consistency, timeliness of input and compliance with relevant legislation and organisational policy must be ensured. The ACPO (2005) Code of Practice on the Management of Police Information and ACPO Guidance on the Management of Police Information must be adhered to. Compliance inspections should be undertaken by the Investigations Manager that includes the security of IT and information and intelligence assets. Data protection must be seen as part of the process of information management, rather than as a separate process to NIM.

23. DEDICATED I.T SUPPORT

All organisational IT systems employed for investigation must be sufficiently robust, efficient and subject to future proofing to ensure that the necessary capacity and quality of product is achieved.

24. TT&CG ACTIONS MANAGER

This standard should be used in conjunction with ACPO Guidance on the National Briefing Model and ACPO Practice Advice on Tasking and Co-Ordination. The TT&CG actions manager role is that of an enactor. It carries responsibility for arranging the completion of TT&CG actions, including follow-up actions allocated to other managers. It may also include responsibility for managing the briefing process.
Meeting the Criteria
Public services must ensure that there is a capability, responsible for co-ordinating actions emanating from the T&CG meetings, a stated individual must be responsible for the delivery of those actions, monitoring progress and feeding back results to the T&CG and organisational memory.

ELEMENT 5 - INFORMATION SOURCES

25. OPEN AND CLOSED SOURCE DATA

Staff should be sufficiently trained, and IT must be in place, to fully exploit all available sources of data. The investigation should not be restricted to data, information or intelligence that is maintained on a single agency’s files and/or systems. The ability to research and exchange information with established partners enhances intelligence collection and will support robust investigation and risk reduction strategies. Links, associations and working partnerships should be actively sought and engaged in through established, MOU, SLA, gateways and protocols.

Meeting the Criteria
Evidence of active collaboration and working partnerships with law enforcement agencies, allied public services and appropriate partners; supported by established intelligence exchange gateways. Service Level Agreements should provide expected standards of service deliver between departments and organisations or for individual operations. Similarly a Memorandum of Understanding should set out the protocols between departments, agencies and organisations enabling effective joint working and partnership arrangements.

ELEMENT 6 INTELLIGENCE/INFORMATION RECORDING

26. PERFORMANCE MEASUREMENT

Setting performance targets against specified control strategies and intelligence collection requirements will assist in maintaining the business focus complement risk reduction and encourage the need for good quality intelligence recording.

Meeting the Criteria
There must be evidence of the development of performance measures around the collection of actionable intelligence. This should be in accordance with organisational and/or local priorities as set in the control strategy and intelligence requirement and sanctioned by the T&CG process.
ELEMENT 7 RESEARCH AND DEVELOPMENT

27. ACCESS TO TECHNICAL SUPPORT/SURVEILLANCE EQUIPMENT

The means with which to support the intelligence-led investigation process through technical support and surveillance must be available at all levels of investigating.

National standards for the procurement, deployment, training and authority processes for technical support are defined in a CD published by the former PSDB known as The Yellow Book and in ACPO (2004) Deployment Standards for Technical Support in Tackling Volume Crime. Access to technical resources and expertise held by other agencies will provide a valuable additional capability to gather intelligence and evidence.

28. SYSTEM FOR DEVELOPMENT AND REVIEW OF INTELLIGENCE COLLECTION PLANS

Processes should be developed which allow for the development and review of intelligence collection plans in line with the requirements of the T&CG and a method of reporting such actions.

Meeting the Criteria
Reviewing the progress of intelligence collection plans against tactical T&CG actions, refinement and recommendations are to be reported in the tactical assessment. Local systems enabling this standard to be achieved will be evident and reported in T&CG policy.

28. DATA COLLECTION DIRECTED AND FOCUSED ON CONTROL STRATEGY

The control strategy provides a focus for investigative activity. All available resources, both internally and externally, should be encouraged to gather intelligence and be subject to the tasking process. Any authorised intelligence collection and tasking will need to be assessed for its impact and benefits against the overall tactical and strategic direction of the agency. Intelligence products such as target and problem profiles must be subject to continual enhancement and development.

Meeting the Criteria
Agencies should be able to demonstrate that the tasking for information and data collection is focused on their respective control strategies. Exceptions to this standard can be considered
where directed by the T&CG during a major reactive enquiry. The tasking processes should be
developed for contribution by all staff and partners. A directory of assets should be recorded and
available to staff during intelligence research. Organisations should evidence the use and
development of corporate target and problem profile templates.

ELEMENT 8- INTELLIGENCE PRODUCTS

29. STRATEGIC ASSESSMENTS

Strategic assessments complement the functioning of NIM and are useful mechanisms for
identifying vulnerability and in framing risk reduction measures. Strategic assessments must be
used by the strategic T&CG to agree control strategies and intelligence requirements.

30. TACTICAL/PROBLEM PROFILES ONLY COMMISSIONED BY T&CG,
INTELLIGENCE MANAGER OR SENIOR INVESTIGATING OFFICERS IN A
MAJOR ENQUIRY

Target and problem profiles create greater clarity and definition around the respective issues of
priority, prolific and recidivist offenders or those suspected of more serious crime and priority
locations or crime types. These profiles are as relevant to serious and organised crime groups.

Target and problem profiles should, in the main, relate to the control strategy and stated
intelligence requirement. In some circumstances the commission of a serious crime or major
serial or series crime investigation fall outside of the control strategy remit. In these cases a
corporate line of authority for commissioning should be adopted.

Meeting the Criteria

These profiles should reflect NIM templates. They will be commissioned by Tactical T&CGs to
determine tactical resolutions; Strategic T&CGs to assist with greater definition prior to setting
the control strategy; or by an Intelligence/Investigation Manager, in exceptional circumstances,
for limited profiling to aid research in accordance with the control strategy. The profiles should
be self-explanatory and evidenced by debate with the T&CG chair.

31. ANALYST AS A STANDING MEMBER AT T&CG

The role of the analyst and analytical products are a fundamental part of NIM. It is
recommended that an analyst is a key member of the T&CG process. Analysts will provide
interpretation of the analysis within the intelligence products that drive the T&CG process.
ELEMENT 9: STRATEGIC AND TACTICAL TASKING AND CO-ORDINATION

32. T&CG POLICY

Tasking and co-ordination is essential to the NIM process and should be guided by Agency policy. Stakeholders and partner agencies play a key role in informing the strategic assessment and influencing strategic tasking and co-ordination process. The NIM tasking and co-ordination processes require monitoring and supervision in order to maintain standards and to ensure direction and control is meaningful. Daily management meetings, briefings and case reviews are not T&CG meeting as they are not driven by the intelligence products review.

Meeting the criteria
T&CG policy should detail the key attendees, products and timescales in line with national standards and good practice, reinforcing use of national minimum standards for strategic and tactical assessments and use as a core decision making document by command reams. Where possible and appropriate, Agencies should evidence the involvement of stakeholders in the strategic process.

33. OPERATIONAL INTELLIGENCE ASSESSMENT

Operational intelligence assessments are key to remaining focused during agreed T&CG tasking. For further information see ACPO Practice advice on tasking and co-ordination.

Meeting the Criteria
Operational intelligence assessment must take place to ensure that investigations remain focused in order to:

- Prevent mission creep;
- Identify priorities for the operation’s intelligence effort;
- Focus intelligence gathering;
- Inform resource decisions;
- Guide investigative activities;
- Verify that protocols, such as the correct authorisation, are present;
- Highlight diversification from agreed objectives;
- Aid compliance with HRA, RIPA, and other legislation.
34. JOINT AGENCY AND SPECIALIST OPERATIONS INTELLIGENCE CELLS

The formation of joint agency intelligence cells or cells set up specifically for major operations requires careful management and adherence to strict protocols. The following are common examples of joint agency and specialist intelligence cells:

- CDRP;
- Prisons, through adequate investment in prison intelligence officers;
- Immigration investigations;
- Serious crime investigations;
- National security investigations and operations.

Meeting the Criteria

A policy must be in place in police forces to enable the use of multi-agency staff in a joint intelligence cell and should include agreed data sharing protocols, governance issues and security policies. Joint agency intelligence cells usually operate from a single site, with one common purpose dictated by a control strategy.

35 SANCTION OF THE CONTROL STRATEGY

ST&CGs must sanction the control strategy and the intelligence requirement. The setting of strategic direction requires review to ensure that the appropriate of risk reduction focus is maintained.

Meeting the Criteria

Priority issues for prevention, intelligence and enforcement must be identified in the control strategy. The professional heads of the respective disciplines should be consulted and play an active role in ensuring accurate and informed strategies are set.

ST&CG provides the principle sanction of a requirement on all staff to secure intelligence to fill intelligence and knowledge gaps in line with the control strategy. This requirement must be reviewed and amended according to need, by the TT&CG.

The ST&CG must sit every 6 months with the minimum of a paper review at 3 monthly intervals. The meetings must review the control strategy and amend this as necessary, taking into account performance, effectiveness of the strategies set, emerging threats, and trends and resource capability.
ELEMENT 10-TACTICAL RESOLUTION

36. INVESTIGATE CAPABILITY

A dedicated intelligence-led investigations team is necessary to ensure effective resolution of core priorities.

Meeting the Criteria

There must be evidence of a tactical investigative capability able to meet the tasking requirements of TT&CG. Establishment numbers of such teams is not prescribed but staff must be trained to a high level on investigative skills. T&CGs must be aware of available investigative/intelligence capability to ensure there is a balance of work and tasking in accordance with the tactical menu.

ELEMENT 11-INTELLIGENCE/OPERATIONAL REVIEW

37. RESULTS ANALYSIS AND REVIEW

Results analysis is an analytical technique which can be used to inform the NIM process. It should be used to assess the success of actions endorsed by the T&CG.

Meeting the Criteria

T&CG commissioning of results analysis and operational review must be evidenced. Recommendations must be reflected in tactical assessments and operational plans and the organisational memory updated. This is particularly necessary when using technology or after a failed operation.

38. MONITOR AND REVIEW OF RIPA AUTHORITIES

The usefulness of information gained as a result of RIPA authorities will also require review, and policies will need to be in place to guide this process.

Meeting the Criteria

Agencies should undertake a proactive review of RIPA authorities and ensure that the retention policy is adhered to. This is usually a function of the person or team with responsibility for the management of authorities.
39. NATIONAL BRIEFING MODEL

In order to maximise the usefulness of harvested intelligence, effective briefings and debriefings are essential to intelligence and investigative staff. See also ACPO Guidance on the National Briefing Model.

Meeting the Criteria
A standardised and structured briefing/debriefing process, using the National Briefing Model, must be implemented. This will ensure the effective tasking and briefing of the patrol function and enable assessment of intelligence product accuracy and timeliness and also allows gap analysis to improve the product.

40. ORGANISATIONAL MEMORY & AUDIT

The evaluation of the outcomes and processes of investigating should be fed into corporate knowledge. This will improve the expertise of staff involved and lead to the reduced risk operations. In addition, a system for monitoring and reviewing tactical decisions, operational plans and results ensures that operational and intelligence tasking is compliant with the HRA. It also provides an audit trail for subsequent scrutiny.

Meeting the Criteria
Operation logs, operational reviews and case histories should all be examined. The results and analysis of this examination must be added to the organisational memory through the NIM process and in line with control strategy objectives or emerging high risk issues.

Agencies should have in place systems for recording, monitoring and reviewing tactical decisions, operational plans and results to ensure that operational and intelligence tasking is compliant with the HRA. The subsequent audit trail will then be suitable for later scrutiny by third parties.
Semi-structured Interview Protocol

Theme 1
➢ Does the (name of the public service) comply with the NIM?
➢ Do you as a (role, e.g. investigator) comply with the NIM?
➢ (If so,) In what way? (supplementary question to a closed response)
➢ (If not,) Why not? (supplementary)

Theme 2
➢ Do you believe the model impacts upon the risk of vulnerability to fraud within (name of public service)?
➢ (If so,) In what way? (supplementary)
➢ (If not,) Why not? (supplementary)

Theme 3
➢ Do you believe that the NIM impacts upon partnership and/or joint working for (name of public service)?
➢ (If so,) In what way? (supplementary)
➢ (If not,) Why do you think this is? (supplementary)

Theme 4
➢ Do you consider the NIM to be a productive business model for (name of public service)?
➢ (If so,) In what way? (supplementary)
➢ (If not,) Why not? (supplementary)

Theme 5
➢ Does the NIM impact upon your investigation efficiency and effectiveness within (name of public service)?
➢ (If so,) In what way? (supplementary)
➢ (If not,) Why not? (supplementary)

Theme 6
➢ What is your view of the revised NIM ‘Minimum Standards’?
Police National Intelligence Model 5x5x5 Grading System

A number of law enforcement agencies and the police service use the National Intelligence Model. It allows intelligence to be correctly evaluated where the original source is not made known to the recipient. It is sometimes known informally as the 5x5x5 system. The model grades the source of the intelligence by 5 letters, A to E, it evaluates the information as a score of 1 to 5 and on the same basis indicates who has access to the information (HMRC, 2009)

The 5x5x5 scheme is similar to the Admiralty (or NATO) system, but with the addition of a handling code to indicate conditions for the dissemination of the information. The Admiralty system is a 6x6 scheme. (Ratcliffe, 2008: 36)

SOURCE EVALUATION (ACPO, 2011)

A: ALWAYS RELIABLE

There is no doubt of the authenticity, trustworthiness and competence of the source, or the information is supplied by an individual who, in the past, has proved to be reliable in all instances. Examples might include technical deployments and information known directly to law enforcement officers. Information in the past has always been 100% accurate.

B: MOSTLY RELIABLE

Sources where information in the past has, in the majority of instances, proved to be reliable. Examples might include contacts and informants whose information has proved correct the vast majority of times but not enough to be graded as ‘A’

C: SOMETIMES RELIABLE

Sources where information in the past has in the majority of instances, proved unreliable. Information has in the past proved correct but the majority of times has been incorrect. Information should not be acted on without corroboration. It might also include the product of technical deployment where the quality of the recording is poor.
**D: UNRELIABLE**

Examples might include persons who have routinely proved unreliable in the past, or where there is some doubt about the authenticity, trustworthiness or competency, for example is known second or third hand.

**E: UNTESTED SOURCE**

This does not necessarily mean the information is unreliable but should nonetheless be treated with caution. Corroboration should be sought.

