



National Fingerprint & Footwear Strategic Board

NPCC Framework for Footwear Coding

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Section 1. Overview & Purpose

This document has been produced by an Expert Network following discussions with the Forensic Science Regulator and recommendations agreed by the National Fingerprint and Footwear Strategic Board. It provides a framework for all police staff and forensic units who undertake footwear coding activities to provide intelligence to support the investigation and detection of crimes and outlines those activities that must be undertaken by Police Forces and Forensic Service Providers in line with the Forensic Science Regulator Act 2021 and statutory Code of Practice (the Code). For the purposes of this Framework, Footwear Coding shall include only the use of pattern code information to link scenes. Where a visual or physical comparison of marks from scenes with those from other scenes or with footwear is made, this shall class as Footwear: Screening or Footwear Mark Comparison.

As set out in the Code, footwear Forensic Science Activities (FSA) identified as FSA – MTP201 – Footwear: Screening and FSA – MTP202 – Footwear Mark Comparisons must be accredited to BS EN ISO/IEC 17020 or 17025, as appropriate. The Code allows an alternative approach to accreditation to be taken for FSA – MTP200 – Footwear: Coding and this framework is provided as that alternative.

This document identifies, but not exhaustively, the risks of undertaking this FSA without being accredited in the risk register (Appendix 3). One of the key ways to mitigate such risks is to understand from the outset that items to be examined for footwear coding must be handled in the same way and with the same precautions as for other forensic examinations; risks can be mitigated to varying degrees by standard operating procedures, competency, training, and awareness.

The Forensic Science Regulator considers Footwear Coding to be a forensic science activity under the Statutory Code, therefore, it is subject to the same obligations to implement quality standards and accreditation as any other area of forensics. However, the Regulator will allow

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footwear coding to be undertaken in the absence of accreditation provided the forensic unit adheres to the NPCC Framework for Footwear Coding and demonstrates such. The Regulator can withdraw this dispensation at any time, defaulting to a requirement for accreditation to ISO 17025

Forensic units must either have accreditation to BS EN ISO/IEC 17025 or adhere to this framework to undertake footwear coding; it is not an option to conduct this activity with neither of these in place.

The Framework includes the following requirements:

- a. The forensic unit shall follow documented methods;
- b. The forensic unit shall record and maintain competence of personnel it authorises to conduct this FSA;
- c. Practitioners adhere to the practices set out in the NPCC Framework for Footwear Coding;
- d. The organisation will make a declaration that they are adhering to the NPCC Framework for Footwear Coding, rather than holding accreditation.

In the Statutory Code of Practice, footwear FSAs are defined as follows:

FSA-MTP200 is defined as Footwear: Coding – the provision of information to link incident scenes through the consideration of footwear impressions recovered from those various scenes.

FSA-MTP201 is defined as Footwear: Screening - the analysis of whether or not items of footwear or known prints from pertinent footwear could have made footwear marks recovered from one or more scene, with a view to recommending whether or not a comparison is carried out. The FSA specifically notes that this does not include an assessment of evidential strength (which is included under FSA-MTP202 Footwear Mark Comparisons).

FSA-MTP202 is defined as Footwear Mark Comparisons – the analysis to determine whether or not items of footwear could have contributed to the generation of footwear marks recovered from one or more scene, and the evaluation of evidential strength.

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Section 2. Training

It is a requirement of this framework that staff undertaking coding activities must have received training, covering areas such as those detailed below¹.

