



CIGIREACHT AN GHARDA SÍOCHÁNA  
GARDA SÍOCHÁNA INSPECTORATE

# Post Implementation Review

Crime Investigation Report 2014  
Recommendation 8.17

Recording details of children under 12 on  
PULSE intelligence records

December 2024

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## Introduction

A Post Implementation Review (PIR) is conducted to verify if a recommendation made in an Inspectorate report has been fully implemented, and if so, whether it is achieving the intended outcome(s). Following an internal assessment process, Recommendation 8.17 in the Inspectorate's 2014 *Crime Investigation* report was selected for review.

## Background

Generally, a person is assigned a unique PULSE Identification Number (PULSE ID) following their first formal interaction with the Garda Síochána. When an incident occurs that requires further action by the Garda Síochána, a PULSE incident record is created. This may relate to a crime, a civil matter or an incident such as a missing person. For any person recorded in an incident as a victim, offender or witness, the PULSE incident record will be associated with that person's unique PULSE ID.

A PULSE ID may also be generated through the creation of an intelligence record on a person's activities. Intelligence records are usually created for persons linked to criminal or suspicious behaviour. As such, it would be unusual for a police service to create intelligence records for children under the age of criminal responsibility.<sup>1</sup> Prolific criminal offenders may well have several hundred PULSE incidents and intelligence records associated with their PULSE ID.

During the 2014 *Crime Investigation* inspection, concerns about the inappropriate recording of children's details on PULSE intelligence records were raised by a number of people who met with the inspection team. At that time, the Inspectorate was informed that thousands of children under 12 including infants under the age of one had a PULSE ID and associated intelligence records. In response, the inspection team requested information to confirm the number of intelligence records created for children under 12 and their ethnicity. At the time of finalising the 2014 inspection report, the Garda Síochána stated that enquiries were still ongoing, a large amount of work remained and they were not yet in a position to give any definitive figures.

To address the concerns identified during the inspection, the following recommendation was made:

*The Inspectorate recommends that the Garda Síochána conducts an urgent review of the recording of children's details as an intelligence record on PULSE.<sup>2</sup>*

1 In Ireland, the age of criminal responsibility is 12. This means that children under 12 cannot be charged with an offence. There is an exception whereby children aged 10 and 11 can be charged with murder, manslaughter, rape or aggravated sexual assault.

2 Garda Inspectorate, 2014. *Crime Investigation, Recommendation 8.17*. Available at: <https://www.gsinsp.ie/wp-content/uploads/2019/07/Crime-Investigation-Full-Report.pdf> [Accessed September 2024].

## Garda Síochána Response to the Recommendation

Following a number of updates, the Garda Síochána informed the Inspectorate in 2021 that the recommendation had been implemented. Actions taken to address the recommendation included:

- > An internal review;
- > An update to the PULSE system that introduced a requirement to seek approval to create an intelligence record for a child under 12; and
- > The roll out of an e-learning training programme for the garda workforce on the creation of intelligence records for that age group.

## Methodology

An information request was submitted to access the findings from the internal review conducted by the Garda Síochána in addition to any policies and procedures in connection with the recording of intelligence on children under 12. The Inspectorate also requested anonymised PULSE data for all intelligence records created from 1 January 2015 to 31 March 2023 associated with a person under 12 (at the time the intelligence was recorded). This period was selected to allow an assessment of the records created in the years following the 2014 recommendation. The review team also requested access to the PULSE system and information on completion rates for the e-learning training programme. Following the request for access to the PULSE system, a formal written agreement document was co-signed with the Garda Síochána in order to establish measures to protect the security of the personal data concerned.

All of the material received was examined in order to assess the impact of the action taken by the Garda Síochána and additional activity was conducted by the review team. This included:

- > A review of information relating to analysis conducted by the Garda Síochána in 2014 that was not available to the Inspectorate at that time;
- > A desk top review of relevant policy and procedure documents;
- > Completion of the e-learning training course by the Inspectorate's review team and assessment of completion rates by garda personnel;
- > Analysis of anonymised PULSE data;
- > Examination of a sample of PULSE intelligence records; and
- > Divisional visits including meeting with a detective superintendent and a criminal intelligence officer (CIO).<sup>3</sup>

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<sup>3</sup> Criminal intelligence officers are specialist garda members who review intelligence records entered onto PULSE and quality assure them. They also create and publish intelligence bulletins (internal information circulated about crimes or CCTV images of suspects).

## Findings and Assessment

This section contains the key findings and assessment and, where the review team considered that additional action is still necessary, the corrective action required is included. This informs the recommendations made at the end of this report.