**EVALUATION OF INTELLIGENCE**

1: **KNOWN TO BE TRUE WITHOUT RESERVATION**

Examples might include the product of technical deployments or events witnessed by a law enforcement officer. However, special care should be taken in assuming that everything heard through the use of technical equipment is ‘A1’. Whilst it will be an accurate record of what the officer heard, the intelligence itself may still not be accurate, for example the source may be repeating hearsay or may be lying.

2: **THE INFORMATION IS KNOWN PERSONALLY TO THE SOURCE BUT IS NOT KNOWN PERSONALLY TO THE REPORTING OFFICER**

3: **THE INFORMATION IS NOT KNOWN PERSONALLY TO THE SOURCE BUT IS CORROBORATED BY INFORMATION ALREADY RECORDED.**

4: **THE INFORMATION IS NOT KNOWN PERSONALLY TO THE SOURCE AND CANNOT BE CORROBORATED IN ANY WAY.**

5: **SUSPECTED TO BE FALSE**

Action should be taken with extreme care and reliable corroboration sought. Whilst it may be desirable to record such intelligence onto the intelligence system it must be assessed for the potential risks arising from its inclusion.
HANDLING CODES

CODE 1:
Permits dissemination to other law enforcement and prosecuting agencies within EEA and EU compatible (no special conditions), for example the Serious Organised Crime Agency.

CODE 2:
Permits dissemination to UK non-prosecuting parties, e.g. credit card companies and commercial organisations. Subject to authority levels and records being maintained. Special conditions for dissemination can be endorsed.

CODE 3:
Permits dissemination to Non-EEA law enforcement agencies, where no adequate safeguards for the rights of individuals exist, only on the grounds of substantial public interest and only after additional risk assessment. Special conditions for dissemination can be endorsed.

CODE 4:
Permits dissemination but only within the originating organisation.

CODE 5:
Dissemination can only be made in compliance with the special conditions imposed. These conditions should be detailed. Any further dissemination of the content will only take place when the documented conditions have been met and/or the originating agency has been consulted.

Note
The intelligence is generally evaluated and graded using a single letter and two numbers as in the following example: E,5,1 (untested source, suspected to be false and may be circulated to other law enforcement and prosecuting agencies) the abbreviation EEA means European Economic Area, e.g. part of the European Union.
Appendix 6

The Proposed Public Service Intelligence Process (PSIP)

Introduction

The PSIP process (Figure A5.1) attempts to remove the complexity of the NIM in response to the declared requirements of a significant proportion of research subjects: “we need a simplified version ...” (RS09). It only focuses on four entities: the referral, the Intelligence Unit (IU), the Investigation Manager (IM) and the Investigator. This provides a cycle of activity that requires all referrals to initially go to the IU; thus preserving the integrity of intelligence-led investigation; and organisational probity in accessing personal data. The processes and mechanisms within the IU must conform to the Intelligence Cycle, but will depend upon the resources available and the embedded agency procedures - these are unlikely to be changed because of external ‘intelligence process demands’. However, an essential element, and one that is generally acknowledged, is that IU staff should be properly trained to ensure that they are aware and compliant with the regulatory demands of the criminal justice system (including evidential integrity, RIPA and the DPA); and familiar with the work of the investigator (to ensure that the service and products they provide are ‘fit for purpose’). In addition, each IU complement must include one qualified member of staff capable of undertaking analysis and delivering the products outlined in the Intelligence Cycle, i.e. developing inferences, identifying information gaps and making recommendations relevant to the task. Following information gathering, process and analysis, the intelligence products of the IU (ideally in a referral and intelligence file or docket), are directed to the Investigation Manager (IM). It upon this individual that, on the basis of the intelligence products, the tactical decision making relies and who determines the initial allocation of work; the monitoring and quality supervision; and ultimately the ‘disposal’ e.g. termination of the investigation, administrative sanction, or prosecution. Ideally, the IM should be supported by a representative of the IU, such as an Intelligence Officer or Analyst – this will be unlikely on a daily basis, but may be possible on a monthly cycle. It should be acknowledged that the IU and the IM may be (and generally are) geographically separated unlike the more convenient divisional communities enjoyed by the police.

The IM is required to allocate the referral, ideally selecting an investigator with the appropriate experience, and capacity to undertake the investigation, based upon the accompanying intelligence. Once the referral has been allocated, the investigator can communicate directly with the IU (hence the dotted and arrowed line) requesting intelligence support as the case progresses. With the employment of an appropriate Case Management System, the IM has the facility and opportunity to provide effective monitoring and supervision of the investigation. Should the case develop and it transpire that it is serious, organised, complex, serial or series,
the Investigator can raise a ‘follow up’ referral and forward it to the IU for further development – thus completing the PSIP Investigation Process cycle.

Intelligence-led investigation and decision making through tasking and coordination provides the core doctrine of the NIM. For any revised model to remain compatible with the NIM and support partnership it must acknowledge, and include, a similar tasking process – decision making based upon intelligence products. The NIM tasking and coordination process has been previously described in Chapter 2. Even a cursory review of the NIM literature on the subject should clearly demonstrate that it will appear complex, employing unfamiliar terms and this was revealed during the research, this complexity is not reduced by the ACPO (2005: 74-84) guidance or subsequent advice. The NIM version of tasking and coordination does not fit most public services and the descriptive products tend to confound the managers and investigators – many of the products simply do not exist within many of the public services. The use of terms such as ‘control strategy’, ‘intelligence requirement’ and ‘tactical menu’ are of minimal relevance to public service agencies and it is therefore proposed that the PSIP excludes them. Essentially, the public service require a much simplified and revised version of tasking, catering for their discrete need and this precludes much of what the NIM requirements. I am proposing, in order to support a degree of common parlance and joint working, that agencies should retain the same titles, as described in the NIM guidance, for the two different types of groups necessary for intelligence based decision making. For smaller agencies this requires the maintenance of a sole strategic tasking and coordination group (ST&CG), with a select senior management membership, supported by an analyst and, on the basis of the intelligence products, to deliver the organisational direction regarding intelligence focus and investigation activity to reduce loss through crime. The ST&CG should, usefully, sit twice a year, but the frequency of assembly should be determined by the chair. Critical to the process is that all strategic direction regarding the reduction of loss are clearly communicate in plain language to their Intelligence Unit staff and investigators. To provide three illustrative examples, the DWP ST&CG may direct intelligence and investigative for the first-half of 2012 on fraud relating to ‘Working and Claiming’. The ST&CG for the IPS may direct focus on ‘The Day of the Jackal’ fraud (as in ‘Operation Wisdom’ and the series offences of hi-jacking deceased infant identity); or alternatively the ST&CG for the DSA may direct focus on ‘driving instructor fraud’ (falsifying ADI certification).

In public services each investigation team, would be represented by a tactical tasking and coordination groups (TT&CG). The TT&CG would be chaired by the IM, comprise of selected investigative staff and be supported by an Analyst or Intelligence Officer – this meeting would not be the same as a case conference (reviewing an individual or collection of investigations),
but would endeavour to put any strategic directions into practice; and make resource decisions, and allocations, on the basis of intelligence products to reduce loss. The ideal frequency would be once a fortnight, but this should be determined by the chair and the availability of a suitable IU representative to source and deliver the appropriate intelligence products to support tactical and operational decision making. All public services are hierarchical and the TT&CG meetings provide a mechanism of accountability upon the IM, it also provides an opportunity for that individual’s line managers to, occasionally, attend the TT&CG, review the proceedings; ensure compliance with ST&CG direction and guidance; and to provide support and feedback.

Guidance

This Public Service Intelligence Process (PSIP) guidance is for public services with an investigative capability and is designed to support intelligence-led investigation and facilitate effective joint working, acting as a supplement to the National intelligence Model (NIM) employed by the UK police services. This document can be read in association with the NIM, when specific direction is required regarding specialist activities, e.g. test purchases; ACPO (Centrex and NPIA) and Home Office guidance and best practice is also available from the following publications:

- RIPA; CPIA; PACE; DPA; Criminal Records Bureau (CRB)
- ACPO: Anti-Corruption Advisory Group (Vetting Protocol Of Intelligence Staff)
- ACPO: Codes Of Practice on the Management of Police Information
- ACPO: Code of Practice for Data Protection
- ACPO: Deployment Standards for Technical Support In Tackling Volume Crime
- ACPO: Guidance on the Management of Police Information
- ACPO: Guidance on the National Briefing Model
- ACPO: HMR Memorandum of Understanding Disclosure of Information
- ACPO: Major Incident Room Standardised Administrative Procedures Manual
- ACPO: PNC Compliance Strategy
- ACPO: Practice Advice on Prison Intelligence and Related Matters
- ACPO: Practice Advice on Resources and the People Assets of NIM
- ACPO: Practice Advice on Tasking and Co-Ordination
- ACPO/ACPOS/HMC: Manual of Standards for Accessing Communication Data
- ACPO/Centrex: Guidance on the National Intelligence Model
- ACPO & HMRC: Standards for the Deployment of Undercover Officers
- ACPO & HMRC: Standards for Deployment of Test Purchases and Decoy Officers
- ACPO & HMRC: Standards for Covert Human Intelligence Sources
- ACPO & HMRC: Standards In Covert Investigations; Manual of Surveillance
The Public Service Intelligence Process

A ‘referral’, in terms of the public service investigations, relates to any information relating to a ‘customer’, potential customer or staff member that provides evidence or suspicion of irregularity – this may not result in a criminal investigation as it may be categorised as a system error or loss.

Figure A6.1: The Public Service Intelligence Process

Intelligence-led Investigation

The PSIP will utilise the Intelligence Cycle (see Figure 1.2), ensuring that intelligence-led investigation is employed in all criminal investigations. This will also ensure that there will always be a recorded (collection plan) purpose and auditable trail for data mining; system checks; and intelligence gathering.
The constituents of a collection plan should include:

- Define your objective employing the ‘SMART’ acronym: specific, measurable, achievable, realistic and timed.
- Identify and record key intelligence sources
- Define method and mechanisms of collection, e.g. system checks, PNC, etc.
- Define format of collection, e.g. electronic, case management system, intelligence folio/docket, etc.
- Define contact points, this may include identified individuals as specific points of contact (SPOC) in other organisations and subject to conditions within an agreed Memorandum of Understanding
- Identify and record powers/authority to collect information
- Obtain and record consents/authority where necessary
- Specify deadlines and contact point

**Intelligence sharing**

All external intelligence sharing with, and requests from, other agencies, organisations or the police service, must be dealt with by the Intelligence Unit in accordance with established policy, procedures including any prevailing Memoranda of Understanding / Service Level Agreements – observing agreed authority levels. The 5x5x5 format must be employed (see Appendix 4).

**The ‘asset’ requirements**

The PSIP requires agencies and organisation to have dedicated ‘assets’ to support intelligence-led investigation and to facilitate joint working, these can be described as ‘people’, ‘system’, ‘knowledge’ and ‘source’ assets. These should include:

- trained investigators, intelligence officers and a crime analysts (**people**);
- secure intelligence and data storage (**system**);
- appropriate training, policy and procedure regarding ‘knowing the business’, the law and regulation relating to investigation (**knowledge**); and
- an intelligence unit (**source**).

**The PSIP: Referrals**

A referral will form the foundation of an enquiry and investigation, as such it is a critical feature and must be accorded sensitive handling and subject to close supervision. All referrals, from whatever source, must be directed to the Intelligence Unit. The only alternative will be if the referral is considered to be sensitive or relate to a member of staff or associate, in which case it
will be referred to the Internal Security Unit Manager. All referrals must be recorded on a secure system, reviewed and processed in accordance with established organisational policy and procedure to ensure that consequent action is lawful and that evidential integrity is maintained. Following review and preliminary intelligence gathering, the Intelligence Unit Manager or Referral Manager must decide whether to allocate a referral for operational investigation, together with all intelligence products. Referrals, intelligence searches and analytical products are disclosable for the purpose of the CPIA and must, therefore, be properly recorded, maintained and capable of audit. When referrals are delivered from a confidential source, or are of a sensitive nature, the referral should be graded (using the 5x5x5 system) with an appropriate restrictive handling code.

The PSIP: The Intelligence Unit
The Intelligence Unit must have a dedicated Intelligence Manager or Referral Manager who is responsible for all intelligence collection, collation and evaluation in response to referrals; progressing investigations; and legitimate information requests. The Intelligence Unit must maintain a secure recording system and is responsible for probity with regards to all intelligence issues. The Intelligence Unit must have a trained criminal analyst as a member of its complement who will be tasked by the Intelligence Manager to provide support for senior managers and all investigative staff. Trained Intelligence Officers are responsible for progressing all intelligence gathering, collation and evaluation; preserving evidential integrity; and providing support for analysts and all investigative staff.

The PSIP: The Investigation Manager
The Investigation Unit must have a dedicated Investigation Manager who is responsible for the allocation of all referrals from the Intelligence Unit, and the supervision of all criminal investigations undertaken by operational investigators. Monitoring and supervision must be supported by an established case management system capable of documenting and verifying all investigative activity, providing evidential integrity, and an auditable record of compliance to organisational policy and processes. The Investigation Manager will chair a regular tactical tasking and co-ordination group (TT&CG) meeting to improve resource-based decision making in accordance with direction and guidance from the strategic tasking and co-ordination group and the intelligence (analytical) products, and to monitor and provide direction on ‘live’ cases.

The frequency of TT&CG meeting should be at least once a month and it should be supported by the Intelligence Unit criminal analyst, who will provide a review on the profile and volume of the agency referrals; current trends relating to criminal risk; and a summary of good practice resulting from operational analysis. The Investigation Manager will be responsible for any
decision regarding the termination of an investigation as in ‘no further action’; engagement in joint working; administrative sanction e.g. cancellation or recovery; and the referral to a legal department or seeking police prosecution.

*The PSIP: The Investigator*

Trained operational investigators must be under the direct supervision of an Investigation Manager. On allocation of a referral, they are responsible for expeditiously and lawfully progressing investigations and recording all investigative activity on an established case management system. They must direct all intelligence requests, analytical requirements and ‘information requests’, e.g. from outside agencies, to the Intelligence Manager in accordance with agreed organisational procedures. The investigator must identify and inform the Investigation Manager as soon as it becomes evident that a decision is necessary regarding the consequence of an investigation including: the termination of an investigation e.g. ‘no further action’; engagement in joint working; administrative sanction, e.g. cancellation or recovery; or the referral to a legal department or seeking police prosecution.