2.1 Roles in the Footwear Unit

- Introduction to the role and other roles in the forensic unit and wider organisation
- Overview of the principles of the Code & the role of the FSR
- ISO 17025 standard and how accredited footwear units operate

2.2 Forensic Awareness and Evidence Handling

- Contamination issues and avoidance of contamination
- Trace evidence
- Continuity, security and integrity of exhibits
- Preservation, packaging and labelling of exhibits
- Safe handling to reduce the potential loss of evidential material
- Submission requirements including information required
- Rejection of submissions

2.3 Footwear Mark Formation

- How footwear marks are made
- Different types of footwear marks
- Quality of footwear marks
- Pattern variation between sizes
- Configuration differences
- The result of wear and how this changes over time

2.4 Relevant Legislation and Regulations

- Impact of relevant legislation and regulations on the taking, retention, searching and destruction of footwear impressions and exhibits
- Where to access detailed information and advice with the forensic unit or wider organisation
- Legislation may include, where appropriate to the forensic unit: PACE, CPIA, PoFA, UKGDPR and MoPI

¹ The College of Policing Footwear Examination Programme includes the topics listed in its Stage 1 Coding and Intelligence module.

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2.5 Coding

- Overview of the process of examining and coding footwear marks
- Imaging and lighting techniques
- Use of the National Footwear Database and National Footwear Reference Collection or other databases used by the forensic unit
- Factors such as clarity and extent of the mark, movement when the mark was made and the background surface
- Overview of cognitive bias and its mitigation, as applicable to footwear coding
- the limitations of their role when undertaking an initial assessment to code the marks

2.6 Recording and Reporting the Footwear Coding Process

- Explanation of the various methods which can be used to record and report findings including intelligence reports, spreadsheets, forensic case management systems, MG22A and the NFD
- Dissemination of intelligence
- Disclosure

2.7 Recent Developments and Their Impact on Professional Practice

- Update on recent developments in the footwear profession
- Awareness of strategic and practitioner groups as appropriate
- How to maintain up-to-date knowledge and undertake self-development

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Section 3. Demonstration of Competence

3.1 Initial Competence

Throughout the training outlined in Section 2, knowledge checks and an ongoing process of informal assessment should be carried out. Towards the end of the training, assessments must be carried out to demonstrate the competence of the trainee. These assessments may take the form of question-and-answer sessions, written knowledge checks or practical exercises as appropriate. The trainee must also demonstrate competence in the workplace, before being signed off as competent in accordance with local procedures. Staff will be provided with a mentor throughout their training and in the initial stages of their role after gaining competence. Where necessary, this mentor could work in a forensic footwear unit in another organisation.

3.2 Ongoing Competence

After being signed off as competent, staff should demonstrate their ongoing competence to undertake footwear coding activities. Methods to demonstrate ongoing competence may include, but are not limited to:

1. Completing a minimum number of examinations per year to be defined by the forensic unit;
2. Undertaking training and CPD and recording this on a training and competence record;
3. Submitting examinations for peer review or dip sampling by other competent individuals, either in the forensic unit or in another organisation;
4. Reviewing the results of work submitted for screening or footwear comparison and evaluating against the coding outcome;
5. Undertaking annual ILC and/or PT, if available; NFOG has a sub-group which provides ILC for coding which would be suitable for this purpose.

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3.3 Risk Factors

Risk factors will be taken into account, when assessing the initial and ongoing competence of footwear coding staff. Risk factors include the experience of the member of staff and the frequency with which the activity is undertaken.

3.4 Loss of competence

Where any of the above activities demonstrate that the member of staff may no longer be competent, if the member of staff has been absent from their role for an extended period or where issues arise in the course of normal working, consideration should be given as to what action should be undertaken in accordance with local procedures.

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Section 4. Reporting the Results

Results of footwear coding may be recorded and disseminated using a variety of methods, including intelligence reports, local spreadsheets, case and crime management systems, the Streamline Forensic Reporting process and on the NFD.

It must be clear to the users of any results that the forensic unit are not accredited to ISO 17025 for footwear coding but are adhering to the NPCC Framework for Footwear Coding. A message may be included on the forensic unit web page, within the case management system or in relevant emails. Alternatively, where reports are produced, a declaration should be included, as follows:

I confirm that, to the best of my knowledge and belief, I have acted in accordance with the NPCC Framework for Footwear Coding [insert issue] as required by the statutory Forensic Science Regulator.