### Garda Internal Review (pre-publication of the 2014 *Crime Investigation* report)

Following a supplementary request for information, the Inspectorate received a significant volume of material dating back to April 2014, and pre-dating the publication of the *Crime Investigation* report in November 2014. This material related to an inquiry raised by a senior Department of Justice official with regards to the recording of children's details on PULSE and allegations from Traveller organisations about racial profiling. This material shows that considerable action had already been taken by the Garda Síochána prior to the publication of the Inspectorate's report. For example, an internal assessment was conducted, supported by two pieces of analysis by the Garda Síochána Analysis Service (GSAS). It is disappointing that this information and specifically the data contained in the two GSAS reports was not provided to the Inspectorate in 2014, prior to the publication of the *Crime Investigation* report.

The first piece of analysis conducted by GSAS examined intelligence records created for persons under one year of age in an 18-month period from January 2013 to June 2014.<sup>4</sup> This analysis found a total of 58 intelligence records. Records were categorised into a number of different types with intelligence (22%) and child welfare (19%) presenting as the most frequently used categories. GSAS identified that eight records appeared to relate to foreign nationals and four for persons from the Traveller community. On examination of a redacted version of the 58 intelligence records analysed, the Inspectorate review team found that unnecessary and inappropriate intelligence records were created. These included records created for infants as young as 42 days old. Some records contained details about suspected criminal behaviour, probably in relation to an adult, but recorded on the infant's intelligence record. For example, one record referred to a family and included an infant aged 314 days with the comment – '*involved in crime*'.

The second piece of analysis conducted by GSAS examined the period from 1 January 2009 to 30 September 2014 for intelligence records created for persons under seven years of age.<sup>5</sup> The following are some of the findings from this analysis:

- > There were 1,353 records created;
- > 30% of the records related to those who were one year of age or younger;
- > All of the records were similarly categorised with:
  - 24% relating to child welfare;

4 Report dated 13 June 2014

5 Report dated 8 October 2014

- 18% for family tree;
  - 16% for intelligence; and
  - 16% for vehicle stop.
- > Nationality was recorded in 51% of the records with:
- 79% recorded as Irish Nationals;
  - 9% as Nigerian; and
  - 7% as Romanian.

The report noted that *'it is impossible to extract how many of them are Traveller or indeed Roma children as they are not recorded as such on PULSE'*.

## **Garda Internal Review (post-publication of the 2014 *Crime Investigation* report)**

Following publication of the *Crime Investigation* report and in response to the recommendation made, an internal review was commenced by the Garda Síochána in 2015. Of particular note was an examination of intelligence records linked to children under 12.<sup>6</sup> This review found that from the inception of PULSE in 1999 until March 2015, a total of 7,408 intelligence records linked to children under 12 were created.<sup>7</sup> While the review acknowledged that the highest number was created in 2014 (1,836), no specific reasons were identified for this.

Following this internal review, garda divisions were asked to examine intelligence records relating to children under 12 that had been created by their staff and to decide whether each one should be retained, removed or corrected. Following action taken by divisions, it was determined that 3,668 intelligence records were non-compliant with data protection legislation and that 645 PULSE IDs were created solely as the result of an intelligence record. Action was taken at that time to remove the link from all 3,668 intelligence records to the PULSE ID for the child under 12 and to delete all of the 645 PULSE IDs generated through the creation of an intelligence record.

Of the 3,740 records deemed compliant and retained on PULSE, 60% had an incorrect date of birth, with some records relating to people over 12 and in many cases to adults. As an example, a 33-year-old well known to the Garda Síochána had 260 intelligence records linked to their PULSE ID. As one of the intelligence records had incorrectly recorded the person's age as being under 12, each of the 260 intelligence records were subsequently identified in a PULSE search for records linked to a child under 12.