*Strategic Tasking & Co-ordinating Group*

There must be at least one strategic tasking and coordination group (ST&CG), chaired by a senior manager and supported by an Intelligence Unit criminal analyst. It is recommended that the group includes at least one Investigation Manager and one Intelligence Manager (these posts can be rotated) to support operational decision making. The purpose of the ST&CG is, on the basis of the intelligence products, to deliver the organisational direction regarding intelligence focus and investigation activity to reduce loss through crime. The ST&CG should, ideally, sit twice a year, but the frequency of assembly should be determined by the chair. Critical to the process is that all strategic direction regarding the reduction of loss are clearly communicated in plain language to the Intelligence Unit staff and Investigators.

*The PSIP: Summary of Process*

The PSIP ensures intelligence-led investigation. Through tasking and co-ordination it provides a transparent and recorded mechanism for strategic considerations of crime and risk reduction to influence and provide direction for all tactical and operational criminal investigative activity. No perceived guidance from, or interpretation of, this model or the National Intelligence Model can override the paramount demand for complete integrity and probity in criminal investigation. Investigation Managers and Intelligence Managers must ensure strict compliance with established guidance, codes of practice; legislative and regulatory requirements relating to investigation and the criminal justice system. The transition of a referral through to an investigation should be regulated by published policy and procedure. Investigative activity and
decision making must properly documented and employ a dedicated and secure recording system, capable of interrogation by authorised staff and audit. The tasking and co-ordination process should be moderated to ensure that investigative staff have the capacity to expedite enquiries, maintaining appropriate ‘duty of care’, with regards to individual rights, and capable of evidencing ‘due diligence’. 
Appendix 7

Recommendations

1. Non-police public services that have ‘adopted’ the NIM should undertake a comprehensive review, including the attitudes and activities of operational staff, to establish their level of conformity with the ‘Guidance’ and minimum standards. *This will inform them as to whether ‘adoption’ of the NIM has genuinely contributed towards standardisation of process and procedure with the police.* Although only a partial solution to the problems associated with ‘data anxieties’, isolationism, diverse objectives and perceived imparity, in the absence of such commonality, productive intelligence sharing and partnership may prove elusive.

2. Having assessed the level of conformity (or compliance) with the NIM ‘Guidance’, establish the actual level of intelligence-led decision making and investigation. *‘Adoption’ of the NIM may not necessarily have resulted in increased efficiency and effectiveness decision making or investigations, but may have improved supplementary issues, e.g. governance in intelligence acquisition, storage and application.*

3. For public services that have not yet ‘adopted’ the NIM, but are considering it - careful deliberation is necessary together with a comprehensive understanding of the requirements for conformity outlined in the ‘Guidance’ and minimum standards. *Non police agencies are not subject to legislative compliance or an inspection regime, providing latitude with regards to ‘asset requirements’ and the recommended processes. However, selective application may frustrate both commonality of investigative practice (with police) and standardisation, potentially frustrating the objective for adoption and not delivering the potential benefits of the model.*

4. Public services intending to adopt the NIM (engage with Recommendation 3 above), should consult and clearly communicate with their investigation staff before adoption; comprehensively establish the necessary ‘investment’ and process ‘requirements’ to achieve the level of conformity with the model that meet the agency objectives; and employ a formulated change plan and qualified change manager for implementation.

5. Consider an alternative intelligence-led investigation process. *The NIM may appear complex to agency staff and the terminology employed may appear partial (to police) and confusing. Conformity to the model requires substantial investment and modification to traditional public service investigation processes. Without proper investment; support and contribution from senior managers; the awareness, understanding and support of investigation and intelligence staff; and embedded intelligence-led processes, the model will not deliver improvement.*
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National intelligence Model: Minimum Standards

The following excerpt is from Appendix 2 of the ‘Guidance on the National Intelligence Model’ (ACPO/Centrex, 2005: 111-159). The ‘Guidance’ is 207 pages in length and provides a summary of the background to the NIM, the ‘Code of Practice’ and the minimum standards. It provides this explanation: NIM consists of eleven individual elements. Each section of this document focuses on a single element of the NIM business process. Each element has a set of minimum standards associated with it, and a checklist of them is provided at the end of each section. Forces must take appropriate action to ensure that they comply with all 135 standards within the time frame given. The minimum standards are discussed in Appendix 2.

Appendix 2

The features that enable the intelligence unit and other staff to operate effectively and to the minimum standard prescribed by ACPO are covered here. Police forces must take appropriate action to ensure that they comply with all 135 standards listed by November 2005. HMIC will inspect the application of NIM in forces against the national minimum standards.

1. CURRENT LEGISLATION AND CASE LAW

A professional Police Service will ensure that its staff remain fully informed of legislation and case law developments, and that they have ready access to up-to-date information sources on a round the clock basis.

Meeting the Criteria

There must be continual access to a knowledge repository (locally, centrally, or electronically) and it must cover all areas of policing activity, for example:

- Crime;
- Traffic;
- Community;
- Special Branch;
- Firearms;
- Domestic violence;
- Child protection;
- Genesis;
- National Centre for Applied Learning Technologies (NCALT);
- Various private legal databases, details of which can be found in Appendix 3 or through the Office of Public Sector Information: http://www.opsi.gov.uk

Global Force access is considered highly beneficial.

2. CODES OF PRACTICE AND SECONDARY LEGISLATION

A code of practice under the Police Act 1996 is a statutory document which provides a high level strategic framework and principles enabling the development of detailed guidance and practice advice. Some codes of practice are in the form of secondary legislation, providing mandatory compliance, e.g. the Police and Criminal Evidence Act 1984 (PACE).

Meeting the Criteria

Ensure access to, and an understanding of, codes of practice relating to:

- NIM;
- RIPA;
- CPIA;
- PACE;
3. MANUALS OF GUIDANCE

Manuals of guidance describe the minimum level of standards and subsequent compliance required by forces or law enforcement agencies in respect of various policing activities, for example the investigation of missing persons or the police use of information. This enables effective deployment within a legal framework, and provides a basis for a national learning requirement.

Meeting the Criteria
Ensure access to, and an understanding of, standards in respect of relevant subjects, for example: NIM, data communications SPOC, dangerous offenders, priority and prolific offenders, prison intelligence, covert operations and the ANPR system.

4. PRACTICE ADVICE

Practice advice documents provide details of good practice, suggest operational methods and structures and provide a further basis for the delivery of training.

Meeting the Criteria
Ensure access to, and an understanding of, practice advice where relevant. For example, practice advice on NIM, murder investigation and anti-corruption. Access can be locally or centrally available, or made available electronically through the use of systems such as the ACPO Intranet or Genesis.

5. FORCE POLICY RELEVANT TO INTELLIGENCE

Individual force policies on intelligence must complement minimum standards and practice advice, while further establishing NIM into everyday policing.

Meeting the Criteria
The following must be in place and adhered to:

- Intelligence strategy;
- CHIS policy;
- Forensic policy;
- T&CG policy.

6. ACCESS TO KNOWLEDGE ASSETS

Providing ready access to knowledge assets is vital to the success and universal understanding of NIM and the intelligence-led policing process.

Meeting the Criteria
Ensure access to NIM guidance and practice advice documents through NCALT, Genesis, force intranet sites and hard copy documents. Ensure access to the periodic *NCPE Covert Intelligence Journal* (see Appendix 6 for contact details) and the Genesis NIM website, both of which provide a forum for frequently asked questions (FAQ) and promote good practice, data sharing protocols, marketing materials and briefing products.
6. FORCE NIM COMMUNICATIONS STRATEGY

The development of a marketing and communications strategy designed to promulgate the benefits of NIM both internally and externally to the Police Service, is fundamental to the successful implementation and further development of NIM.

Meeting the Criteria
There must be a method in place such as Genesis, for communicating a standard message to all staff and partner agencies, including the capture and dissemination of case study examples of local and/or national good practice.

8. FORCE IT STRATEGY (FORCE INFORMATION STRATEGY)

All police forces’ IT strategies must include issues relating to the support and maintenance of intelligence IT structures. This will ensure the continual employment of intelligence-led policing.

Meeting the Criteria
There must be a force IT strategy in place that is consistent with intelligence-led policing. This includes a priority service for the maintenance of technology used by intelligence analysts, and the regular review and upgrading of analytical tools in line with individual force needs. Police forces must ensure the security vetting of a limited number of IT staff, and make certain that those staff have access to secure information for maintenance purposes.

9. IT DISSEMINATION OF FORCE/LOCAL CONTROL STRATEGY AND INTELLIGENCE REQUIREMENTS

In order to maintain the Police Service’s focus of direction, all staff members must be aware of BCU, force and/or national priorities for law enforcement, together with the information required to support those priorities, including the National Policing Plan, Force Policing Plan, Community Safety Strategy and local Best Value Performance Indicators (BVPI).

Meeting the Criteria
A force intranet should be used to communicate force/local priorities and intelligence needs to all staff. This may include IT access to force/local control strategic assessments, although security, i.e., GPMS, must be taken into account. See 2.10 Determine Asset Values for more information on protectively marked material using the GPMS.

10. IT DISSEMINATION OF T&CG ACTIONS

Effective management of the T&CG process includes providing an appropriate means of ensuring tasks are carried out and monitored.

Meeting the Criteria
An IT system should be in place to disseminate force/local strategic and tactical T&CG actions to staff and to confirm that all the necessary actions have been carried out and recorded. Dissemination must take security into account and the content may be reduced, particularly at level 2. Access must be restricted to nominated staff only, and good practice identified.

11. FORCE TRAINING STRATEGY

A project is currently underway designed to identify the National Learning Requirement for the intelligence discipline. Many forces provide specialist intelligence training, for example, in research and development and source handling. Only intelligence manager and analyst training courses are, however, delivered as nationally accredited products. It is, therefore, incumbent on forces to provide a training strategy which ensures that all staff members are fully aware of their roles and responsibilities under NIM, until such time as national training products are fully
developed. For further information see ACPO (forthcoming) Practice Advice on Resources and the People Assets of NIM.

**Meeting the Criteria**
A force training strategy must be in place covering explanations of NIM and the processes involved in gathering and submitting intelligence. It should emphasise the importance of intelligence submissions, and the fact that such submissions are especially important from staff in specialist roles outside of the intelligence function.

**IMPLANTS AND BENEFITS**
The impacts and benefits of meeting all of the minimum standards related to the knowledge assets element of NIM are outlined below.

**Increasing Professional Knowledge and Understanding**
Having readily accessible products that allow staff to increase their professional knowledge and understanding, benefits the individual and the organisation. Central repositories of knowledge reduce the duplication of research to locate good practice and legal advice. This repository should be available to operational officers at all times.

**Effective IT Strategies and Structures to Deliver Corporate Standards**
Providing an effective IT strategy which encompasses the intelligence processes and sets a direction for standard IT systems, will improve accessibility to local force and BCU published priorities. Using a standard format for delivering knowledge assets allows for a corporate localised message, greater sharing of standardised information and a more timely access to information.

**Improved Communications**
A communications strategy aimed at marketing the benefits of NIM, both internally and externally, will promote easier implementation and understanding of NIM and ultimately reduce communication costs.

**Training**
A published NIM and intelligence training strategy ensures that focus is maintained on improving the knowledge and skills profile of staff.

**12. PHYSICAL SECURITY**
Access to and from vulnerable areas must be monitored and controlled, and intelligence material must be managed in a secure manner.

**Meeting the Criteria**
Clear desk policies and secure file storage systems must be in place, located within secure intelligence accommodation. Local police forces must ensure that access policies are in place that enable staff to gain entry to secure environments.

**13. SECURITY POLICIES RE: INTEGRITY, CONFIDENTIALITY AND VETTING STANDARDS WITHIN INTELLIGENCE WORK**
Those individuals working within secure environments must be subject to clearance themselves. The manner in which material is recorded, disseminated and retained must also be the subject of security policy.

**Meeting the Criteria**
The use of the GPMS must be apparent. Documents and products must be appropriately GPMS coded. IT access and access to data must be restricted and auditable. Vetting protocols for intelligence staff must accord with ACPO Anti-Corruption Advisory Group (ACAG) policy.
14. DISCLOSURE

Compliance with the rules relating to disclosure under the CPIA is vital to maintaining the integrity of intelligence-led policing.

Meeting the Criteria

A system must be in place to provide an assessment of intelligence products which enables the release of intelligence material to the disclosure officer.

15. STERILE CORRIDOR

Duty of care and the protection of covert assets are principles that must be adhered to in the targeting of criminals and criminality.

Meeting the Criteria

Police forces must ensure source protection and confidentiality both internally and externally in information sharing and the dissemination of intelligence. A firewall must be installed between the employment of covert resources and all other elements of business outside the authorisation process.

16. REAL-TIME SEARCH CAPABILITY

Being able to make an early risk assessment on the nature of any incident being attended, through the use of sound intelligence, is vital to ensuring effective police response.

Meeting the Criteria

This capability particularly applies to the patrol function. Police forces should consider providing a service for staff attending incidents (usually located within command and control) which enables informed decisions and risk assessments to be made by relaying pertinent intelligence. This service should be located within command and control. Data integrity and quality is essential for it.

17. STANDARD ANALYTICAL TOOLS

Nationally recognised analytical tools are essential to effective analysis.

Meeting the Criteria

Local force standards must be set and implemented. They will include a wide search capability for all intelligence analysts and also the provision of IT and training. For further information contact the National Analyst Working Group (details in Appendix 6) and see ACPO (forthcoming) Practice Advice on Tasking and Co-ordination.

18. EFFECTIVE BRIEFINGS AND DEBRIEFINGS

All staff should be fully briefed and continually informed of all tasking and intelligence requirements. Debriefing is also vitally important in maintaining the cycle of information.

Meeting the Criteria

Intelligence must be fed back to the Intelligence Unit and dedicated briefing facilities, structures and processes must be established in all areas of activity. The patrol function briefing must correlate with the tactical menu and drive tasking. The NBM must also be adhered to. For further information see ACPO (forthcoming) Guidance on the National Briefing Model.

19. INTER-AGENCY INFORMATION SHARING PROTOCOLS

Information management and the provision of protocols, standard operating procedures and MOUs between agencies, are essential to the efficiency of NIM. The ACPO (2005) Code of Practice on the Management of Police Information and ACPO (forthcoming) Guidance on the
Management of Police Information provides information on such protocols at a national and international level.