4.1 Use of SFR

The National Guidance for Streamlined Forensic Reporting, FCN-SP-MGT-GUI-0003, stipulates that the SFR process can be applied to the reporting of footwear information, intelligence and evidence at each of the three key stages of footwear analysis, in line with the College of Policing licensed training, namely Coding, Screening and Evidential Reporting. The extent and limitations of the examination or comparison conducted should be clearly stated in the SFR without diluting the value of the information.

The MG22A should be used for all stated facts regarding the identification of a pattern and for intelligence, including potential linking of scenes.

For all levels of footwear examination undertaken, the activity should only be undertaken by staff who have received appropriate training and have been deemed competent; the level of training and competence must not be overstepped.

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Section 5. Governance and Escalation Process

5.1 National NPCC Governance structure

There is currently an established governance structure within the forensic footwear discipline. Practitioners meet regularly at the National Footwear User Group (NFUG), which reports into the National Footwear Operations Group (NFOG), which in turn reports into the National Fingerprint and Footwear Strategic Board (NFFSB) chaired by the NPCC Fingerprint and Footwear Lead. This structure will be used to monitor footwear activity and ensure that this framework is being followed, accreditation is in place where required and issues are escalated as appropriate.

5.1.1 National Footwear User Group

The NFUG is chaired by the FINDS NFS & DNA Operations Manager and facilitates the discussion of issues relating to the use of the National Footwear Database (NFD) and National Footwear Reference Collection (NFRC). Suggestions for changes and improvements to both systems are agreed by the group. Other practitioner issues, including availability of training, emerging supply issues, technology and capacity issues are discussed. Minutes of the meetings are issued by the FINDS NFS & DNA Operations Manager. In addition a quarterly National Footwear Service Trend Report is produced by FINDS, detailing the use by forces or collaborations of the NFD and NFRC, including submission of new patterns, rejected submissions, active users and access levels and trends from the previous quarter. The report highlights good news stories relating to footwear intelligence as well as any emerging risks or issues. The FINDS Footwear Data Management Team will record on the NFD when patterns submitted for inclusion or update have been mis-coded or descriptors wrongly assigned and notify the submitting force. Details will be included in the trend report and the FINDS NFS & DNA Operations Manager will monitor such incidences and escalate as appropriate.

5.1.2 National Footwear Operations Group

The NFOG is chaired by the National Forensic Footwear Lead, with the FINDS NFS & DNA Operations Manager sharing minutes of the NFUG with NFOG members and providing an update as a standing agenda item. The group comprises representatives from NPCC regions, as well as representatives from the College of Policing, the Forensic Capability Network and BlueStar (the IT

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company which designed and maintains the NFD and NFRC). Regional representatives are at the level of Forensic Leaders or Footwear Unit managers rather than practitioners, although often they are practitioners as well. Issues can be escalated from the NFUG to the NFOG and delegated from the NFOG to the NFUG. The NFOG discusses issues including UKAS & Accreditation including the Forensic Science Regulator requirements within the codes; training; R&D; NFD & NFRC issues; national updates, including the FCN; Streamlined Forensic Reporting; and marketplace and supplier issues. In addition, the NFOG supports an inter-laboratory proficiency testing network comprising a number of forces who administer coding, screening and evidential tests in a round-robin arrangement. Monitoring of footwear coding and the use of the framework will be a standing agenda item at this meeting. This will include updates from regional representatives about activity in their region, review of the National Footwear Trend Report and associated information provided by the FINDS NFS & DNA Operations Manager, and discussion of any emerging issues.

5.1.2 National Fingerprint and Footwear Strategic Board

The NFFSB is chaired by the NPCC Fingerprint and Footwear Lead, with the National Forensic Footwear Lead providing a highlight report and an update as a standing agenda item. Members include regional forensic leads, chairs of other accountable groups, including the NFOG, College of Policing, FINDS, Home Office Biometrics programme, the FCN, DSTL and the FSR Office. The agenda includes highlight reporting from each of the groups or organisations represented as well as identification and consideration of risks and decision-making related to relevant issues. Issues can be escalated from the NFOG to the NFFSB and delegated from the NFFSB to the NFOG.