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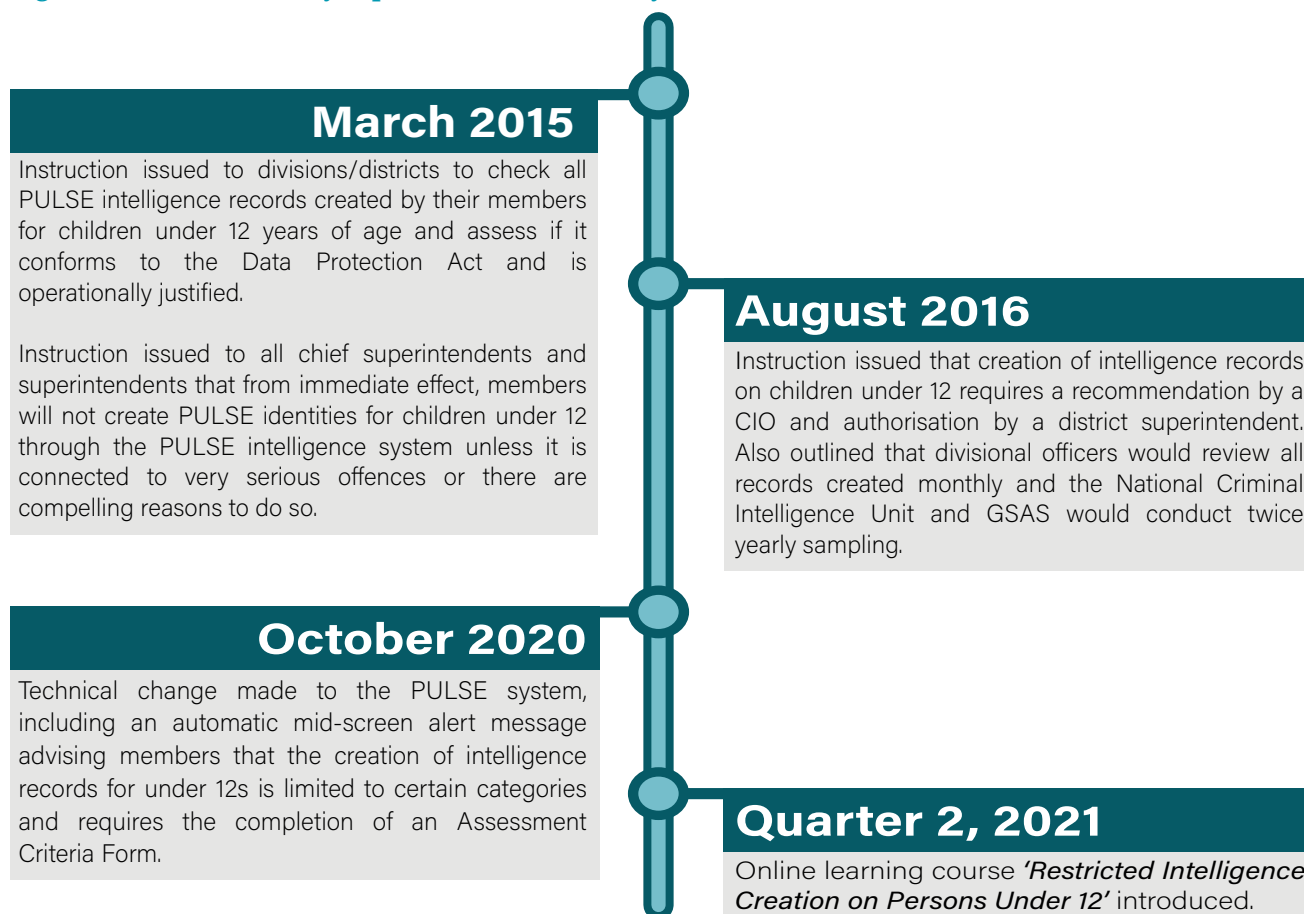
6 Report dated 12 April 2016

7 In 2023, following a review of the data by a GSAS analyst (report dated 14 November 2023), it was discovered that there were a number of duplicate reports contained in the original analysis. As a result, the total number of records created was revised to a total of 7,356.

## Policies and Practices

Following the recommendation in 2014, the Garda Síochána issued a number of instructions and guidance documents in relation to the creation of intelligence records on PULSE for children under 12. These were accompanied by changes to the PULSE system and an e-learning training course. Figure 1 shows a timeline and synopsis of the action taken by the Garda Síochána in response to the recommendation.

**Figure 1: Timeline and Synopsis of Action taken by the Garda Síochána**



Source: Garda Síochána, analysis by the Garda Inspectorate

The reference in Figure 1 to very serious offences includes murder, manslaughter or rape and compelling reasons includes evidence of serious criminal behaviour, child protection issues and links or associations that may increase the risk of harm to a child. While the instruction issued in 2016 stipulated that the National Criminal Intelligence Unit and GSAS would conduct twice-yearly sampling of intelligence reports, this has not taken place.

Although the issuing of instructions in 2015 led to an immediate reduction in the number of records created, the impact was not sustained. However, a technical change made to the PULSE system in 2020 had an immediate and lasting impact. This introduced a requirement on PULSE for a garda member to complete an Assessment Criteria Form, seek a recommendation from a CIO and an authorisation from a superintendent.<sup>8</sup>

<sup>8</sup> An Assessment Criteria Form was originally developed in paper format and it required a garda member to complete the form explaining why they wanted to create an intelligence record on a child under 12. This form was submitted for approval. In 2020, the paper form was replaced by an electronic version on PULSE.

