



INTERPOL



WAPIS GUIDE

STANDARD OPERATING PROCEDURES AND RULES
FOR ENHANCING AND MAINTAINING QUALITY
IN THE WAPIS DATABASE



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REFERENCES

- › WAPIS DACORE Organisation and Operating Guide - October 2019
- › Best Practice Guide on Personal Data Protection - June 2020
- › Data Quality Management System Guide - November 2020

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PREAMBLE

WAPIS aims to increase the efficiency of law enforcement agencies involved in preventing and fighting transnational crime and terrorism in beneficiary countries through enhanced management and sharing of police data.

The WAPIS programme is being implemented on three levels:

- › **A national level, with the creation of a national database in each beneficiary country allowing all competent national authorities to collect, record and exchange relevant police data;**
- › **A regional level, through the establishment of a regional platform for countries to share authorized police data from their national databases;**
- › **A global level, where each national database will have access to INTERPOL's global databases via the I-24/7 communication system.**

A Data Quality Management System Guide has been drawn up by INTERPOL, giving a comprehensive explanation of how quality may be integrated into the Programme, and the strategic architecture that will accompany it.

This document proposes the operating rules for the above-mentioned Guide and is designed to be used as a template for drawing up each national Standard Operating Procedure concerning quality management. In other words, this Standard Operating Procedure (SOP) specifies how to ensure quality in the WAPIS programme in each country and entity concerned.

Only the new terms introduced into this procedure by the Data Quality Management System Guide are set out below as a reminder. For all other subjects, please consult previous documents.

› **Continuous improvement**

The continuous improvement process is an essential pillar of the quality approach. This recurrent activity is conducted to improve performance by taking account of any gaps and ensuring that they are rectified – as well as in any similar cases discovered – and to anticipate where they may reoccur.

› **Gap**

Il s'agit d'une erreur qui peut être confrontée à une norme prédéfinie. Une erreur relevée dans le programme SIPAO non conforme aux règles définies par des lois, règlements, documentations techniques, juridiques, fonctionnelles est donc un écart.

› **Quality**

Data quality is traditionally defined as the measure of the condition of data.

Quality is based on a number of combined factors: adaptation to need, accuracy, completeness, homogeneity, reliability and timeliness. Measuring the level of data quality helps to identify errors. Such errors must be corrected.

The aims of the information system in question determine the quality of data: specific aspects of this system include lawfulness, confidentiality, traceability, etc.

GLOSSARY

› **Quality criteria**

- Lawfulness
- Fairness
- Transparency
- Purpose limitation
- Data minimization
- Accuracy (quality of the data)
- Rights of access, correction, deletion and objection
- Limitation of the data retention period
- Availability
- Confidentiality
- Integrity
- Traceability (allowing for audits)
- Adequate training
- Raising everyone's awareness.

› **Quality Supervisor**

The quality supervisor's role, preferably based on competencies and professionalism (rigour, integrity, honesty, availability, and diligence, etc.), is to oversee the introduction and monitoring of the procedures set out in this guide. He/she is not a superior, but performs an advisory and consulting role in decision-making, while management is responsible for implementing the decisions. The quality supervisor is trained for this purpose.

It may be useful to choose the quality supervisor from among the validators. If there are no volunteers, a supervisor is nominated within each entity.

› **Quality Management System (QMS)**

A Quality Management System (QMS) is a management and control system. Introducing such a system is a strategic decision.

The QMS specifies all the activities that have been or need to be implemented by combining processes and resources. Its purpose is to maintain the continuous improvement of results and performance.

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QUALITY RIGHTS AND OBLIGATIONS

4.1. RIGHTS OF THE DACORE

As a national point of contact, the DACORE is responsible for granting entitled territorial departments prior authorization to access the databases.

Since the DACORE is responsible for conducting final checks on the lawfulness and quality of data in the “drafts” submitted by entry operators, it may impose certain restrictions on accessing the information contained in the database.

Similarly, the DACORE specifies the necessary criteria of data quality based on legal and regulatory requirements.