5.2 Forensic Service Provider contract management

All forces who submit their footwear coding activities to another forensic unit, either in another force or a forensic service provider, will include a requirement in the contract, Service Level Agreement or Memorandum of Understanding, that the forensic unit undertaking the footwear coding activity must either adhere to the NPCC Framework for Footwear Coding or hold accreditation to ISO 17025 for this activity.

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5.2 Quality Management System

All forensic units who will undertake footwear coding activities will sit within an organisation which holds accreditation to ISO 17025 or 17020 for at least one forensic discipline already and, as such, will have a Senior Accountable Individual, Quality Management System and an associated governance structure. It is a requirement of this framework that non-conformances are dealt with following the internal processes detailed in the QMS.

5.3 Escalation

Issues relating to footwear coding activities will, when deemed necessary, be reported by forces² to the NFUG, NFOG or NFFSB as appropriate. Issues reported to and considered by the NFUG, NFOG and NFFSB will be recorded in the minutes of these meetings and can be escalated up through the governance chain, ultimately to the NPCC Fingerprint and Footwear Lead and/or FSR or can be delegated down the chain for tactical action. Representatives from the FSR Office sit on both the NFOG and the NFFSB so will be aware of issues that are raised.

Where an issue is identified by or raised to the NFOG, the National Forensic Footwear Lead will consider the appropriate response. This may initially comprise communicating with the forensic unit either directly or via the regional representative to discuss the issue and agree a resolution. Issues may be escalated to the NFFSB if deemed appropriate and, ultimately, where a significant issue is reported, the SAI responsible for the forensic unit must be informed and consideration should be given as to whether the issue should be reported directly to the FSR.

5.4 Forensic Science Regulator

The Regulator will monitor through the NFOG where this framework is used in lieu of accreditation, considering governance in particular. Where the Regulator considers governance to be insufficient or ineffective, he may consider taking action under Section 5 and Section 6 of the Forensic Science Regulator Act 2021.

² Forensic units which sit in organisations other than police forces and which are adhering to this framework may still opt to report any relevant issues to these groups. Alternatively, they shall manage non-conformances following internal processes detailed in the QMS.

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Section 6. Supporting Documents

Forensic Science Regulator Act 2021

Forensic Science Regulator Code of Practice

BS EN ISO/IEC 17025:2017 General Requirements for the Competence of Testing and Calibration Laboratories

BS EN ISO/IEC 17020:2012 Conformity Assessment – Requirements for the Operation of Various Types of Bodies Performing Inspection

College of Policing Footwear Examination Programme

Police and Criminal Evidence Act 1984 (PACE)

Criminal Procedure and Investigations Act 1996 (CPIA)

Protection of Freedoms Act 2012 (PoFA)

UK General Data Protection Regulation (UKGDPR)

Home Office (2005) Code of Practice on the Management of Police Information

FCN-SP-MGT-GUI-0003 National Guidance for Streamlined Forensic Reporting

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Section 7. Glossary

CJS	Criminal Justice System
CPD	Continuing Professional Development
CPIA	Criminal Procedure and Investigations Act
CSI	Crime Scene Investigator
DSTL	Defence Science and Technology Laboratory
EN	Expert Network
FCN	Forensic Capability Network
FINDS	Forensic Information Databases
FSA	Forensic Science Activity
FSP	Forensic Service Provider
FSR	Forensic Science Regulator
UKGDPR	United Kingdom General Data Protection Regulation
ILC	Inter-Laboratory Comparison
ISO	International Organization for Standardization
MG22A	SFR Forensic Information Report
MoPI	Management of Police Information
NFD	National Footwear Database
NFFSB	National Fingerprint and Footwear Strategy Board
NFOG	National Footwear Operations Group
NFRC	National Footwear Reference Group
NFUG	National Footwear User Group
NPCC	National Police Chiefs' Council
PACE	Police and Criminal Evidence Act
PoFA	Protection of Freedoms Act
PT	Proficiency Test
QMS	Quality Management System
R&D	Research and Development
SAI	Senior Accountable Individual
SFR	Streamlined Forensic Report(ing)
UKAS	United Kingdom Accreditation Service