Since the publication of the *Crime Investigation* report in 2014, the Garda Síochána has developed a Human Rights Screening Tool. Although not available at that time, it could subsequently be used to conduct a human rights and equality impact assessment on creating intelligence records for children under 12. This type of assessment would cover the human rights obligations of the Garda Síochána with regards to the legality, proportionality and necessity of gathering and recording of such intelligence. It would also identify the risks associated with this type of intelligence gathering, suggest ways of minimising the impact of garda action on a particular community, and in this case to prevent any disproportionate impact or adverse consequences.

## Garda Training

An e-learning course '*Restricted Intelligence Creation on Persons Under 12*' was delivered through the garda Learning Management System. The course was aimed at all garda members up to superintendent rank, all reserves and garda staff grades up to higher executive officer. Depending on a person's role, staff were expected to complete one of three modules. As of March 2023, the completion rate was 91% with approximately 1,200 personnel still to do so. The pass mark for the knowledge check was 50%, with 21 members not achieving that standard. The review team completed the three modules which were short in duration. The training focused mainly on the process of how to create an intelligence record, rather than the circumstances in which it is appropriate and necessary to do so.

## Corrective Action Required

While the majority of garda personnel have completed the training modules, there are still some garda personnel that need to do so.

## Role of Divisional Superintendents and Criminal Intelligence Officers

To explore the management of intelligence records at the operational level, the review team visited a division in the Dublin Metropolitan Region and met with a detective superintendent and a CIO.

Both reported that it is now rare for intelligence records to be created for a child under 12. They explained that when a serious crime occurs, CIOs may be asked by an investigator to create an intelligence record containing the make-up of a family (family tree). Both garda representatives felt that it was unnecessary to always record the full personal details (name and date of birth) of a young child in these circumstances and that the age and gender of the child would be sufficient.

The CIO also explained that they have authority to invalidate a PULSE intelligence record that is unnecessarily created. In these circumstances, all details contained in the record are deleted and while the actual intelligence record remains, no data is available to anyone accessing it.



## PULSE System - Examination of Intelligence Records

The Inspectorate's examination of PULSE intelligence records created for children under 12 was conducted in two parts:

- > Part 1 involved an analysis of anonymised PULSE data provided to the Inspectorate by the Garda Síochána; and
- > Part 2 involved an examination of a sample of PULSE records by the Inspectorate review team at Garda Headquarters.

### Part 1 - Examination of Anonymised PULSE Data

At the request of the Inspectorate, the Garda Síochána provided anonymised PULSE data for the creation of all intelligence records for children under 12 during the period 1 January 2015 to 31 March 2023. This data provided a certain level of detail, such as the approximate age of the child, the type of intelligence and the unit and station of the member who created the record. The data provided did not contain any personal information, the nature of the intelligence gathered or the reason for recording it.

While intelligence records are usually created in connection with the criminal activity of a person and their association with criminal networks, they can also be created for people who are not involved in crime, such as in child welfare cases.

Analysis found a number of inconsistencies and errors in the data provided. These included errors in the recording of dates of birth, such as intelligence records with a person's age recorded as less than zero years. This was consistent with the findings in the GSAS reports referenced earlier in this review.

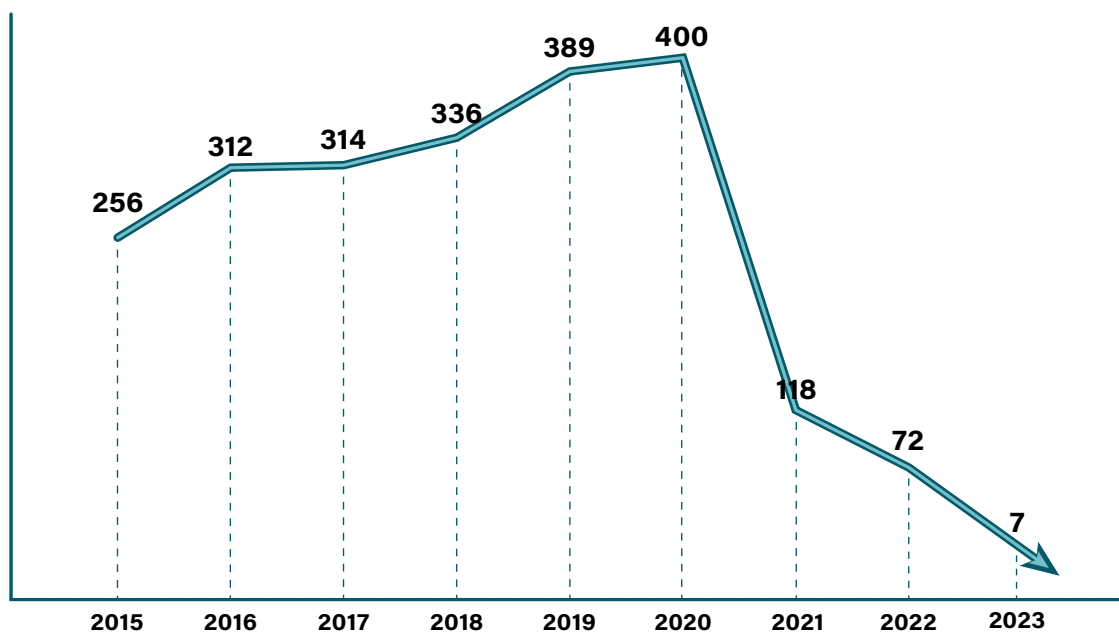
The examination of PULSE data focused on the following three areas:

- > Number of intelligence records created each year;
- > Age groups of children under 12 with intelligence records; and
- > Types of intelligence records created.

### Number of Records Created Each Year

Figure 2 shows the number of intelligence records created each year between 2015 and 2023. The number decreased dramatically from a peak of 1,836 in 2014 and coincided with guidance documents issued by the Garda Síochána. It also shows that the number of records started to rise gradually from 2016 through to 2020. Since 2021, the number created each year has reduced significantly. This reduction occurred following the technical update to the PULSE system and the introduction of e-learning training.

Figure 2: Number of Intelligence Records Created for Children Under 12, by Year– 1 January 2015 to 31 March 2023

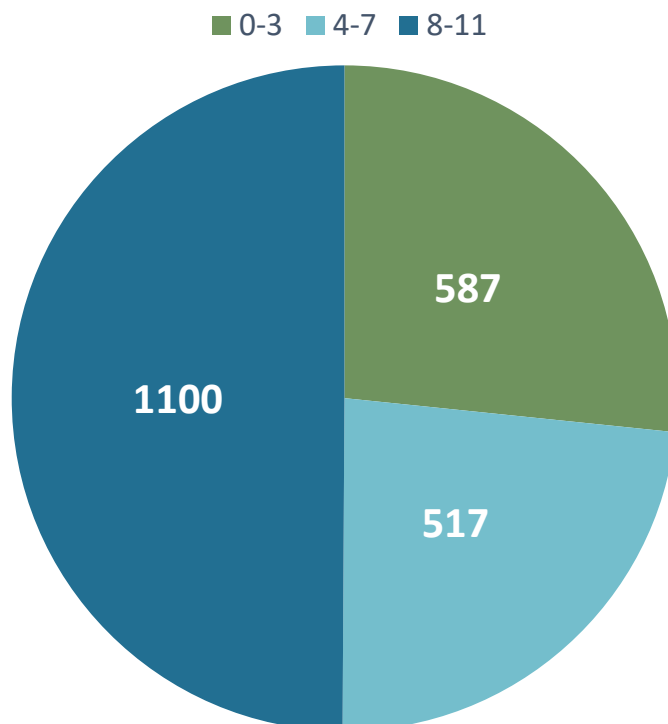


Source: Garda Síochána, analysis by the Garda Inspectorate

### Age Groups of Children with an Intelligence Record

Figure 3 shows the number of intelligence records created for children under 12 between 1 January 2015 and 3 March 2023, broken down by different age groups. This shows that significant numbers of intelligence records were created for very young children, particularly those aged three or under. As highlighted previously, PULSE IDs for children under 12 were often generated through the creation of an intelligence record.

Figure 3: Number of Number of Intelligence Records Created for Children Under 12 Between 1 January 2015 and 31 March 2023, by Age Group.