4.2. OBLIGATIONS OF THE DACORE AND OF AUTHORIZED USERS

› 4.2.1. DACORE Director

He/she must ensure that:

- before granting a right of access, the entitled entity possesses all the necessary attributes for authorization;
- the access granted will be used in the framework of criminal investigation or administrative police duties;
- the persons authorized to use the WAPIS information system have received suitable training;
- these same persons comply with the national legislation in force, particularly regarding data security and confidentiality, and the protection of personal data.
- the information provided by the DACORE is accurate, relevant, and up to date;
- any breach of data is remedied as soon as possible and that the notifications required are carried out in conformity with the regulations in force on the protection of personal data;

- requests by the people concerned regarding their rights of access, correction, deletion and objection to the processing of their personal data are dealt with within a reasonable period;
- if needed, requests from the personal data protection authority are responded to on an ad hoc basis;
- the security of the WAPIS System is guaranteed and preserved;
- the various registers are kept up to date.

› 4.2.2. Authorized users

Authorized users must:

- comply with the relevant national legislation, including the protection of personal data;
- contribute to ensuring that the information kept in the system is always up to date, accurate and valid;
- in a spontaneous manner, immediately inform their superiors if they notice or are informed of any error, missing information, failure or intrusion.

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BEST PRACTICES AND PROCEDURES TO BE FOLLOWED

5.1. QUALITY CONTROL PROCESS

Under the supervision of the directors of the DACORE centres, quality control is carried out on several levels.

› 5.1.1. Data entry operator

Quality is necessary when data are first entered in the WAPIS system.

Data entry operators will have been previously trained on the position's requirements and will be aware of the sensitive nature of the operations entrusted to them. They take care to check data before their input, e.g. "Offence code/ Offence type" must be consistent with the summary of facts; "Type of measure/ Category of measures" must be consistent with the summary of facts.

Operators must faithfully reflect the terms of the report they are entering in the system. The report is meant to have been drafted in conformity with the national legislation and approved by the competent authorities. However, if for any reason the operator thinks that the report is not in conformity with the WAPIS system, he/she is entitled to refuse to enter any non-compliant or incomprehensible content. Once the operator has used all means possible to confirm that the content is incorrect, he/she will inform the supervisor who will approve or deny any refusal to record the data. The validation request will be forwarded to the "validator" who should usually be able to judge the grounds for the refusal and subsequently allow or deny the request.

Any disputes are brought to the DACORE director's attention, who will ultimately arbitrate on the matter.

› 5.1.2. Validator

The validator's role is essential for ensuring the smooth final entry of data. He/she is trained for this role and is aware of its sensitive nature. The validator constitutes a second level of verification of data quality, requiring a permanently critical approach, based on the quality criteria previously defined.

The validator is entitled to refuse to approve any data he/she rules are non-compliant. He/she checks the origin of the quality gap with the operator. In the event of an error or oversight, the validator returns the data to the initial

department with comments to allow it to make the necessary corrections. After the corrections have been made, the data are resubmitted for the validator's approval.

Any disputes are brought to the DACORE director's attention, who will ultimately arbitrate on the matter.

› 5.1.3. Quality supervisor

The quality supervisor is trained for this task. Monitoring the quality process is a part-time role while the rest of the time is devoted to the main duties of validator, for example.

The quality supervisor is the contact point for operators and validators on matters concerning quality. He/she assists the DACORE director in the quality process, proposing solutions for continuous improvement, and arranges for training of various staff members. He/she keeps the training indicators up to date and helps the DACORE director maintain the performance and activity indicators that are inherent to data quality.

The quality supervisor is responsible for monitoring legal and technical developments related to quality, relying on a DACORE committee of experts (professional, legal and technical) for this purpose. He/she contributes to the annual rapport of the DACORE by drawing up an overview of, among others, quality-related activities over the past year.

› 5.1.4. Technical administrator

The rule of employing two technical administrators in each DACORE is to provide back-up and ensure one administrator is always present during periods of absence.

The technical administrators are responsible for granting (or withdrawing) access rights to the databases, for managing roles and supervising the information system.

They also constantly check the validity of search records and delete any expired records, after checking that all the necessary action has been taken.

Their role therefore has an impact on the security of the system and on quality, in its wider sense.