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Appendix 1: Accreditation Requirements for Footwear Activities

RECOVERY

Footwear mark location, enhancement, recovery at crime scene

Recording of detainees' footwear in custody

CODING & INTELLIGENCE

Coding of crime scene footwear marks

Coding of detainees' footwear prints

Linking of scenes to scenes or detainees based on code only

ASSESSMENT, COMPARISON & EVALUATION

Linking of scenes to detainees based on visual comparison

Screening of crime scene footwear marks against detainees' & suspects' footwear/prints

Enhancement of crime scene footwear marks

Production of test impressions

EVIDENTIAL

The evaluation of the significance of any matching and non-matching features between the footwear scene impression and reference/control footwear marks

KEY

- ISO 17020 accreditation required
- Accreditation not currently required
- NPCC Framework may be used as an alternative to accreditation
- ISO 17025 accreditation required

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Appendix 2: Summary of SFR Footwear Guidance

	TRAINING	FORMS TO USE
<p>1. Basic Coding (National Footwear Database) Outcomes: NFD pattern identification and coding for crime scene marks, custody impressions and footwear. Outcomes:</p> <ul style="list-style-type: none"> • Assignment of NFD code. • Exclusion based on NFD code only. • Recommendation to submit for further comparison 	Level 1 Coding	MG22A (For exclusion and recommendation to submit for further comparison)
<p>2. Visual examination (no test prints) Outcomes:</p> <ul style="list-style-type: none"> • Pattern correspondence • Exclusion based on pattern • Recommendation to submit for further comparison 	Level 1 Coding Peer review not essential	MG22A
<p>3. Initial Comparison Outcomes:</p> <ul style="list-style-type: none"> • exclusion • inclusion (no assessment of value) • authorisation to submit for further examination (relative to other evidence in case) 	Level 2 Screening Peer review not essential	MG22A
<p>4. Detailed Comparison Outcomes:</p> <ul style="list-style-type: none"> • exclusion • inclusion with assessment of value • authorisation to submit for further evidential examination 	Level 3 Expert/evidential	MG22A If no peer review MG22B SFR 1 MG11 Peer review essential
<p>5. Evidential Comparison / Interpretation Outcomes:</p> <ul style="list-style-type: none"> • exclusion • expert interpretation • evaluation • verification (QA) 	Level 3 Expert/evidential	MG22B SFR 1 MG11
<p>6. Addressing of defence issues and disputes.</p>	Level 3 Expert/evidential	MG22C SFR2 MG11

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Appendix 3: Risk Register

Risk Number	Risk title	Details of Risk	Mitigating Actions
1	Incorrect pattern coding of scene mark	Footwear marks recovered from a crime scene are assigned an incorrect pattern code & intelligence disseminated to investigators. Potential for a suspect to be incorrectly suggested, a link to other scenes to be made erroneously or for links to suspects or scenes to be missed.	<ul style="list-style-type: none"> • Framework Requirement for staff undertaking coding activity to be trained; requirement for dip-sampling & ILC/PT/competence testing. • Pattern coding is intelligence-only activity: any suspects identified will result in footwear & marks being submitted for comparison, an activity which requires accreditation. • All forces/FSPs undertaking this activity hold accreditation in at least one discipline & will therefore have a QMS: inclusion in framework of requirement to report/record following internal procedures. • Governance via NFUG, NFOG and NFFSB chaired by NPCC Fingerprint & Footwear lead. • NPCC governance to include requirement for forensic contracts to include requirement for FSPs to follow framework if coding activities not accredited. • NFD and NFRC provide standardised national coding system, including descriptors, variations & links to similar or duplicate patterns.
2	Incorrect linking of scene marks to other scenes and/or suspects	Footwear marks recovered from a crime scene are assigned an incorrect pattern code. Incorrect intelligence disseminated to investigators. Potential for a suspect to be incorrectly suggested or a link to other scenes to be made erroneously.	<ul style="list-style-type: none"> • Framework: Requirement for staff undertaking coding activity to be trained; requirement for dip-sampling & ILC/PT/competence testing. • Pattern coding is intelligence-only activity: any suspects identified will result in footwear & marks being