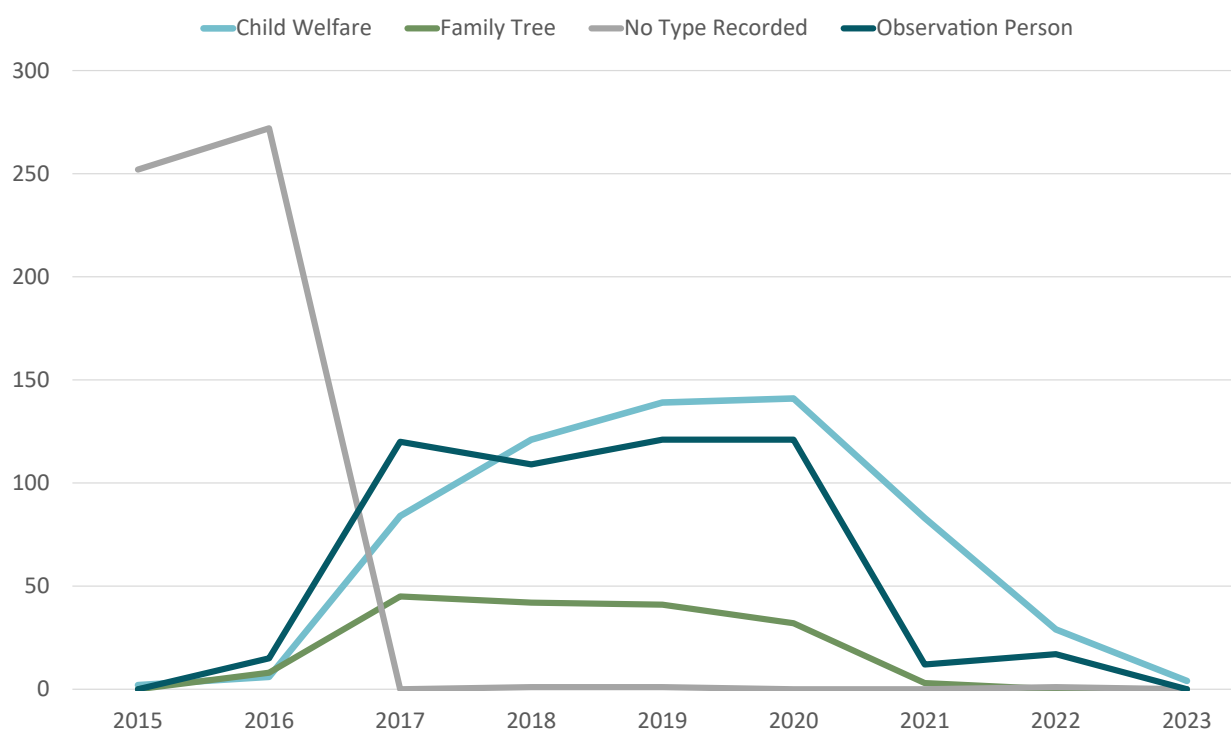
Source: Garda Síochána, analysis by the Garda Inspectorate

## Types of Intelligence Records Created

When an intelligence record is created, a garda member should select the type of intelligence that they have gathered. For example, this might be about a person observed driving a particular car or entering a particular place. Child welfare is also an intelligence type which could be used in circumstances where a child is in a household where drugs are used and the child is considered at risk of harm. For serious crimes, the details of all family members connected to an incident can be recorded in the intelligence type of family tree.

This review found that the three most prevalent intelligence types used were child welfare, observations on a person and family tree. There were also a large number of intelligence records where no intelligence type was recorded. Figure 4 shows the intelligence types most prevalently used and the change in recording practices since 2015.

**Figure 4: Frequency of Use of Intelligence Types by Year for Records Created, by Year - 1 January 2015 to 31 March 2023**



Source: Garda Síochána, analysis by the Garda Inspectorate

In comparing data on records created from 2015 to 2020 and records created after that period, there was a noticeable difference in the use of intelligence types. Figure 4 shows that the practice of not recording an intelligence type ceased in 2017 and since 2021, there have been significant reductions in the use of child welfare, family tree and observations on a person as intelligence types. The Garda Síochána explained that the number of child welfare intelligence records have decreased following changes to the notification process with Tusla, the child and family agency. It was also explained that there is no obligation on a garda member to create an intelligence record for child welfare and there is guidance on how to report child welfare concerns to Tusla. Garda representatives explained that intelligence records created for child welfare incidents are available 24/7 to all garda members to view the details, while

PULSE incidents created in child welfare cases have restricted access. However, this review has identified inconsistencies in the creation of intelligence records for child welfare and guidance needs to be provided to garda members on when it is appropriate to use this as an intelligence type.

### **Corrective Action Required**

The PULSE data supplied to the Inspectorate contained multiple errors and the actual numbers of intelligence records created for children under 12 is far lower than the data suggests. Recommendations are made in this review to address this.

## **Part 2 Examination of PULSE Intelligence Records**

In order to effectively assess intelligence records created for children under 12, the review team requested access to the PULSE intelligence system. This was necessary to view the narrative section on PULSE which is used to explain what the intelligence is and why a record was created. This level of access allowed the Inspectorate to examine a sample of intelligence records to assess the appropriateness of the record and to review the rationale for its creation.

To conduct the examination, the review team attended Garda Headquarters. For analysis purposes, the review team pre-selected a number of the PULSE intelligence records provided to the Inspectorate. This examination focused on records created for children who were five years or younger across the following criteria:

- > Various intelligence types;
- > A range of garda stations; and
- > A variety of different roles performed by members creating the records.