Meeting the Criteria
Examples of inter-agency information sharing protocols include:

- CDRP;
- Wider crime reduction partnership community protocols at both local (level 1 and 2) and regional (level 2 and 3) levels;
- Section 115 of the CDA, which provides a statutory gateway for information sharing for crime and disorder purposes.

Prison intelligence protocols must be established to enable profiling of dangerous/sex or priority and prolific offender releases.

20. STANDARDISED AND INTEGRATED INTELLIGENCE DATABASE

Integrated information and intelligence systems provide a reliable framework for quality data management and analysis and such systems are the forerunners of a nationally integrated network.

Meeting the Criteria
Forces will have an integrated custody/case/nominal, forensic, crime and incident reporting database in place to aid in the search and retrieval of data to assist analysis. Partner agency information/data will be included in accordance with agreed protocols, thereby assisting local prevention and enforcement planning. Being a member of a data warehousing consortia together with other regional forces enables the search and retrieval of information across organisational boundaries.

21. HIGH-SPEED SEARCH CAPABILITY

Rapid information searching and retrieval is vital.

Meeting the Criteria
There must be direct single key access/input and search capability across integrated databases.

22. AUTHORITIES PROCESSES AND DOCUMENT MANAGEMENT SYSTEMS IN PLACE

Compliance with legislation such as HRA, CPIA and RIPA requires an auditable and secure authority and management system.

Meeting the Criteria
Police forces must have document management and file tracking systems that facilitate the auditing of paper systems and authorities (electronic or paper system to show history of input and access, dates, owners, authority). Police Informant Management Systems (PIMS) is an example of such a system.

23. HUMAN RESOURCES SYSTEM

Personnel management is a key factor in delivering NIM successfully. See standards 41 Minimum Establishment Policy and 42 Succession Planning.

Meeting the Criteria
Police forces must have a human resources system in place to monitor the skills profile and availability of key personnel.
24. SYSTEM DEVELOPMENT

Ensuring the availability of up to date IT solutions and systems development for the purposes of information and intelligence management will provide credible NIM products.

Meeting the Criteria
An Intelligence Steering Group must be established which has responsibility for continual systems development, including IT. This group should identify the requirements and report on or investigate solutions. Connectivity of information systems and analytical tools is a priority to ensure the quality and timeliness of intelligence product delivery.

25. IT CRITICAL INCIDENT RECOVERY PROCEDURES/PROCESS (FORCE DISASTER RECOVERY STRATEGY)

The ability to provide access to, and the use of, information sources must be maintained in the intelligence process.

Meeting the Criteria
Protocols must be established to facilitate priority IT service, maintenance and recovery to allow the continuity of business in the event of a crash to the intelligence function and, in particular, the analytical capability.

26. USE OF PNN2 AND CJX (STANDARD LEVELS OF ACCESS)

National IT standards must be maintained including the security standards essential for the use of the second generation Police National Network (PNN) telecommunications infrastructure, PNN2, which supplies forces with telephony, internet access and secure extranet. The use of the Criminal Justice Extranet (CJX) allows secure information sharing with other agencies connected to the network, including the CPS, CRB and Forensic Science Service.

Meeting the Criteria
Forces must comply with the national standards set by PITO and install inspection measures to confirm adherence to these.

IMPACTS AND BENEFITS
The impacts and benefits of meeting all of the minimum standards related to the system assets element of NIM are outlined below.

Local Force Policy and Procedure for System Assets
The establishment of policies and procedures in line with minimum standards allows police forces to undertake internal checks against agreed national and local standards, and to give better value for money including reducing cost and bureaucracy.

Security and Integrity
Implementing the minimum standards regarding security and integrity will provide improved protection of intelligence assets. Personnel vetting and the establishment of sterile corridors and clear desk policies will embed a ‘need to know’ culture.

Research and Analysis
An efficient and timely research capability giving immediate and direct access to information enables informed operational risk assessments and appropriate action to be taken. It also provides reassurance to front line staff. Improved access to data through the use of standard products for intelligence and analytical functions leads to greater efficiency and effective use of resources.

Information Management
Adherence to both NIM and information management standards (in terms of intelligence databases and authorities processes) creates a more competent platform when accessing and sharing data with partners. This, in turn, improves the flow of information and data sharing. It
also improves cross-border search ability and enables remote access to systems. Compliance with the NBM will assist in providing an efficient, intelligence-led, response service.

**Information Technology Policy**

An information systems strategy to underpin police force and local core business processes is at the heart of NIM. Essential data must be safeguarded. In the event of a system failure, this strategy will clearly demonstrate the measures to be taken to ensure the continuity of information management during any recovery period.

**27. VICTIMS AND WITNESSES**

Victims of crime and witnesses to crime are vital sources of intelligence. The ability to identify repeat victims; vulnerable persons, areas of criminal activity and categories of crime provide important sources of information for the NIM process.

**Meeting the Criteria**

Intelligence should be secured from victims/witnesses who have been the subject of offences that fall within the control strategy or who have witnessed such offences. The details obtained from them must be reported to the intelligence function. This will include data input into the SCAS from such sources. For further information see *Home Office (forthcoming) Codes of Practice for the Use of the Serious Crime Analysis Section.* A force policy must be implemented locally to engage in intelligence interviews with repeat victims. These interviews must be subject to risk assessment and conducted with the knowledge and sanction of the senior investigator.

**28. REPEAT VICTIMS**

*See standard 27 Victims and Witnesses*

**29. PRIORITY AND PROLIFIC OFFENDERS**

Collecting as much information as possible about the activities of priority and prolific offenders enables offender profiling, improves tasking and enhances the effectiveness of analytical products.

**Meeting the Criteria**

A force policy must be in place, and implemented locally to engage in intelligence interviews with priority and prolific offenders. These interviews will be subject to risk assessment and conducted with the knowledge and sanction of the senior investigator.

**30. ACCESS TO COMMUNITY INTELLIGENCE**

Access to community intelligence is an important aspect of integrating NIM with neighbourhood policing. Information gained from local communities should be used to inform the strategic and tactical assessments at level 1 and 2 which will assist in the deployment of resources in response to problems of crime and disorder. See *ACPO (2005) Practice Advice on Professionalising the Business of Neighbourhood Policing (Draft).*

**Meeting the Criteria**

There must be force/local management of knowledge around community information such as local demographic profiles, community contacts and resources, community profiles and multiagency information.

**31. CRIMESTOPPERS**

The Crimestoppers process provides vital sources of information which, in response, require research, analysis and appropriate action.
Meeting the Criteria
There must be access to corroborative evidence or the capability to receive, evaluate and seek corroboration, to enable assessment and tactical resolution to be conducted where appropriate.

32. PRISONERS/PRISON VISITS

Intelligence approaches to persons in police custody, conducted within guidelines, and early visits to convicted prisoners have been shown to provide high quality information and intelligence which can be used effectively in the NIM processes. See ACPO and HMCE (2004) Manual of Standards for Covert Human Intelligence Sources and ACPO (forthcoming) Practice Advice on Prison Intelligence and Related Matters.

Meeting the Criteria
An intelligence approach policy must be established in accordance with identified priorities. Active use should be made of prison visits to assist the capture of intelligence. Risk assessments must be carried out.

33. PRISON INTELLIGENCE

Intelligence approaches to persons detained in police custody, conducted within guidelines, and early visits to convicted prisoners can provide high quality information and intelligence which can be highly beneficial in the NIM processes. See ACPO (forthcoming) Practice Advice on Prison Intelligence and Related Matters.

Meeting the Criteria
At a force level, there must be the capability to develop meaningful profiles of criminals who are to be released from Her Majesty’s Prison (HMP) or future equivalent or a National Offender Management process. This is likely to include certain recidivists and defined priority and prolific offenders who fall within control strategy priorities, together with dangerous offenders and sex offenders that pose a high risk. Target profiles should be developed to national standards using police, probation and prison intelligence to enable a threat assessment to be conducted and tactical plans to be developed, thereby reducing risk to the public. Protocols and authority levels for data exchange must also be in place (see 2 System Assets).

34. COVERT HUMAN INTELLIGENCE SOURCES (CHIS)

The lawful, ethical and efficient use, conduct and tasking of CHIS in accordance with identified priorities, is seen as one of the most powerful and cost effective intelligence tools available to law enforcement.

Meeting the Criteria
There should be active use of CHIS in line with legislation, ACPO minimum standards and control strategy priorities.

35. USE OF ENHANCED CHIS PROFILING

The use of enhanced CHIS profiling can be particularly beneficial when used as part of an intelligence collection plan on an organised criminal group or a location difficult to infiltrate.

Meeting the Criteria
Police force and/or local enhanced profiling of all CHIS assets and searches of the National Source Database (at NCIS) should be considered, where necessary, in order to optimise intelligence opportunities.
36. UNDERCOVER/TEST PURCHASE OPERATIVES


37. ACCESS TO INTERCEPTION PRODUCT


38. SURVEILLANCE PRODUCT

Covert deployments, while often evidential in nature, provide a large volume of intelligence concerning the subject of an operation as well as their associates and other related issues. Further information can be found in ACPO and HMCE (2004) National Standards in Covert Investigations Manual of Standards for Surveillance.

Meeting the Criteria
Information or intelligence obtained from covert deployments (identified in 3 Source Assets) should be recorded onto the intelligence function and organisational memory. Sterile corridor processes should be considered at the time of the exchange of material between covert units and the intelligence function, including the sanitisation of information reports. Access to covert units will be through defined gateways. Covert deployments will be in line with control strategy priorities, but may also be used on other high profile crime issues. Policy logs must be maintained and full risk assessments evident for all stages of the information exchange. Policies must be in place to allow direct submission of intelligence to operational command where immediate personal and/or operational risk is identified.

39. FORENSIC DATA AND FORENSIC INTELLIGENCE POLICY

The incorporation of forensic sources of information or intelligence enhances the NIM processes by giving a fuller picture of criminal behaviour and patterns.

Meeting the Criteria
Forensic data, in particular from linked crime scenes, should be used as source material and introduced into the intelligence function in line with control strategy objectives. Force level management of forensic hits will be in place to ensure inclusion within the T&CG process and ensure that information is acted on in a timely fashion. Forensic intelligence and data should be included in the crime series and target management forums along with access to SCAS data. Forensic and intelligence strategies and policies will enforce these standards.

40. OTHER SERVICE/AGENCY TASKING

Sources of information are available from a wide variety of other agencies and law enforcement bodies and must be used where appropriate.

Meeting the Criteria
Measures must be in place to identify and use external source opportunities to enable tasking and access to products through agreed gateways. Tasking another law enforcement agency’s CHIS via the National Source Management Unit at NCIS, which is in line with control strategy priorities or an approved major enquiry, will be subject to an auditable and justifiable request and authority process.

IMPACTS AND BENEFITS

The impacts and benefits of meeting all of the minimum standards related to the source assets element of NIM are outlined below.
Multiple Sources of Information
Adopting the stated minimum standards will ensure that information is obtained from multiple sources. Engagement with partner agencies can provide a vast source of information and data relating to community issues which have previously been under-used. Assets outside the scope of the Police Service can be realised and used to assist both force and local objectives. This will lead to an improved information base with regard to community priorities including crime and disorder issues.

Ownership of Intelligence
The minimum standards will create a culture of understanding that intelligence is everywhere and it is every police person’s job to find it and report it. Creating a minimum standard for gathering intelligence from other internal sources (for example, crime records, child protection records and incident records), and issues such as a focused CHIS strategy communicated to all police staff, will encourage the flow of information and assist the efficiency of the NIM processes.

Profiling
An increased access to victims, witnesses and prisoners for the purpose of intelligence interviewing will lead to enhanced profiling and the development of a victimology. This will provide opportunities to realise the causes of crime and who might have committed them. Community sourced information will assist in the ability to identify local tension hot spots and disorder and behaviour effecting the quality of life in a community.

Targeting and Tasking
These standards will also lead to visible targeting of particularly disruptive elements in a community. Where the standards reflecting source assets are focused on control strategy priorities and intelligence requirements, a more structured and consistent intelligence-led approach at BCU (level 1) and service level (level 2) can be achieved. This will lead to precision tactical deployments, a more cost effective use of resources and better informed decision making – from constable to chief officer.

41. MINIMUM ESTABLISHMENT POLICY
The successful implementation of NIM and its subsequent operation as a model is dependent on ensuring that minimum levels of resources are in place in key roles.

Meeting the Criteria
A local force policy relating to intelligence functions must be in place and adopted at all levels. Key roles and the number of staff required to meet the expectation of a T&CG must be outlined, in accordance with the minimum standards established for those roles. This includes:

- Analysts;
- Data input;
- Evaluation and management;
- Research and development;
- Briefing and source management.

Skills for Justice competency levels must also be met.

42. SUCCESSION PLANNING
The success of an intelligence structure is reliant on building a professional body of knowledge. Succession planning for the key roles identified in NIM is vital.

Meeting the Criteria
A succession planning policy must be in place and adhered to. It is likely to include initiatives such as job share and buddy systems for specific critical roles within the specialist intelligence function.
43. ACPO LEAD FOR NIM IMPLEMENTATION AND DEVELOPMENT

The appointment of an ACPO lead to ensure that respective forces remain focused on their requirements to meet the national minimum standards is an important factor in determining force performance.

**Meeting the Criteria**

An officer of ACPO rank must be appointed as a lead in each police force to ensure the implementation and development of NIM and the maintenance of minimum standards.

44. T&CG CHAIRS

The minimum standards allow local determination of the chairing of local force T&CG meetings. Significant benefits can be obtained from the chief officer chairing the force strategic T&CG. The roles are:

- ACPO Chair of force strategic T&CG;
- ACPO/Designated Deputy Chair of force tactical T&CG;
- ACPO Chair of regional strategic and tactical T&CG;
- BCU Commander Chair of BCU strategic T&CG;
- BCU Commander/Designated Deputy Chair of BCU tactical T&CG.

**Meeting the Criteria**

All police forces must ensure that the relevant T&CG chairs are appointed and have executive authority empowering them to make resource decisions. T&CG chairs should develop the necessary skills and knowledge of their role in line with *ACPO (forthcoming) Practice Advice on Tasking and Co-ordination*.

45. DIRECTOR OF INTELLIGENCE/HEAD OF PROFESSION (INTELLIGENCE)

A senior member of the force with appropriate experience in the field of intelligence and/or proactive investigation can provide a focus for the efficient management of the intelligence process.