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			<p>submitted for comparison, an activity which requires accreditation.</p> <ul style="list-style-type: none"> • All forces/FSPs undertaking this activity hold accreditation in at least one discipline & will therefore have a QMS: inclusion in framework of requirement to report/record following internal procedures. • Governance via NFUG, NFOG and NFFSB chaired by NPCC Fingerprint & Footwear lead. • NPCC governance to include requirement for forensic contracts to include requirement for FSPs to follow framework if coding activities not accredited. • NFD and NFRC provide standardised national coding system, including descriptors, variations & links to similar or duplicate patterns.
3	Failure of forces/FSPs to comply with national framework	No requirement for accreditation leads to forces/FSPs to opt not to comply with national framework. Leads to untrained staff undertaking activity without control measures in framework to mitigate risks.	<ul style="list-style-type: none"> • NPCC Fingerprint & Footwear lead communication to all Chief Constables to make aware of requirement to comply with framework. • Inclusion in relevant processes & guidance including SFR guidance that framework must be adhered to. • Requirement to declare compliance with framework. • If included in Statutory Code then UKAS assessment of compliance with Codes may identify failure to adhere to framework and compliance notices may be issued. • All forces/FSPs undertaking this activity hold accreditation in at least one discipline & will therefore have a QMS: inclusion in framework of requirement to report/record following internal procedures.

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			<ul style="list-style-type: none"> • Governance via NFUG, NFOG and NFFSB chaired by NPCC Fingerprint & Footwear lead. • NPCC governance to include requirement for forensic contracts to include requirement for FSPs to follow framework if coding activities not accredited. • Declaration required in SFR & reports.
4	Lack of detail, accountability or consistency in framework	No requirement for accreditation leads to lack of clarity on what the framework requires & lack of understanding around statutory requirement to comply with aspects. Lack of audit & assessment means that force or FSP procedures are not suitable for process or do not mitigate other risks.	<ul style="list-style-type: none"> • Framework produced by EN which includes representatives from Policing, FSPs, College of Policing, SFR Board, Forensic Science Regulator's Office & FINDS. • Framework to be agreed & issued by NFFSB chaired by NPCC Fingerprint & Footwear Lead. • Framework to be subject to regular reviews by EN & NFFSB. • Questions relating to framework to be escalated via NFUG, NFOG & NFFSB. • Governance via NFUG, NFOG and NFFSB chaired by NPCC Fingerprint & Footwear lead
5	Lack of understanding by coding staff of other forensic disciplines	Staff undertaking pattern coding activities unaware or untrained in other aspects of forensic examination leads to lack of continuity, incorrect exhibit handling, contamination of exhibits, incorrect packaging & storage or lack of exhibit integrity which in turns reduces or excludes further forensic opportunities including DNA and fingerprint recovery & comparison.	<ul style="list-style-type: none"> • Framework: Requirement for staff undertaking coding activity to be trained including awareness & understanding of impact of exhibit handling & management on other disciplines. • Pattern coding most often undertaken on exhibits such as gel lifts, ESLAs or images and therefore potential for other evidence types & associated risk of contamination is low. • All forces/FSPs undertaking this activity hold accreditation in at least one discipline & will therefore have