In total, the review team examined 104 intelligence records. While the majority were created in connection with serious crimes or for child protection matters and were correctly recorded, four records were, in the opinion of the Inspectorate, inappropriately recorded intelligence. These included a mother and a one-year-old child sitting in a car waiting for their laundry and a mother, father and a two-year-old child who were seen walking. These intelligence records also led to the creation of PULSE IDs for the children present. These records did not comply with the instruction issued in 2015, which provided that a PULSE ID should not be created through the intelligence system unless certain circumstances existed. As such, these intelligence records and any PULSE IDs associated with them should be deleted. It is worth noting that these records were created before the changes were made to the PULSE system in October 2020.

Garda representatives who provided access to PULSE explained to the review team that in some cases, an exact date of birth may not have been known and a record could include an approximate date of birth provided by a garda member. As a result, there are a lot of people with more than one PULSE ID with variations of their names and dates of birth. This is an anomaly and these are referred to as duplicate records. There are many reasons for this, including mistakes made by garda members when recording a person's data, or by a person

providing a false identity to a garda member or slightly adjusting the name or date of birth they provided. This results in the creation of an additional PULSE ID for a person who already has a PULSE ID associated with them. This can cause difficulty for garda members conducting criminal investigations or trying to identify a person they come into contact with.

The examination also found a considerable number of intelligence records that were not connected to children under 12. In some cases, the member creating the record had entered an incorrect date of birth and in other cases, the intelligence record was attributed to the wrong PULSE ID. Every time a further PULSE intelligence record was created for that person (and even though the correct date of birth was recorded on future occasions), PULSE associated the intelligence record with a child under 12, even though the person was older and in many cases an adult. It was also the case that errors were caused by the automatic creation of an incorrect date of birth for a Fixed Charge Penalty Notice for the registered owner of a vehicle that had committed a speeding offence. This examination found three records showing the driver as an infant. While this is a system error, it is unclear why this type of information needs to be recorded on an intelligence record. In some cases, dates of birth post-dated the date that the intelligence record was created. In essence, records exist with a minus date of birth. These appeared to by-pass the process introduced by the technical change to PULSE that requires an intelligence record for a child under 12 to be recommended by a CIO and approved by a superintendent.

In total, 57% of the records examined appeared to have an error in the date of birth and for records created after October 2020, the error rate rose to 89%. For records created after 2020, many were connected to six individuals and this adversely affected the error rate. In these cases, the intelligence records were attributed to a child under 12 when the subject was in fact older. The error rate in the sample of intelligence records examined by the Inspectorate suggests that there has been a greater reduction in the total number of intelligence records relating to children under 12 than the data suggests.

Creating a PULSE ID for a child under 12 can also arise from an incident that has taken place, such as a road traffic collision that is unconnected to an intelligence record. At present, the creation of a PULSE ID arising in these sort of circumstances does not appear to be subject to any national or local monitoring or approval process.

Although it was not part of this examination, the Inspectorate confirmed that it is possible that the personal data of a child under 12 could be recorded in the narrative section of an intelligence record created for another person, such as a parent or guardian. While a separate intelligence record might not have been created for the child under 12, the child's personal data could be recorded on PULSE.

### **Corrective Action Required**

It was positive to see that following the 2014 recommendation, the Garda Síochána developed a technical solution to remove 3,668 intelligence records that were linked to a PULSE ID as well as deleting 645 PULSE IDs completely. This review also acknowledges the significant reduction in the number of records created since October 2020 and records audited after that time showed that there was a rationale for creating them. However, the PULSE examination

found some intelligence records created prior to October 2020 that should be deleted and any PULSE ID directly resulting from these records should also be removed. To check if the personal data of a child under 12 is recorded in the narrative section of an intelligence record for a child over 12 or an adult, audits could be conducted by using key words to search intelligence record narratives.

To address the issues found during this review, a number of actions are required. These include an audit of all intelligence records created for children under 12 since 2015 to identify any intelligence records created outside of the instructions issued and the deletion of all intelligence records not associated with very serious offences or where there are no other compelling reasons for retention. The audit should also identify records where an incorrect date of birth is recorded and ensure that they are corrected. There appears to be some confusion about the use of child welfare as an intelligence type. The audit should include the use of child welfare as an intelligence type and guidance should be issued on the creation of intelligence records in child welfare cases.

The quality of garda data is adversely impacted by garda members incorrectly recording a date of birth. This may result in the creation of a duplicate record. Duplicate records continue to be a problem for the Garda Síochána and a process should be conducted to merge PULSE IDs that relate to the same person. While this was the subject of a recommendation in the 2014 report, further action is required to prevent the creation of duplicate records and to merge multiple PULSE IDs that relate to the same person.<sup>9</sup> A garda representative who met with the review team highlighted some concerns with merging duplicate PULSE IDs and said that great care needs to be taken to ensure that they belong to the same individual.