› 5.1.5. DACORE Director

The director's primary role is to ensure the staff members under his/her responsibility are able to work in the best possible conditions that are conducive to contributing to the data quality.

He/she is fully responsible for the lack or deterioration of data quality. He/she encourages the passing on of information and publicizes the existence of gaps in quality with a view to fostering continuous improvement.

He/she is the final arbiter in any disputes brought to his/her attention.

The director integrates into the quality process all factors that could contribute to continuous improvement, such as the passing on of internal information, inspection and audit reports, etc.

He/she ensures that the performance and activity indicators provided are kept up to date, and proposes new indicators, if needed.

The director submits an annual activity report when requested by his/her administration, or on his/her own initiative, including quality-related aspects.

5.2. INTRODUCTION OF QUALITY INDICATORS

Indicators are essential for monitoring the quality process. They are based on all the indicators used by the DACORE, extract certain data and provide an overview of quality. The main data quality indicators are:

› 5.2.1. Staff monitoring indicators

- › **Ratio: number of employees having received quality training / total number (annual variation);**
- › **Ratio: number of employees who have received further training / number of trained staff.**

› 5.2.2. Quality level indicators

- › **Ratio: number of new arrivals, departures and current staff members;**
- › **Ratio: number of gaps observed / number of records processed (annual variation);**
- › **Ratio: number of claims observed / number of records processed (annual variation);**
- › **Comparison of these ratios related to the training of staff members.**

› 5.2.3. Control indicators

- › **Ratio: number of validators / number of operators;**
- › **Number of inspections carried out;**
- › **Number of audits conducted.**

› 5.2.4. Quality Dashboard

The DACORE director keeps the Quality Dashboard up to date using the key indicators at his/her disposal and enters them in a more general dashboard. The Dashboard is regularly updated on a weekly, monthly or quarterly basis depending on the administrative customs, and is then presented at intervals, every quarter, six months, or a year.

A dashboard's quality, strictly speaking, can be measured by the ease with which it can be read and a reduced number of relevant indicators (see templates provided in the Guide referred to above).

5.3. INSPECTION AND AUDIT PROCEDURES

Inspections and audits differ in two ways: an inspection is unexpected and coercive, and its findings are delivered well after it is conducted; however, an audit is announced in advance and is participative, where the initial findings are delivered immediately after the audit and cannot be subsequently modified, even if they require further explanation.

The Administrator provides all the means necessary to ensure that inspectors and auditors can properly conduct their mission, and ensures that their guidelines are observed.

All staff members participate in the smooth running of an inspection or audit, by facilitating access, and by replying honestly in a collaborative manner to any questions asked.

An audit is recommended at least once a year. The internal or external departments must conduct an inspection as soon as a leakage, theft, misappropriation or a manifest error of data has been reported to the relevant authorities.

The conclusions of the inspection or audit are sent to the DACORE director who ensures they are implemented according to an action plan provided, or one proposed by the director. The director informs his/her employees according to the customary rules.

Except in an emergency, the administration responsible for the inspection will request a comprehensive overview of the situation of the DACORE at least once a year, addressing the data quality issues, detailed action plans, specifying the conclusions and the difficulties encountered while remaining completely objective.

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DELETION OF DATA

6.1. COMPLIANCE

The period for retaining personal data depends on the retention period provided in the relevant legislation in each country and/or the data processing purpose which has not been fulfilled.

Certain data must be deleted within a specified period, particularly all the records marked "wanted", such as persons, vehicles, administrative documents, weapons and sundry items, as they are temporary in nature.

The continuous updating of the database is the technical administrator's role: he/she alone is entitled to delete such data after checking that all the necessary action has been taken.

6.2. OTHER CASES

Other legal provisions must also be taken into account, such as when a type of offence is deleted, an inaccurate record is belatedly discovered, or data on offences for which the statute of limitations has expired, etc.

In these clearly documented cases, processing should follow the same procedure as used for inaccurate or missing information: once the DACORE has obtained the internal director's approval, it will inform the initial department. This information includes comments enabling the necessary corrections to be made.

Once corrected, the data are re-entered.

A record of these exchanges should be kept for subsequent checks as to whether suitable action has been taken.



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