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			<p>a QMS: inclusion in framework of requirement to report/record following internal procedures.</p> <ul style="list-style-type: none"> • Governance via NFUG, NFOG and NFFSB chaired by NPCC Fingerprint & Footwear lead.
6	Requirement for accreditation leads to cessation of coding activities	Forces & FSPs who do not hold accreditation for footwear coding activities consider resource required is not practical and decide to cease this activity. Forces & FSPs who do not currently undertake these activities dissuaded from introducing them. Reluctance from Forces & FSPs who have previously held this accreditation but removed from schedule due to no requirement in non-statutory codes to repeat validation and other associated processes to regain, no longer have resource to resurrect and/or determine resource needed to resurrect is not practical and decide to cease this activity.	<ul style="list-style-type: none"> • Framework instead of accreditation more achievable due to absence of assessment costs and more proportionate mitigation of risk & demonstration of compliance. • National groups provide support & accountability within framework. • Clear guidance within framework & other documentation including training, SFR Guidance and statutory codes plus leadership from NFFSB provides direction & reassurance. • Work from NFFSB/NFOG to produce Footwear Best Practice Manual & information for investigators supports uptake of activities. • Identification of streamlined processes, including technology & updates to NFD & NFRC provides more effective value-for-money solutions
7	Cessation of coding activities leads to loss of intelligence	Forces & FSPs ceasing to undertake coding activities or opting not to adopt these activities leads to limited or no footwear intelligence for investigations in some force areas. Suspects are not suggested and scenes are not linked leading to fewer detections. Reduction in footwear mark recovery by CSIs as no perceived benefit leads to lost forensic opportunities. Footwear comparisons with no prior intelligence leads to unnecessary submissions to FSPs	<ul style="list-style-type: none"> • Framework instead of accreditation more achievable due to absence of assessment costs and more proportionate mitigation of risk & demonstration of compliance. • National groups provide support & accountability within framework. • Clear guidance within framework & other documentation including training, SFR Guidance and

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		<p>or accredited units in forces and/or viable submissions being overlooked or discounted. Unskilled and untrained non-forensic officers attempt to make links between scenes and/or potential suspects. Reduction in these activities includes reduction or cessation of footwear intelligence from prisoners - impacts on content & currency of NFD & NFRC and affects data around pattern frequency. Prohibitive costs and/or lack of capacity in the marketplace or other accredited force footwear units result in decision to cease activity rather than outsource.</p>	<p>statutory codes plus leadership from NFFSB provides direction & reassurance.</p> <ul style="list-style-type: none"> • Work from NFFSB/NFOG to produce Footwear Best Practice Manual & information for investigators supports uptake of activities. • Identification of streamlined processes, including technology & updates to NFD & NFRC provides more effective value-for-money solutions
8	<p>Cessation of coding activities leads to reduced evidential comparisons</p>	<p>Forces & FSPs ceasing to undertake coding activities or opting not to adopt these activities leads to limited or no footwear intelligence for investigations in some force areas & therefor limited or no footwear evidence. Suspects are not suggested and scenes are not linked leading to fewer detections. Reduction in footwear mark recovery by CSIs as no perceived benefit leads to lost forensic opportunities. Footwear comparisons with no prior intelligence leads to unnecessary submissions to FSPs or accredited units in forces and/or viable submissions being overlooked or discounted. Reduction in these activities includes reduction or cessation of footwear intelligence from prisoners - impacts on content & currency of NFD & NFRC and affects data around pattern frequency. Deskilling in relation to footwear activities which then impacts on investigation of major & serious crimes when such activities may be crucial. Lower demand in FSPs & accredited units in force for footwear comparisons may lead to reduction or</p>	<ul style="list-style-type: none"> • Framework instead of accreditation more achievable due to absence of assessment costs and more proportionate mitigation of risk & demonstration of compliance. • National groups provide support & accountability within framework. • Clear guidance within framework & other documentation including training, SFR Guidance and statutory codes plus leadership from NFFSB provides direction & reassurance. • Work from NFFSB/NFOG to produce Footwear Best Practice Manual & information for investigators supports uptake of activities. • Identification of streamlined processes, including technology & updates to NFD & NFRC provides more effective value-for-money solutions. • Engagement with NPCC decision-makers, FSPs & investigators through NFFSB & NPCC Fingerprint &