**Meeting the Criteria**

The staff member in the role must have ownership of the intelligence function, its development and strategic direction. The head of profession also has responsibility for the production and submission of the four intelligence products, the force control strategy and the intelligence requirement to the force T&CG.

46. AUTHORITIES MANAGEMENT

The establishment of a centrally located police authority’s bureau enables forces to manage the processes and administration concerned with covert operations and CHIS competently. Dedicated police staff can build a body of knowledge relating to NIM and intelligence processes through this.

**Meeting the Criteria**

Police forces must have all of the following in place:

- RIPA authorising officer(s) in compliance with the Act, i.e., an ACPO and Detective Superintendent at force level and a BCU commander locally;
  - Infrastructure and systems to ensure appropriate tasking of CHIS, surveillance, undercover and intrusion;
- Records management for compliance with relevant legislation, manuals of standards and codes of practice;
- Evidence of security and sterile corridors.
47. TELECOMMUNICATIONS SINGLE POINT OF CONTACT (SPOC)

The code of practice and manual of standards for accessing communications data dictates that each force will have a SPOC department to manage all authorities and issues around accessing evidence or intelligence through defined communication systems. Accredited, highly trained personnel provide a point of contact for all police staff and other external agencies.

Meeting the Criteria
A telecommunications SPOC must be in place. SPOC departments are usually located centrally as a resource to individual forces through agreed gateways. All staff operating in a telecommunications SPOC department must have completed the required accredited course. Post-holders must operate according to force policy (see ACPO/ACPOS/HMCE (2003) Manual of Standards for Accessing Communications Data) with regard to accepting requests and disseminating intelligence.

48. INTELLIGENCE MANAGER

An intelligence manager must be of appropriate status to be appointed. This is to ensure that experience is added to the analytical techniques and products before they are presented to the T&CG.

Meeting the Criteria
Intelligence managers are usually of inspector rank at the BCU level of operation. They must have successfully attended an intelligence management training course. As with the role of director of intelligence as described above, an intelligence manager is responsible for the intelligence function and intelligence product delivery locally.

49. CHIS CONTROLLER AND DESIGNATED DEPUTY CHIS CONTROLLER

These roles maintain the integrity of systems and processes and manage the risk involved in the day-to-day engagement with members of the criminal fraternity. These roles are mandated by the ACPO and HMCE (2004) Manual of Standards for Covert Human Intelligence Sources, Part 3 – Roles and Responsibilities.

Meeting the Criteria
The CHIS controller and designated deputy CHIS controller must have successfully completed suitable, accredited, CHIS training. They are responsible for:

- Team supervision of field capability;
- Supervising meetings with sources;
- Ensuring day-to-day alignment with the T&CG control strategy and tactical priorities.

They must also ensure staff compliance with:

- RIPA;
- Dissemination of intelligence policy;
- DPA;
- Internal auditing.

The CHIS controller should be of inspector rank. For further information see ACPO and HMCE (2004) Manual of Standards for Covert Human Intelligence Sources.

50. SOURCE HANDLER

Forces must establish DSUs staffed by highly trained and accredited source handlers. For further information see the ACPO and HMCE (2004) Manual of Standards for Covert Human
Intelligence Sources. NIM supports this principle and recognises source handling as a core function in intelligence-led policing.

Meeting the Criteria
Source handlers must be a dedicated resource and appropriately trained to a minimum of Training Level 2 on a nationally accredited course. They are responsible for the effective, ethical and lawful recruitment, handling and co-handling of covert human intelligence sources in accordance with the requirements of the T&CG.

51. ANALYTICAL CAPABILITY

NIM analyses information and data from numerous sources, thereby providing an intelligent picture of policing issues. The delivery of proven analytical products and key assessments is fundamental to the success of this model. For further information contact the National Analyst Working Group (details in Appendix 6) and see ACPO (forthcoming) Practice Advice on Tasking and Co-ordination.

Meeting the Criteria
Sufficient accredited intelligence analysts must be in place to support tasking processes at both strategic and tactical levels, and in order to support the investigation of major crime. In addition to local analysts, it is highly beneficial to have centrally based analysts so that they can profile force control strategy priorities. There must also be an analytical capability to identify series offences both locally and centrally. A process of series identification should be established to enable reporting to the TT&CG and to aid crime series forums. Minimum staff numbers should take into account force crime/incident profiles and not be prescribed.

52. HEAD OF PROFESSION – INTELLIGENCE ANALYSIS

This position is usually filled by a principal analyst with the post-holder being head of profession for all the intelligence analysts. This role carries responsibility for the strategic development and quality assurance of intelligence products, technical skill levels and training the workforce and will include joint training with partner agencies.

Meeting the Criteria
Police forces must ensure that a fully qualified and trained force principal analyst is appointed and authorised to provide a professional management focus for the analytical discipline.

53. ANALYSTS ACCREDITATION

The deployment of analysts across all levels of policing is a vital component of NIM. Resource strategies for analysts should be linked to the national training strategy for the discipline. Analysts must gain accreditation through training and workplace assessment in order to support prosecutions on the basis of standardised, high quality, intelligence products.

Meeting the Criteria
Police forces must ensure that they appoint sufficient analysts who are trained to appropriate national standards, to meet the needs of the entire scope of policing from the community and partnership level to serious and organised crime, working at all three levels of law enforcement.

54. FIELD AND RESEARCH CAPABILITY

Field and/or research intelligence officers (see 7 Research, Development and Analysis) are responsible for the provision of field and research support in accordance with the intelligence collection strategy. They provide the vital link between covert intelligence collection and analysis, and appointed investigators.
Meeting the Criteria
The deployment of field and/or research officers is aligned to control strategy priorities, unless otherwise sanctioned. Their role consists of the research and development of packages for action (usually to assist the investigative process), a sterile access to source handlers and proactive intelligence collection. They must successfully complete accredited Research and Development training at the earliest opportunity and prior to appointment to level 2/3 resources. A specialist intelligence research capability should be provided where necessary. Such resources are usually based centrally and may consist of:

- Prison liaison;
- Sex offender and dangerous offender resources;
- Financial investigators;
- Crimestopper capability.

All of these resources should be available to police forces through agreed gateways.

55. TECHNICAL SUPPORT UNIT CAPABILITY
Intelligence units will usually have their own technical field capability which will be able to deploy technical equipment against level 1 criminality, based on criteria set by the T&CG and in line with the area control strategy. Although line-managed at BCU level, professional development and procurement of technical equipment should be governed by the head of police force dedicated TSUs. For further information see 4 People Assets and also ACPO (forthcoming) Practice Advice on Resources and the People Assets of NIM.

Meeting the Criteria
There must be access to the TSU, which is usually located centrally. In smaller forces there must be access to a regional unit. TSU officers must be trained to relevant technical standards. See ACPO (2004) Deployment Standards for Technical Support in Tackling Volume Crime and CD published by the former PSDB known as The Yellow Book.

56. INFORMATION AND INTELLIGENCE MANAGEMENT
The timely recording, dissemination and subsequent management of information and data sources are crucial to the provision of a competent intelligence structure.

Meeting the Criteria
There must be sufficient capability to evaluate, input and manage information from a wide range of sources. Data quality, consistency, timeliness of input and compliance with relevant legislation and inputting standards must be ensured. The ACPO (2005) Code of Practice on the Management of Police Information and ACPO (forthcoming) Guidance on the Management of Police Information must be adhered to.

57. DATA PROTECTION
Compliance with legal provisions such as the DPA, PNC Codes and the ACPO (2005) Code of Practice on the Management of Police Information must be stringently adhered to in order to maintain the integrity and security of the intelligence process. This must not, however, prevent the exchange of information with partners in support of policing purposes.

Meeting the Criteria
Intrusive inspections must take place to ensure compliance. This must include the security of IT and information and intelligence assets. Data protection must be seen as part of the process of information management, rather than as a separate process to NIM.
58. DEDICATED IT SUPPORT

In the continually changing world of information technology, intelligence IT systems must be sufficiently robust, efficient and subject to future proofing to ensure that the necessary capacity and quality of product is achieved.

Meeting the Criteria
A post holder must be in place centrally and accessible locally, in order to meet the critical incident recovery policy and to develop IT in accordance with needs. They must also ensure linkage between local systems and national information systems developments, for example, Impact. Service level agreements (SLA) are signed off by the intelligence director and the head of IT.

59. BRIEFING CAPABILITY

See ACPO (forthcoming) Guidance on the National Briefing Model.

Meeting the Criteria
A briefing capability is the responsibility of the intelligence unit. This can be a dedicated role although it does not have to be. Briefing packages, particularly for the patrol function, must be prepared in accordance with T&CG tactical menu actions. The results emanating from briefings must be fed back into the organisational memory.

60. TT&CG ACTIONS MANAGER

This standard should be read in conjunction with ACPO (forthcoming) Guidance on the National Briefing Model and ACPO (forthcoming) Practice Advice on Tasking and Co-ordination. The TT&CG actions manager role is that of an enforcer. It carries responsibility for arranging the execution of TT&CG actions, including follow-up actions allocated to other managers. It may also include responsibility for managing the briefing process. This role may be found on BCU and centrally at level 2.

Meeting the Criteria
Police forces must ensure that there is a capability responsible for co-ordinating actions emanating from the T&CG meetings, enforcing the delivery of those actions, monitoring progress and feeding back results to the T&CG and organisational memory.

61. HIGH VISIBILITY/STRIKE TEAMS

This standard should be read in conjunction with ACPO (forthcoming) Practice Advice on Tasking and Co-ordination.

Meeting the Criteria
Resources must be available for tactical T&CG tasking. The numbers are not prescribed, but may include:

- Dogs;
- Public order units;
- Tactical Support Groups;
- The patrol function;
- Cycle patrol;
- Traffic, air and river support.

If no dedicated capability is in place, a logistics capability to use neighbouring BCU or police force resources, necessary to meet T&CG requirements, should be evident.
62. JOINT AGENCY AND SPECIALIST OPERATIONS INTELLIGENCE CELLS

The formation of joint agency intelligence cells or cells set up specifically for major operations requires careful management and adherence to strict protocols. The following are common examples of joint agency and specialist intelligence cells:

- CDRP;
- Prisons, through adequate investment in prison intelligence officers;
- Immigration investigations;
- Serious crime investigations;
- National security investigations and operations.

Meeting the Criteria

A policy must be in place in police forces to enable the use of multi-agency staff in a joint intelligence cell and should include agreed data sharing protocols, governance issues and security policies. Joint agency intelligence cells usually operate from a single site, with one common purpose dictated by a control strategy.

IMPACTS AND BENEFITS

The impacts and benefits of meeting all of the minimum standards related to NIM people assets are outlined below.

Professionalising the Workforce

Compliance with the minimum standards in respect of establishment policy and succession planning will create resilience within intelligence structures and enable business continuity. In addition, a standardisation of roles throughout the service will promote and enable cross-border cooperation and rationalisation of investigative activities. The minimum standards give rise to a focused training strategy by training personnel to specific skill requirements. Training costs will be reduced through training key staff on the basis of need, while specialising has the effect of increasing professionalism in a particular area and thereby reducing personal and organisational risk.

Corporate Standards and Ownership

The appointment of an ACPO lead will ensure that NIM implementation and the development of NIM as a business model remains at the centre of the strategic processes of each police force. ACPO driving forward implementation provides a level of responsibility commensurate with the mandatory requirement to firmly establish NIM in day-to-day policing concepts. Appointing a head of profession (director of intelligence) along with maintaining the continual professional development of intelligence roles defined in NIM, and ensure maintenance of standards. The appointment of T&CG chairs (with the appropriate level of responsibility and authority) will provide sustainable resource and deployment decisions and specific ownership of each level of the T&CG process.

Legislative Compliance

The provision of specialist SPOC advice and authority units is necessary in ensuring common standards of compliance with legislation and the police authorities processes applicable to NIM and associated policing disciplines. Central Authorities Bureaux and communications SPOC offices provide a protected knowledge base and streamlined compliance capability, which enables the intelligence and covert business community to more readily use and obtain intelligence from specialist sources such as covert surveillance and interception of communications.

Management Specialists

Senior management specialists (with an in-depth understanding of the management of intelligence operations, NIM and related issues such as covert policing tactics) are essential to a professional intelligence structure and the development of NIM. Compliance with the minimum
standards in respect of directors of intelligence, intelligence managers, CHIS controllers and heads of analysis will give forces a strong leadership focus in respect of NIM.

**Analysis**
A highly trained analytical capability with career structures, appropriate grading and professional accreditation, is a core element in the implementation and continual development of NIM. Implementation of the standards relating to analysis will result in the acquisition of a corporate analysis knowledge base, and improve the assessment of policing activity, thereby allowing informed decision making and promoting better quality data for higher quality intelligence products.

**Field and Research Capability**
An ability to build efficient intelligence packages on a foundation of comprehensive research and field operations will lead to improved investigations into targets, crime problems and identified hot spots. Professionally managed and trained technical human resources will provide a tactical capability necessary for the development of intelligence tasking and tactical resolutions. Specialist resources can be more effectively deployed through improved target file development.

**Information Management**
The importance and value of providing an efficient information and data management resource with systems maintained by dedicated IT support cannot be overemphasised. Implementation of standards in respect of information management resources will reduce the risk of compromised sources, data and information. It also has the effect of increasing information flows. High quality information management leads to improved intelligence communication and creates an audit trail to indicate why (justification) issues were, or were not, acted on. It also enables police forces to maintain a consistent flow of information and ensures that police staff have an up-to-date knowledge and understanding of business problems.

**Effective Briefing and Debriefing**
Ensuring that the minimum standards are met will result in improved tasking and direction of patrol officers and that intelligence collection opportunities are optimised. T&CG action managers driving forward the BCU or force business will ensure that the necessary resources are available and actions and tasks are acted on and completed.

**Tactical Response**
Implementation of this standard will deliver an increased focus on proactive policing in accordance with control strategy priorities and enable evaluated information to be quickly acted on, thereby encouraging police staff to support NIM. It will also promote public reassurance, help to resolve problems and disrupt targets, resulting in reduced crime.

### 63. OPEN AND CLOSED SOURCE DATA
Staff should be sufficiently trained and IT must be in place to fully exploit all available sources of data.