With regards to creating PULSE IDs for children under 12 through an intelligence record, the review team found limited evidence of oversight by Garda Headquarters or local monitoring of this type of activity. For such a sensitive area, data needs to be accurate and it needs to be subject to strong oversight and monitoring at both national and local levels. To address, this a number of recommendations are made.

## Overall Assessment of Progress

Although the Garda Síochána took immediate action to address this 2014 recommendation, it was not fully implemented until 2021. It is clear that the significant reduction in the number of records created coincided with instructions issued in 2015. However, the impact was short lived and it took updates to the PULSE system and training to achieve significant change in practices. In particular, changes to the PULSE system and the requirement to complete an approval process appear to be the main contributory factors in the reduction in the number of records created.

The creation of a PULSE ID for a child under 12 arising from the creation of an intelligence record or an incident that is recorded on PULSE is a significant action to take. While there is an approval process for creating intelligence records and PULSE IDs for children under 12,

<sup>9</sup> *Crime Investigation (2014), Recommendation 8.19.*

there is no similar approval process or monitoring of a PULSE ID created for children under 12 through a PULSE incident. Creating a PULSE ID for children under 12 in any circumstances should be monitored at both national and local levels.

Although a recommendation to address the issue of duplicate PULSE intelligence records was made in the 2014 *Crime Investigation* report, it is still an issue that requires attention.

It is clear that prior to October 2020, some records were created for children under 12 without good reason and in many cases this led to the creation of PULSE IDs for those children. The Garda Síochána has an obligation under Section 42 of the Irish Human Rights and Equality Commission Act 2014 to eliminate discrimination, promote equality and protect the human rights of staff and people availing of their services.

There is organisational learning from this review as it shows that instructions and guidance need to be constantly monitored to ensure continued compliance and that additional actions such as training and technology fixes are often critical to achieving sustained change in practices.

While nationality is sometimes recorded on PULSE intelligence records, a child's ethnic origin is not. The absence of this type of data prevents deeper analysis to understand if any particular communities or groups are disproportionately affected by garda activity. Each garda policy should contain an impact assessment that outlines the human rights and equality risks associated with it and suggest ways of minimising the impact of garda action on a particular community.

While the 2014 recommendation is considered by the Inspectorate to be fully implemented, further action is required.

## Recommendations

In order to improve the processes and practices identified during this Post Implementation Review, the following recommendations are made:

### Recommendation 1

The Inspectorate recommends that the Garda Síochána ensure that all garda personnel complete the e-learning modules.

### Recommendation 2

The Inspectorate recommends that the Garda Síochána complete an audit of all intelligence records for children under 12 that were created from 1 January 2015 to current date. Upon completion of that audit, the following action should be taken:

- > Remove all intelligence records that were not created in connection with very serious offences or where there are no compelling reasons to retain it;
- > Remove all PULSE Identification Numbers where the source for their creation was an intelligence record that should not be retained;
- > Amend all PULSE records for children under 12 where the date of birth or other personal data is incorrect; and
- > Review the use of child welfare as an intelligence type and issue guidance on the creation of intelligence records in child welfare cases.

### Recommendation 3

The Inspectorate recommends that the Garda Síochána develop a technical solution for the PULSE system to address the following areas:

- > Incorrectly attributing/associating a PULSE intelligence record on a child over 12 or an adult to a child under 12; and
- > Generation of incorrect dates of birth for registered vehicle owners in Fixed Charge Penalty Notice cases.



### **Recommendation 4**

The Inspectorate recommends that at a national level, the Garda Síochána conduct sampling of the creation of PULSE Identification Numbers and intelligence records for children under 12. This type of activity should be extended to searching PULSE intelligence record narratives to identify records that contain personal data about a child under 12.

### **Recommendation 5**

The Inspectorate recommends that the Garda Síochána ensure that all PULSE Identification Numbers and intelligence records created for children under 12 are reviewed by divisional officers as part of the Performance Accountability Framework process.

### **Recommendation 6**

The Inspectorate recommends that the Garda Síochána take action to prevent the creation of multiple PULSE Identification Numbers for the same person, reduce errors in recording practices and issue updated guidance and instructions in relation to merging procedures.



CIGIREACHT AN GHARDA SÍOCHÁNA  
GARDA SÍOCHÁNA INSPECTORATE

**Cigireacht an Garda Síochána**

**Ríomhphost:** info@gsinsp.ie  
**Suíomh Gréasáin:** www.gsinsp.ie

Lean muid ar: [www.x.com/gsinsp](http://www.x.com/gsinsp)

**Garda Síochána Inspectorate**

**Email:** info@gsinsp.ie  
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