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		cessation of this activity or footwear examination becoming a niche activity. Prohibitive costs and/or lack of capacity in the marketplace or other accredited force footwear units result in decision to cease activity rather than outsource.	Footwear lead to ensure compliance with framework & continued uptake & investment in footwear discipline.
9	Lack of capacity in the marketplace to undertake coding activities	Forces or FSPs decide not to apply for accreditation but instead to outsource/sub-contract to accredited footwear units in other forces or FSPs leads to increased demand on accredited footwear units for coding activity. Current lack of accreditation in forces & FSPs for this activity or accreditation covered under other activities but may not include required detail. Inability of forces and FSPs to achieve additional accreditation in timescale required by statutory codes. Lack of capacity leads to backlogs, failure to deliver intelligence in a timely manner & missed forensic opportunities. Increased demand, requirement for accreditation & lack of capacity leads to increased costs which in turn may lead to cessation of these activities. FSPs and accredited footwear units in forces may invest in additional resources but costs may limit demand leading to wasted investment. Demand for coding impacts on capacity to undertake footwear comparisons. FSPs may need to apply for access to NFD and NFRC to ensure consistency.	<ul style="list-style-type: none"> • Framework instead of accreditation more achievable due to absence of assessment costs and more proportionate mitigation of risk & demonstration of compliance - facilitates forces & FSP continuing this work at lower cost & impact. • National groups provide support & accountability within framework. • Clear guidance within framework & other documentation including training, SFR Guidance and statutory codes plus leadership from NFFSB provides direction & reassurance. • Work from NFFSB/NFOG to produce Footwear Best Practice Manual & information for investigators supports uptake of activities. • Identification of streamlined processes, including technology & updates to NFD & NFRC provides more effective value-for-money solutions. • Engagement with NPCC decision-makers, FSPs & investigators through NFFSB & NPCC Fingerprint & Footwear lead to ensure compliance with framework & continued uptake & investment in footwear discipline.
10	Lack of capacity and availability	Currently limited capacity within UKAS for assessment of footwear activities: increased scope will lead to insufficient	<ul style="list-style-type: none"> • Framework instead of accreditation more achievable due to absence of assessment costs and more

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	of UKAS assessors to grant accreditation for footwear coding activities	capacity. Lack of capacity from UKAS leads to delays in assessment of forces and FSPs. Lack of accreditation requires forces and FSPs to declare status and may lead to challenges at court with potential loss of cases. Lack of capacity in UKAS results in increased demand on accredited footwear units for coding activity, leading to lack of capacity and backlogs. Forces opting to rely on other accredited force footwear units to deliver service or looking to collaborate may require additional assessment & therefore increased demand for already accredited units. UKAS already experiencing delays & seeking Technical Assessors in forces & FSPs but limited capacity in these organisations to release staff.	<p>proportionate mitigation of risk & demonstration of compliance - facilitates forces & FSP continuing this work at lower cost & impact.</p> <ul style="list-style-type: none"> • National groups provide support & accountability within framework. • Clear guidance within framework & other documentation including training, SFR Guidance and statutory codes plus leadership from NFFSB provides direction & reassurance.
11	Footwear coding undertaken outside the force leads to delays or poor dissemination of intelligence and information	Footwear intelligence activities currently performed within the force and fed into overall force intelligence process, ensuring timely and targeted dissemination of information and intelligence. Outsourcing of work to another force with an accredited footwear unit or FSP will lead to an increased time for intelligence and information to be produced due to exhibit transfer and return of results. Lack of access to force case management or intelligence systems will impact on ease of dissemination and may lead to requirement to "double-key" results.	<ul style="list-style-type: none"> • Framework instead of accreditation more achievable due to absence of assessment costs and more proportionate mitigation of risk & demonstration of compliance - facilitates forces continuing this work in-house. • National groups provide support & accountability within framework. • Clear guidance within framework & other documentation including training, SFR Guidance and statutory codes plus leadership from NFFSB provides direction & reassurance.

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