**Meeting the Criteria**
Both training and IT should be available to enable local or central access to open/closed source data such as:

- **Forensic information**
  - Shoe Mark Index;
  - Forensic medical training;
  - DNA database;
  - Weapons and injuries database;
Behavioural/offender profiling information
- Catchem;
- Murder Method Index;
- Badman;
- Fire investigation unit;
- Rape and sexual offences;
- V1 Class (behavioural CPA);

Crime/offender profiling
- PNC/VODS;
- Quest;
- Nimrod;
- National prisoner tracing;

Public access and consumer credit agencies
- Internet;
- Media;
- Lexis-Nexis;
- Equifax;
- Experian;
- National Voters;
- CDA.

For more information on these sources and others available to the Police Service, see the Directory of Information Sources in Appendix 3 of this guidance.

64. INTELLIGENCE, CRIME, CUSTODY AND COMMAND AND CONTROL RECORDS AVAILABLE IN SEARCHABLE FORM

All internal data sources must be developed to allow ready access, ease of search and analysis.

Meeting the Criteria
The intelligence function should have IT access to data in a form that is capable of search and analysis through data IT applications.

65. ACCESS TO HOLMES2/SCAS/NCF PROFILING DATA

All major crime enquiries require the ability to interrogate national profiling data.

Meeting the Criteria
Following a risk assessment, there must be a capability for authorised access to national profiling intelligence databases through agreed policy gateways. A policy log should be in place of decisions made. This type of access usually assists a major enquiry SIO. See ACPO (2000) MIRSAP Major Incident Room Standardised Administrative Procedures Manual (forthcoming November 2005).

66. ACCESS TO LIVE DATA EXCHANGE

The ability to research and exchange information on national intelligence data enhances intelligence collection.

Meeting the Criteria
Links must be in place to enable access to national intelligence assets, i.e., ANPR, Livescan, Alert database, Antiques database, NCIS Desks and DNA, MOU, data sharing protocols and nominated staff to aid collection are highly recommended at both force and local levels in accordance with force data protection policies.
67. FULL DATA INTEGRATION MODEL

The compilation of efficient strategic assessments requires access to, and research of, many diverse sources of data in order to form a comprehensive picture of issues affecting policing.

Meeting the Criteria
IT access to the following types of data, possibly achieved through central data warehousing with local links to BCUs must be in place:

- Stop and search;
- Forensic data;
- Human resources (HR) data;
- Crime statistics;
- Custody;
- Domestic violence;
- Firearms;
- Budget and finance;
- Business information;
- Public/victim survey data.

See also 2 System Assets.

68. ACCESS TO HUMAN RESOURCES DATA

While access to human resources data will inform strategic assessments, it is also necessary for day-to-day decision making.

Meeting the Criteria
Police forces must ensure that human resources data provides skills profiles, staffing levels and abstraction and sickness levels to assist operational decision making. Human resources data must enable fast time deployment in accordance with assessed risk and enhanced command/control. See also 2 System Assets.

69. ACCESS TO EXTERNAL INFORMATION SOURCES

The many sources of data now available through partnership approaches to policing provide sources of information that have previously remained unused. Intelligence requirements should be set to examine external information sources.

Meeting the Criteria
Local forces and BCUs must ensure access to other law enforcement agencies, government regulated organisations, business and company data. This should be achieved centrally through agreed gateways and authority protocols. Locally, access to external data can be achieved through CDRP agreements, particularly in planning preventative measures.

Examples of external information sources include:

- Public safety/road safety data – local authority;
- Community intelligence – police/CDRP;
- Quality of life data – census/survey;
- Taxi/hackney carriage data – licensing departments;
- Health and education data – local relevant authorities;
- Local authority housing data.

70. CROSS-BORDER INFORMATION SHARING

Sharing information between neighbouring police forces and within police regions will enable a fuller picture of strategic policing issues to be developed. Similar structures at BCU level will give clearer insight into local issues.
Meeting the Criteria
There must be access to neighbouring force and BCU strategic and tactical assessments to provide a comprehensive picture of strategic and local policing issues.

IMPACTS AND BENEFITS
The impacts and benefits of meeting all of the minimum standards related to the information sources element of NIM are outlined below.

Improved Access to Information
Establishing protocols which ensure access to all available information sources will enable greater research capability for analysts and others to enhance decision-making and justification processes. This will improve knowledge and awareness of external factors effecting policy and lead to high quality strategic assessments and well qualified intelligence products.

Integrated IT Processes
Application of the stated standards will lead to more robust and applicable IT policies with better security in place. IT functions will develop in line with need and this will assist in creating a national integration of force intelligence systems. Improved connectivity of data across all systems will provide more accurate, timely and efficient research and use of data.

Improved Operational Effectiveness
The establishment of minimum standards with respect to information sources will increase staff knowledge of the intelligence and investigative tools available for qualitative research. There will be better informed command and control of operational matters with officer profiling to specific requirement and an improved intelligence assessment. This will also enable more effective management, risk assessments and improved officer safety. Intelligence products enhanced by a wider access to information sources and national intelligence databases will greatly improve local, force, regional and national intelligence-led processes.

71. SANITISATION AND RISK ASSESSMENT PROTOCOLS IN PLACE
The integrity of any intelligence system relies on ethical processes and legislative compliance.

Meeting the Criteria
There must be a policy and resources in place to enable hot intelligence assessments, human rights compliance, officer safety and duty of care considerations.

72. COMPLIANCE WITH DATA PROTECTION ACT

Meeting the Criteria
There must be an information access, retention, review and security policy in place. Data Protection Officers will proactively and intrusively supervise compliance through thematic testing.

73. AGREED DISSEMINATION POLICY
In addition to data access agreements covered in Element 5 – Information Sources, protocols between law enforcement agencies and partners must be established with respect to the dissemination of information and intelligence material.
Meeting the Criteria
Police forces should ensure that protocols are in place, both at a force and local level, governing the transfer of information and its subsequent dissemination. Agreements with CDRP and Criminal Justice Boards are examples of this process.

74. PRIORITISATION OF DATA INPUT AND RESEARCH

Published control strategies (see 9 Tasking and Co-ordination) should be used as a basis for prioritising data input and research. Other issues may take precedence, providing their tasking is subject to control mechanisms.

Meeting the Criteria
BCU and force publication of control strategies should be evident and be seen to drive prioritised input and research.

75. USE OF 5X5X5 AS STANDARD EVALUATION

The National Information/Intelligence Report Form 5x5x5 is the only system recognised nationwide for the recording, evaluation and dissemination of information into the intelligence system.

The ability of staff to have ready access to data input systems, in order to record information, will enhance intelligence collection. The Impact Programme proposes the design of a national data warehouse system allowing all forces to exchange information and intelligence. This system is reliant on forces having common processes for information data inputting and 5x5x5 information/intelligence reports.

Meeting the Criteria
All forces must show evidence of the 5x5x5 system being used in line with the ACPO (forthcoming) Guidance on the Management of Police Information. There must also be evidence of staff training in respect of the 5x5x5 process, including evaluation and risk assessment (by the intelligence function) of submitted information. All forces must be compliant with the guidance mentioned above in respect of the data input of 5x5x5 information/intelligence reports. Direct input of information on to the intelligence process by electronic means must be available to staff.

76. ELECTRONIC INPUT OF INFORMATION/INTELLIGENCE REPORTS (5X5X5)

See standard 75 Use of 5x5x5 as Standard Evaluation.

Meeting the Criteria
See standard 75 Use of 5x5x5 as Standard Evaluation.

77. COMMON STANDARDS FOR DATA INPUT ON TO FORCE IT SYSTEMS

See standard 75 Use of 5x5x5 as Standard Evaluation.

Meeting the Criteria
See standard 75 Use of 5x5x5 as Standard Evaluation.

78. STANDARDISED SYSTEMS FOR AUTHORISING TARGET SELECTION

Standard systems for target selection, managed through the relevant intelligence manager, provide auditable processes which allow decisions to be recorded in compliance with the principles of proportionality, justification and risk assessment. These processes are particularly important when target research and target profiles are authorised prior to T&CG sanction.

Meeting the Criteria
Police forces and BCUs must implement standard target selection systems. Processes are authorised by intelligence managers and will evidence due account of such issues as community impact assessments and human rights principles.
79. PROTOCOLS CONCERNING THE USE OF INTELLIGENCE CODES/FLAGS TO SPEED COLLATION AND RETRIEVAL

The ACPO (forthcoming) Guidance on the Management of Police Information and NCIS policy govern the use of codes and target flagging.

Meeting the Criteria
Police forces must demonstrate compliance with the relevant guidance and policy and have internal standard operating procedures in place. Practical application of such protocols must be evident.

80. DATA MANAGEMENT AND SUPERVISION PROTOCOLS

All data systems should be subject to intrusive and proactive management supervision and quality assurance protocols.

Meeting the Criteria
Police forces should have data quality assurance protocols in place to ensure high data standards. These protocols should include defined review processes with respect to the maintenance of up-to-date intelligence records, file tracking and audit trails. Due consideration must be given to other related NIM standards and practice advice, for example, Data Protection Officers (see 4 People Assets) and OPSY (see 2 System Assets).

81. PERFORMANCE MEASUREMENT

Setting performance targets against specified control strategies and intelligence collection requirements will assist in maintaining the business focus of a force or BCU and encourage the need for good quality intelligence recording.

Meeting the Criteria
There must be evidence of the development of performance measures around the collection of actionable intelligence. This should be in accordance with force and/or local priorities as set in the control strategy and intelligence requirement and sanctioned by the T&CG process. CHIS recruitment in hard to reach groups/locations is an example for DSU staff.

IMPACTS AND BENEFITS
The impacts and benefits of meeting all of the minimum standards related to the information and intelligence recording element of NIM are outlined below.

Recording, Dissemination and Retention Standards
Compliance with the stated standards will provide consistent and timely inputting of information. Consistency of data standards brings effective communication, increases professionalism and reduces the likelihood of misunderstanding. This, in turn, will lead to increased confidence in the quality of intelligence.

Accessible IT Systems
Provision of intelligence forms (5x5x5) in electronic format enables easier access to information sources. Users of intelligence databases will also have faster access to information. Intelligence managers, operational heads and T&CG chairs will be given the ability to assess risks and threats more accurately. IT data standards through reduced bureaucracy will result in time and cost savings and create an increased security of information and intelligence.

Performance Measures
Establishing a performance regime synchronised with identified priorities will drive the corporate alignment of NIM across forces and BCU. Performance measures can be tailored to fit with priorities when proactive resources are deployed. Data quality assurance will help to remove the possibility of substandard intelligence products being developed on the basis of poor information collection and recording.
82. ACCESS TO TECHNICAL SUPPORT/SURVEILLANCE EQUIPMENT

The means with which to support the intelligence-led policing process through technical support and surveillance must be available at all levels of policing.

Meeting the Criteria
There must be access to technical support and surveillance equipment at all levels of policing. BCUs may hold and deploy equipment through their own dedicated technical field capability or force TSU. Level 2 and 3 deployments will invariably be through dedicated covert resources or TSU departments. Access to specialist resources and equipment for all levels will be through agreed authorisation and tasking processes.

83. NATIONAL TECHNICAL SUPPORT UNIT GUIDANCE USED AS A MINIMUM STANDARD (YELLOW BOOK)


Meeting the Criteria
Evidence of compliance with the above standards in the purchase of HOSDB approved equipment, training of operatives and adherence to deployment protocols must be evident. Force TSU managers should ensure that there is access to the appropriate standards manual and that procurement rules are in place to prevent the local purchasing of inappropriate equipment.

84. OTHER STANDARD PRODUCTS

In addition to the defined standard intelligence products, a corporate approach should be taken in the development of processes and documentation for all other intelligence functions.

Meeting the Criteria
Standard processes and documentation for the intelligence function should be corporately agreed and recorded with regard to such issues as the intelligence unit, terms of reference, source tasking, data search, surveillance, prison intelligence, other covert operations, multi/other agency product, CCTV/ANPR and risk assessments, together with the four intelligence products.

85. STANDARDS FOR DELIVERY OF PRODUCT/SERVICES

SLA provide expected standards of service delivery between departments, organisations or for individual operations, for example, between an intelligence manager and an SIO when the intelligence function is in operation during a major crime investigation.

Meeting the Criteria
A policy must be established to convey force minimum SLA requirements.

86. MOU/INFORMATION EXCHANGE PROTOCOLS

Similarly, an MOU should be developed to set out protocols between departments, agencies and organisations enabling effective joint working or partnership arrangements.

Meeting the Criteria
Protocols should be established to determine parameters within which research may be conducted or data secured to enable competent research to be undertaken for recommendations for resolutions to be made. Adherence to such protocols must be evidenced.

87. INTELLIGENCE SPECIALIST, RESEARCH AND ANALYTICAL CAPABILITY TRAINED TO NATIONAL STANDARDS

Sufficient numbers of well-trained intelligence specialists are necessary to carry forward the business of a BCU or force.

Meeting the Criteria
BCU and forces, however limited their establishment of staff, must have access to sufficient numbers of trained intelligence specialists capable of meeting T&CG demands. National Specialist Law Enforcement Centre (NSLEC) training products or any products identified through National Learning Requirement research should be used. Staff must meet the levels of competency required by the Skills for Justice National Occupational Standards, see 4 People Assets.

88. SYSTEM FOR DEVELOPMENT AND REVIEW OF INTELLIGENCE COLLECTION PLANS

Processes should be in place which allow for the development and review of intelligence collection plans in line with the requirements of the T&CG and a method of reporting such actions.

Meeting the Criteria
Reviewing the progress of intelligence collection plans against tactical T&CG actions, refinement and recommendations are to be reported in the tactical assessment. Local systems enabling this standard to be achieved will be evident and reported in T&CG policy.

89. DATA COLLECTION DIRECTED AND FOCUSED ON CONTROL STRATEGY

The control strategy provides a focus for policing activity.

Meeting the Criteria
Police forces and BCUs should be able to demonstrate that the tasking for information and data collection is focused on their respective control strategies. Exceptions to this standard can be considered where directed by the T&CG or SIO with authority during a major reactive enquiry. A policy determining the intelligence research and development capability for a murder enquiry is highly recommended.


90. DEVELOPMENT AND REVIEW OF INTELLIGENCE TRIGGER PLANS

The production of trigger plans used to alert tactical resources to notifiable incidents and to specify response actions, is recognised as good practice.

Meeting the Criteria
A system must be in place to alert tactical resources to respond to a specified set of circumstances using tried and tested methods. Methods adopted should be available from good practice which has been committed to an organisational memory process.

91. ACCESS TO OTHER AGENCIES’ TECHNICAL RESOURCES AND EXPERTISE

Access to technical resources and expertise held by other agencies will provide a valuable additional capability to gather intelligence and evidence.
Meeting the Criteria
This may include databases, CCTV systems and specialist highways, environmental health and licensing officers (see also 2 System Assets).

92. ALIGN JOINT INTELLIGENCE CELLS TO FORCE INTELLIGENCE PROCESS

Joint Intelligence Cells, as described in 4 People Assets, must follow all of the same principles and practices as defined for the force intelligence process.

Meeting the Criteria
Policies and protocols must be in place which define common and corporate processes for Joint Intelligence Cells aligned to the force intelligence model.

93. TASKING CAPABILITY OF WIDER INTELLIGENCE ASSETS

All available resources, both internally and externally, should be used to gather intelligence and be subject to the tasking process.

Meeting the Criteria
Tasking processes should be in place for the wider policing community including PCSOs, Special Constabulary, local authority park rangers, street wardens, NHW, shop watch and river watch. A directory of assets should be recorded and available to staff during intelligence research.

94. IMPACT AND BENEFIT ASSESSMENT

Any authorised intelligence collection and tasking will need to be assessed for its impact and benefits against the overall tactical and strategic direction of the BCU and/or force.

Meeting the Criteria
Local forces and BCUs should consider the use of community impact assessments within the risk assessment process. Operational costs and effective communication and briefing and similar processes need to be subject to analysis and not just identified through a tactical review.

95. DEVELOPMENT OF ENHANCED TARGET AND PROBLEM PROFILES

Intelligence products, such as target and problem profiles must be subject to continual enhancement and development.

Meeting the Criteria
Police forces and BCUs must evidence the use and development of corporate target and problem profile templates. Systems capable of being scanned for crime and incident problems should be in place. Analysis is to include hypothesis on causation and recommendations for resolution.

IMPACTS AND BENEFITS
The impacts and benefits of meeting all of the minimum standards for research and development are outlined below.

Effective Research and Development
An efficient intelligence unit will be able to provide detailed research into authorised targets and problems using the suggested intelligence collection model. This will lead to the development of high quality intelligence products. Access to all available intelligence collection techniques, including surveillance, technical observation, telecommunications analysis and forensic computer expertise will aid this research and may reduce time spent on target file development. First class intelligence products will inform decision making and reduce both risk and investigation costs. The creation of systems and processes which allow for the review of collection plans and which ensure data collection
remains focused on control strategy priorities, will permit a more comprehensive and detailed level of analysis and product delivery according to need.

**Corporate Standards**

Ensuring that intelligence unit functions and documentation are conducted to a corporate standard will enable effective communication between command and analysis and with neighbouring BCUs and forces. This process can be supported by the existence of SLAs and MOUs, particularly when exchanging information between agencies. A corporate response to specific circumstances through the development of intelligence trigger plans will assist the T&CG function. When linked to an organisational memory process, there will be improvements in harnessing and promulgating best practice. This, in turn, will inform policy review. Coordination of the procurement of technical equipment and technology through Force TSU Managers, with adherence to national standards, will prevent unnecessary cost, duplication of purchases and potential health and safety issues. Equipment can also be more effectively assessed and evaluated.

**Skills and Training**

The benefits of having skilled and trained staff within the intelligence unit structure will be borne out by the delivery of high quality, well researched products, in which command teams can have confidence. National training products, while still under development, are available through Centrex, NSLEC and various forces and should be adopted by all intelligence units. A resource formula ensuring establishment levels are maintained will enable more effective planning to meet priority research needs. For further information see 4 People Assets and ACPO (forthcoming) Practice Advice on Resources and the People Assets of NIM.

**The Wider Intelligence Community**

Closer links between the Police Service and external partners will provide a wider variety of information and intelligence sources. Many external agencies have access to technical resources, data and expertise which are of value in intelligence collection. The extended police family of PCSOs, wardens, rangers, traffic wardens, parish special constables, together with volunteer organisations, such as neighbourhood and farm watch are an invaluable source of information. When included in tasking and collection planning the intelligence capability is greatly enhanced. Permanent Joint Intelligence Units, combining police, customs, immigration and other agencies are established in many forces. Experience has shown that where processes which are common to NIM standards are developed, such units function without difficulty.

**96. FORCE POLICY DICTATING CORPORATE STANDARDS OF PRODUCTS**

The defined intelligence products must follow nationally recognised templates.

**Meeting the Criteria**

The standards adopted must reflect NIM operational standard templates for the four intelligence products. For further information see ACPO (forthcoming) Practice Advice on Tasking and Coordination.

**97. FORCE POLICY DICTATING TIMING AND CIRCULATION OF PRODUCTS**

The content and timing of the delivery of strategic and tactical assessments must be synchronised at local, force, regional and national level. A corporate circulation policy is necessary to ensure the appropriate audience for the respective product is reached.

**Meeting the Criteria**

Police force and BCU policies setting out the corporate standards for content reflecting national guidance, timescales and circulation of the intelligence products must be developed in line with ACPO NIM minimum standards. Timing must reflect local, force and regional needs. Business planning cycles will be a significant driver of delivery timings. Confidentiality must be considered and compliance with GPMS must be evident.
98. FORCE POLICING/BUSINESS PLAN INFORMED BY INTELLIGENCE PRODUCTS

Strategic assessments at all levels must inform the policing and business planning processes of a force and BCU.

Meeting the Criteria
Strategic assessments must be used in the business planning process and should be available for chief officer consultation with police authorities to enable issues of resource applications to be addressed, and for BCU commanders during CDRP consultation phases.

99. STRATEGIC ASSESSMENTS

Strategic assessments are vital to the functioning of NIM.

Meeting the Criteria
Strategic assessments must reflect NIM templates and be reported as a minimum at BCU, force and regional levels. Strategic assessments must be used by the strategic T&CG to agree control strategies and intelligence requirements.

100. TACTICAL ASSESSMENTS

Tactical assessments enable effective targeting, tasking and co-ordination based on information that has been provenanced through an analytical process.

Meeting the Criteria
Tactical assessments should reflect NIM templates and be reported as a minimum at BCU, force and regional levels. They should identify priority locations, subjects, crime and incident series and high risk issues in accordance with the control strategy and, in turn, recommend tactical options for prevention, intelligence and enforcement, and suggest potential communications strategies.

101. TARGET/PROBLEM PROFILES ONLY COMMISSIONED BY T&CG, INTELLIGENCE MANAGER OR SIO IN MAJOR ENQUIRY

Target and problem profiles create greater clarity and definition around the respective issues of priority, prolific and recidivist offenders or those suspected of more serious crime and priority locations or crime types. These profiles are as relevant to neighbourhood policing issues, such as problem families or locations, as they are to serious and organised crime groups. Target and problem profiles should, in the main, relate to the control strategy and stated intelligence requirement. In some circumstances the commission of a serious crime, major crime investigation, issues of community concern or identified signal crimes, fall outside of the control strategy remit. In these cases a corporate line of authority for commissioning must be adopted. See ACPO (2005) Practice Advice on Professionalising the Business of Neighbourhood Policing (Draft).

Meeting the Criteria
These profiles must reflect NIM templates. They will be commissioned by tactical T&CGs to determine tactical resolutions; strategic T&CGs to assist with greater definition prior to setting the control strategy; an intelligence manager, in exceptional circumstances, for limited profiling to aid research in accordance with the control strategy, and a SIO in a major or serious crime enquiry to aid the investigation. In all cases a common approach to commissioning must be undertaken. Profiles should be self-explanatory and evidenced by debate with the T&CG chair or SIO and analyst. Detailed documents are only necessary in order to delve in depth to a problem or people to aid resolution.
102. APPLYING THE ANALYTICAL PRODUCTS AND TECHNIQUES

All intelligence products must be subject to a wide range of analytical products and techniques. For further information contact the National Analyst Working Group (details in Appendix 6) and see ACPO (forthcoming) Practice Advice on Tasking and Co-ordination.

Meeting the Criteria
Analytical techniques and products (listed in 7 Research, Development and Analysis) must be used effectively to develop the intelligence products. An appropriate gateway must be established for tasking analysts via the T&CG and/or the intelligence manager. This will ensure the analyst’s product is focused on the intelligence requirement and control strategy and is not used solely for administrative purposes such as performance management. A hypothesis on causation and recommendations for resolution will be included in the intelligence products.

103. MANAGEMENT OWNERSHIP

Chief officers, BCU commanders and senior intelligence managers are responsible for the ownership of intelligence products.

Meeting the Criteria
Directors of intelligence and BCU intelligence managers are responsible for the delivery of intelligence products and corporate publications. Final approval of the relevant strategic assessments must be given by chief officers and BCU commanders. It must not be left to the analyst to compile intelligence products. Senior managers must be given responsibility for different aspects of the products and must ensure the delivery of the necessary information and data to the analyst as determined in policy standards. Available NIM Assets must be used to determine qualified recommendations.

104. PRE-CIRCULATION AND READING OF PRODUCTS PRE-T&CG

The speed and efficiency of the T&CG process is assisted by pre-reading of assessments by attendees.

Meeting the Criteria
Police forces and BCUs must make assessments available in a timely manner, allowing pre-meeting reading time for attendees.

105. ANALYST AS A STANDING MEMBER AT T&CG

The role of the analyst and analytical products are a fundamental part of NIM. An analyst is a key member of the T&CG process. Analysts will provide interpretation of the analysis within the intelligence products that drive the T&CG process.

Meeting the Criteria
Police forces and BCUs must ensure that an analyst is present at all T&CG meetings in order that a qualified interpretation of the analysis can be given and is used in the development of intelligence products.

106. INTELLIGENCE ASSESSMENT FLOWS

The two-way flow of an intelligence assessment between community level and national level via BCUs, force, regions and national organisations is critical to the success of intelligence-led policing.

Meeting the Criteria
BCU assessments must inform the force assessments which, in turn, will inform the regional assessments and United Kingdom Threat Analysis (UKTA) via NCIS. The process must also be reciprocal and operate at both strategic and tactical levels. This will not be simple aggregation
but will be used, in association with other intelligence, to inform the process, in order to determine priorities. Timelines for reporting must be set in policy and met.

107. INTELLIGENCE EXCHANGE

The exchange of intelligence across all boundaries is particularly relevant to target profiles relating to the travelling criminal or in identifying noteworthy trends or themes.

Meeting the Criteria
IT systems must be in place for sharing intelligence products and T&CG outcomes with neighbouring BCUs, forces and regions. This should also include processes for receiving feedback.

108. OPERATIONAL INTELLIGENCE ASSESSMENT

Operational intelligence assessments are key to remaining focused during agreed T&CG tasking. For further information see ACPO (forthcoming) Practice Advice on Tasking and Co-ordination.

Meeting the Criteria
An operational intelligence assessment must take place to ensure that investigations remain focused in order to:

- Prevent mission creep;
- Identify priorities for the operation’s intelligence effort;
- Focus intelligence gathering;
- Inform resource decisions;
- Guide investigative activities;
- Verify that protocols, such as the correct authorisations, are present;
- Highlight diversification from agreed objectives;
- Aid compliance with HRA, RIPA and other legislation.

109. COMMAND TRAINING/APPRECIATION PROGRAMME RELATIVE TO INTELLIGENCE PRODUCTS AND ANALYSTS

Commanders and intelligence managers must fully understand intelligence products and the analytical process.

Meeting the Criteria
A full understanding within command of the analytical role and intelligence products is essential. National, regional or local appreciation programmes relating to intelligence products and analysis are necessary and must be in place. Training packages must reflect the minimum standards listed in this manual.

IMPACTS AND BENEFITS
The impacts and benefits of meeting all of the minimum standards related to the intelligence products element of NIM are outlined below.

Intelligence Products – Standard Format and Delivery
The compilation of standard intelligence products and the appropriate use of archiving will allow the inclusion of standard formats to improve compliance with legislative requirements such as HRA, DPA, RIPA and Freedom of Information Act 2000. The inclusion of human rights obligations in respect of proportionality and justification. Corporate civil liability will be reduced by having justification in place for operational targeting.

Strategic and Tactical Assessments
Strategic assessment products create the ability to engage with policy makers regarding business priorities from a scientific, knowledge-based position. Resource and performance issues, when
aligned with regional and national processes, can be tied to control strategy priorities. New and emerging trends or threats outside the control strategy can be identified by the tactical assessment and then fed back into the strategic assessment. Applying standard analytical products can provide more timely and accurate identification of priority locations and the ability to respond more effectively to emerging issues and series crime and incidents.

**Target and Problem Profiles**
High quality profiling can reduce the criminal justice attrition rate and reduce priority and prolific offending through targeting the correctly identified offenders and problems. Sharing profiles with neighbouring BCUs and forces will lead to better targeting of travelling criminals that do not respect artificial BCU and force boundaries.

**Operational Intelligence Review**
Continual operational review and results analysis can be used by command to aid performance measurement and to develop an organisational memory capability.

**Training**
As with all areas of NIM, the provision of training products to ensure a full understanding of the available analytical techniques and intelligence product development, will enhance the force and BCU capability.

110. **T&CG POLICY**
Tasking and co-ordination is essential to the NIM process and requires policy to be developed by forces.

**Meeting the Criteria**
T&CG policy should detail the key attendees, products and timescales in line with national standards and good practice, reinforcing use of national minimum standards for strategic and tactical assessments and use as a core decision making document by command teams. NIM is not purely focused on crime. Strategic and tactical assessments which have been created using community intelligence as an information source are likely to indicate issues of disorder and social decay as being important areas for local police to take action. This will clearly change the likely direction of decision making at the T&CG meeting.

111. **CONSISTENCY IN T&CG MEETINGS THROUGHOUT THE FORCE**
Co-ordination of T&CG processes to ensure consistent activity will improve intelligence flows and assessments.

**Meeting the Criteria**
Local tasking and co-ordination groups must be arranged consistently to time with the rest of the force and take account of the regional and national picture. Compliance will enable a greater use of intelligence products to inform others and to assist in the collaboration with, and tasking of, external resources.

112. **CHAIRPERSONS**

**Meeting the Criteria**
See standard 44 T&CG Chairs

113. **ENGAGEMENT OF STAKEHOLDERS IN THE STRATEGIC T&CG PROCESS**
Stakeholders and partner agencies play a key role in informing the strategic assessment and influencing strategic tasking and co-ordination processes.
Meeting the Criteria
Police forces and BCUs should evidence the involvement of stakeholders in the strategic process. This may include Police Service or Police Authority representatives at force level, and the chief executive and other key CDRP, Local Safety Partnership Team and/or Drugs Action Team (DAT) representatives at BCU level.

114. INSPECTION
NIM tasking and co-ordination processes require regulation and inspection, in order to maintain standards.

Meeting the Criteria
Police forces must develop a thematic inspection template to assess the effectiveness of T&CG action setting. This must centre on the use of the control strategy and outputs linked to operational performance and reporting at performance reviews.

115. STRATEGIC ASSESSMENT
Strategic assessments must be compiled in accordance with minimum standards.

Meeting the Criteria
Police forces and BCUs must evidence commission and use of strategic assessments as a core decision making document. The assessments will adhere to the national template. The assessment is to be used in business planning processes to enable the setting of force and local priorities as reported in the control strategy. This will also enable resource, funding and communication strategies to be set.

116. TACTICAL ASSESSMENT
Tactical assessments must be compiled in accordance with minimum standards.

Meeting the Criteria
Police forces and BCUs must evidence the commission and use of tactical assessments as a core decision making document. The assessments must adhere to the national template and recommend actions from the menu of tactical options. These options must be adopted in accordance with the control strategy. Target and problem profiles may also be commissioned to aid definition of a problem raised, see 8 Intelligence Products. The tactical assessment will review and amend intelligence requirements according to force needs. It must, however, take account of force control strategy priorities and report on them as necessary.

117. REGIONAL ST&CG AND TT&CG
Tasking and co-ordination must continue into the regional arena to ensure the effective targeting of criminality at levels 2 and 3.

Meeting the Criteria
Police forces must demonstrate active participation in regional ST&CG and TT&CG, in adherence to the ACPO approved protocols.

118. ATTENDEES AT ST&CG AND TT&CG
Key personnel and role functions must attend ST&CG and TT&CG.

Meeting the Criteria
ST&CG should include relevant representation from operations, traffic, crime management, community safety, intelligence analysts and partners. Attendance criteria must be set down in local T&CG policy. TT&CG may include representation from all departments. Attendance need not be rank specific, however, and attendees should have the authority over task-able
resources. Attendees may include partner agencies, CDRP representation and the Probation Service. Security of information and assets, however, must be taken into consideration.

119. SANCTION OF THE CONTROL STRATEGY

ST&CGs must sanction the control strategy.

Meeting the Criteria
Priority issues for prevention, intelligence and enforcement must be identified in the control strategy. The professional heads of the respective disciplines should be consulted and play an active role in ensuring accurate and informed strategies are set.

120. SANCTION OF THE INTELLIGENCE REQUIREMENT

ST&CGs must sanction the intelligence requirement.

Meeting the Criteria
ST&CG provides the principle sanction of a requirement on all staff to secure intelligence to fill intelligence and knowledge gaps in line with the control strategy. This requirement must be reviewed and amended according to need, by the TT&CG.

121. MINIMUM 6-MONTHLY REVIEW OF ST&CG

The setting of strategic direction requires review to ensure that the appropriate policing focus is maintained.

Meeting the Criteria
The ST&CG must sit every 6 months with the minimum of a paper review at 3 monthly intervals. The meetings must review the control strategy and amend this as necessary, taking into account performance, effectiveness of the strategies set, emerging threats, and trends and resource capability.

122. BRIEFING POLICY

The actions set in accordance with the tactical menu must be delivered to the patrol and investigative function through effective briefing.

Meeting the Criteria
Minimum standards for briefing must be adopted, including strategies and effective delivery mechanisms, see *ACPO (forthcoming) Guidance on the National Briefing Model*. Daily management meetings, briefings and LAG meetings are not a T&CG meeting as they are not driven by the intelligence products review. These informal tasking meetings may use remote conferencing facilities due to the geography of a BCU. Daily meetings should be chaired by a local commander or their deputy and reinforce and maintain the focus of TT&CG decisions. Briefings should be conducted by the appropriate operational lead and inform designated teams of their tasking requirement while LAGs should be chaired in accordance with partnership arrangements and inform the T&CG process.

124. LEVEL 2 RESOURCE ALLOCATION CRITERIA

The allocation of finite level 2 resources should be governed by set protocols.

Meeting the Criteria
There should be a transparent policy and decision-making process in place for the application and allocation of level 2 resources primarily in support of priority issues reported in the force control strategy or in support of major investigations. BCU command representation at either level 2 T&CG or resource forum is highly recommended.
IMPACTS AND BENEFITS
The impacts and benefits of meeting all of the minimum standards related to both the strategic and tactical tasking and co-ordination elements of NIM are outlined below.

**Strategic Direction**
Effective ST&CG processes which use well-defined intelligence products will create a better informed Police Service with a greater understanding of the risks to performance and efficient service delivery. Informed strategic direction will lead to improved planning processes. The adoption of minimum standards for ST&CG will focus operational strategies on key priorities, CHIS recruitment according to need, forensic resources to locations, and people and patrols to hot spots and priority locations. The ST&CG maintains the currency of control strategies and allows flexibility to include emerging trends or issues. Well-informed strategic direction will enable and drive data sharing requirements for common and justifiable aims.

**Tactical Delivery**
Compliance with TT&CG minimum standards and disciplines will lead to more officers being focused on targeting the most active criminals, patrolling locations of the highest priority and collecting intelligence on key needs. Maintaining focus through strong co-ordination will ensure operations are only commissioned where necessary. The consequential improvement in planning will lead to greater officer safety and more effective deployment of resources. Tasking forums provide a platform for better organisational communication, briefing and feedback of information.

**Partnership Integration**
Tasking processes, particularly at the strategic level, should include full integration with partnership arrangements. Involvement of local politicians in ST&CG will ensure overview and understanding of operational and resource conflicts. Improved integration in the tasking and co-ordination process with partner agencies, i.e., DATs/drug reference groups, youth crime offender teams and other local authority bodies will enhance action setting linked to partnership development and joint ownership. Partnership involvement will assist with the development of reassurance programmes by engaging partners through the application of the tactical menu. The adoption of these minimum standards reinforces the principles of the CDA.

**Performance**
Effective tasking regimes, creating high quality targeting processes will lead to improved quality of prosecution case files and the reduction in, and increased conviction rates for, recidivist offenders. Results analysis used by command to aid performance review and develop organisational memory will create greater understanding of resource capabilities. This will enable forces and BCUs to link T&CG decisions and outputs to performance. Robust tasking and targeting sanction will provide auditable processes leading to improved legislative compliance, for example, HRA and greater public satisfaction. Inspection regimes will maintain standards.

**National Perspective**
Ensuring the full integration of tasking and co-ordination and delivery of strategic assessments at local, force, regional and national level, will enable government to produce informed priorities through the National Threat Assessment. The implementation of level 2 tasking policies will also lead to greater effectiveness in managing cross-border criminality between BCUs and forces.

125. INVESTIGATIVE CAPABILITY
A dedicated tactical investigations team is necessary to ensure effective resolution of core priorities.
Meeting the Criteria
There must be evidence of a tactical investigative capability able to meet the tasking requirements of TT&CG, both at force and BCU level. Establishment numbers of such teams is not prescribed but staff must be trained to a high level of investigative skills.

126. RED CIRCLE POLICY

Intelligence staff members need to be dedicated to fulfilling T&CG actions and to retaining the profile of control strategy priorities. In addition specialist intelligence roles must retain a position of covertness.

Meeting the Criteria
Policy must be implemented which prevents the use of intelligence staff for other functions unless very exceptional circumstances dictate. This policy will include analysts, intelligence management, briefing and co-ordination and those in covert roles, i.e., CHIS handling, surveillance and TSU.

127. TACTICAL CAPABILITY

TT&CGs must be aware of available tactical capability to ensure there is a balance of work and tasking in accordance with the tactical menu.

Meeting the Criteria
Police forces and BCUs must evidence the following capabilities as being present:

- Sufficient tactical and operational capability to respond to fast time intelligence and tactical resolution through a fast track process;
- A high visibility patrol capability and general policing or sector options;
- Access to covert resources, i.e., surveillance, test purchase and undercover;
- Tactical traffic management options;
- Mutual aid agreements with neighbouring BCUs and forces on a regional or national level through force and regional TT&CG structures;
- Capability to provide operational response to ANPR operations;
- Crime reduction/prevention resources to assess and review reduction and prevention opportunities.

128. TACTICAL PLANS

Tactical plans must be developed by owners appointed and tasked by the TT&CG.

Meeting the Criteria
Tactical plans must accord with the tactical menu and control strategy priorities. Inspection will evidence compliance as recorded in TT&CG minutes and action setting. Copies of plans developed in a corporate style must be retained in force organisational memory systems.

129. TRIGGER PLANS

Trigger plans allow for instant, controlled and co-ordinated response to particular events, incidents or crime types.

Meeting the Criteria
Trigger plans must be in place to direct response capability to undertake certain tasks on the occasion of a particular event or circumstance occurring.

IMPACTS AND BENEFITS
The impacts and benefits of meeting all of the minimum standards related to the tactical resolution element of NIM are outlined below.
Response
The use of T&CG will create a co-ordinated response inclusive of all resources available within the organisation, as well as providing access to the resources of other agencies. The ability to make faster and more accurate decisions, guided by the control strategy and intelligence requirement, will mean that forces can make a more timely response to operational problems or targets at all levels of operation. This will also lead to the earlier arrest of offenders.

Professional Investigation
Implementation of the minimum standards for tactical resolution will lead to dedicated tactical investigation teams. These dedicated teams will lead to better performance in terms of improved evidential standards, reduced attrition rates and increases in the detection rate. The direction offered through T&CG will enable forces to focus on gaining the best evidence of worst offences to help secure more convictions. This should, in turn, have a qualitative impact throughout the criminal justice system.

130. RESULTS ANALYSIS AND REVIEW
Results analysis is an analytical technique which can be used to inform the NIM process. It should be used to assess the success of actions endorsed by the T&CG.

Meeting the Criteria
T&CG commissioning of results analysis and operational review must be evidenced. Recommendations must be reflected in tactical assessments and operational plans and the organisational memory updated. This is particularly necessary when using technology or after a failed operation.

131. MONITOR AND REVIEW OF RIP A AUTHORITIES
The usefulness of information gained as a result of RIPA authorities will also require review, and policies will need to be in place to guide this process.

Meeting the Criteria
Forces must undertake a proactive review of RIPA authorities and ensure that the retention policy is adhered to. This is usually a function of the person or team with responsibility for the management of authorities, see standard 46 Authorities Management. Intelligence gained under an authority is usually located elsewhere (see standard 38 Surveillance Product) but will be subject to assessment and input on to the intelligence function as required.

132. NATIONAL BRIEFING MODEL
The ability to brief and debrief effectively is critical to the success of intelligence-led policing. The essence of NIM is to tailor the response to the problem in hand. This is inherently difficult to achieve if officers are not briefed as to what and where the problem is. Conversely, it is difficult to identify and address problems with any degree of success if debriefing systems are ineffective. In order to maximise the usefulness of harvested intelligence, effective briefings and debriefings are essential. See also ACPO (forthcoming) Guidance on the National Briefing Model.

Meeting the Criteria
A standardised and structured briefing/debriefing process, using the National Briefing Model, must be implemented. This will ensure the effective tasking and briefing of the patrol function and enable assessment of intelligence product accuracy and timeliness and also allows gap analysis to improve the product.

133. ORGANISATIONAL MEMORY
The evaluation of the outcomes and processes of operations should be fed into corporate knowledge. This will improve the expertise of staff involved and lead to the improved effectiveness of future operations.
Meeting the Criteria
Operation logs, operational reviews and case histories should all be examined. The results and analysis of this examination must be added to the organisational memory through the NIM process and in line with control strategy objectives or emerging high risk issues. A system for monitoring and reviewing tactical decisions, operational plans and results ensures that operational and intelligence tasking is compliant with the HRA. It also provides an audit trail for subsequent scrutiny. Police forces must have in place systems for recording, monitoring and reviewing tactical decisions, operational plans and results to ensure that operational and intelligence tasking is compliant with the HRA. The subsequent audit trail will then be suitable for later scrutiny by third parties.

135. COMMUNITY IMPACT ASSESSMENT REVIEW

In order to fully assess the impact and success of operations it is necessary to consult with partner agencies and the wider community. This is especially important where operations are in response to locally identified problems.

Meeting the Criteria
There should be evidence of the use of community impact assessments as part of the results analysis. This will include such questions as:

- Was activity implemented as planned?
- Did the problem change after activity?
- Why was this?
- Did activity cause displacement?
- Did new offenders move in?

This will evidence that forces have worked with partners to establish the impact on the community of actions implemented.

Impacts and Benefits
The impacts and benefits of meeting all of the minimum standards related to the intelligence/operational review element of NIM are outlined below.

Better Learning and Development Opportunities
The evaluation aspects of operational review within NIM will mean that the relevant skills needed by police staff will be identified at an early stage. This knowledge will then inform the decision-making process for the distribution of human resources within NIM. Such evaluation will also allow for the identification of knowledge gaps for individual staff or groups of staff, allowing focused and relevant training programmes to be developed. The conduct of an operational review gives the opportunity to recognise good work. Positive feedback within the organisation will improve motivation and engender more thought and attention being given to the production of intelligence reports, and errors being corrected quickly and easily. Effective review also avoids the situation where the same mistakes are repeatedly made, improving the organisational memory, processes and performance.

Increased Availability of Good Practice
The implementation of an operational review process will lead to improved arrangements for harnessing, assisting and promulgating good practice. Appropriate and timely recording and dissemination of good practice will mean officers have ready access to corporate memory and a knowledge base. In this way the identification of good practice can be used to create better operational solutions and improve the formulation of operational policing policy. The increased availability of good practice increases learning ability, avoids duplication, reduces costs and subsequently improves operational effectiveness.
Improved Operational Effectiveness

The use of operational review creates an in-built audit trail of operational decision making and its results. It also leads to a more informed response to incidents. The learning that comes from the review process will lead to improved arrangements for exploiting scientific and technological advances to assist in reducing crime, and add further to improved operational effectiveness.

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This excerpt from Appendix 2 of the ‘Guidance on the National Intelligence Model’ (ACPO/Centrex, 2005: 111-159) is a faithful reproduction with the minor exceptions of editorial amendments to correct grammatical errors.