

ORIGINATOR: CHIEF CONSTABLE

PAPER NO: AP14/70

**SUBMITTED TO: ACCOUNTABILITY AND PERFORMANCE PANEL –
24 OCTOBER 2014**

SUBJECT: HMIC CRIME DATA INTEGRITY REVIEW 2013/14

SUMMARY:

1. This report details the background to the recent HMIC Inspection of Crime and Data Integrity.
2. The recording arrangements were reviewed under three specific headings, namely Leadership and Governance, Systems and Processes and People and Skills. These are outlined in the main body of the report.
3. Section 5 of the report details the HMIC recommendations, and the actions to be taken by the Constabulary immediately, after three months and after six months.

RECOMMENDATION:

1. The Accountability and Performance Panel is asked to support the work undertaken in respect of the HMIC Inspection of Crime and Data Integrity, and note the establishment of the Crime Data Integrity Group.

DETAIL OF THE SUBMISSION

1. INTRODUCTION

1.1 In the 2013/14 inspection programme, Her Majesty's Inspectorate of Constabulary (HMIC) inspected all forces in respect of crime and data integrity. The central question was:

"To what extent can police-recorded crime information be trusted?"

1.2 The inspection involved:

- An examination of a small representative sample of data from force crime and incident recording systems, asking the basic compliance question 'If a crime has occurred has it been recorded?'
- A dip sample of out-of-court disposals (Cautions, Penalty Notices, Cannabis warnings and Community Resolutions).
- A review of no-crime decisions for rape, robbery and violence.
- An assessment of local crime recording arrangements.
- A peer review of the audit findings.

1.3 The recording arrangements were reviewed under three specific headings, namely Leadership and Governance, Systems and Processes and People and Skills. These are outline further below.

1.4 A taskforce, known as the Crime Data Integrity Group, had already been established to:-

- Ensure the public can have confidence in the accuracy of police recorded crime data;
- Ensure that police leaders are effective in their oversight and assurance of crime data held by Suffolk Constabulary;
- Ensure that victims are served well by Suffolk Constabulary when crime recording decisions are made;
- Ensure that out of court disposals are the right ones for victims, offenders and the wider public.

1.5 The Terms of Reference are attached at Appendix A.

2. LEADERSHIP AND GOVERNANCE

2.1 The report acknowledges that Chief Officers support Crime Data Integrity and that action and decisions are clearly victim focused. Policies and procedure are consistent with the National Crime Recording Standards (NCRS).

2.2 The monthly Force NCRS audit is currently directed principally to high risk crime and incident types recorded within the Crime Information System (CIS) and the Force incident recording system (STORM). Results are reported directly to force

performance meetings and circulated widely with actions directed at the managers responsible. This is good practice, however the inclusion of a more varied sample including other in-pur systems and other themes could inform and improve integrity. Quality assurance within the Contact and Control Room (CCR) could equally be reviewed to encompass more varied themes.

3. SYSTEMS AND PROCESSES

- 3.1 The two principal systems reviewed for data accuracy were the STORM incident recording system and the Case Administration Tracking System (CATS) used for recording incidents concerning children and vulnerable persons.
- 3.2 STORM indicated that a small number of incidents had not been recorded as crimes. In general, correct police action had been taken in the circumstances and the needs and wishes of the victim were the prime consideration. However, HMIC reported that there was a basic misunderstanding of the administrative rules requiring the completion of a crime report. There was no evidence to indicate any failure to record being driven by performance pressures.
- 3.3 HMIC acknowledged that the Force has a strong focus towards victims of crime, but felt on occasion that the Force had referred cases for partner agency investigation, and sometimes overlooked the obligation to record the matter as a crime. HMIC reported that this was leading to an approach of 'investigating to record'
- 3.4 HMIC considered that staff used out-of-court disposals responsibly, with a bespoke pro-forma checklist guiding staff to correct disposal decisions. It was identified that in the case of Community Resolutions the agreed outcome was not necessarily always meaningful and appropriate.
- 3.5 In respect of no-crimes, HMIC identified errors where the threshold required for Additional Verifiable Information (AVI) had not been met.
- 3.6 Concern was expressed in relation to rape offences. HMIC reported that they inspected 6 rape investigations and 4 of these had not been recorded as crimes. Investigations have been carried out in relation to all these reports. HMIC did not express any concerns about the level or appropriateness of these, but reported that these should have been recorded as crimes. HMIC found this to be further evidence of 'investigating to record' rather than recording upon first report.

4. PEOPLE AND SKILLS

- 4.1 Staff within specialist investigation departments were found to have appropriate knowledge of NCRS. HMIC reported that operational staff appreciate that the needs of the victim are essential to all crime investigation decisions, but that they would benefit from further awareness training in the aspect of administrative recording of Home Office Counting Rules (HOCR) and National Crime Recording Standards.
- 4.2 Dedicated Decision Makers (DDM's) likewise should be provided with additional guidance to address the rules, specifically in relation to Additional Verifiable Information.
- 4.3 The Force Crime Registrar (FCR) conducts a monthly audit commensurate with the resources available and reports direct to the force lead on a monthly basis. The audit should encompass more varied themes to inform and improve integrity. It is noted, however, that there is little resilience and limited resources within the FCR section.

4.4 The assessment of the recording arrangements form the basis of a number of recommendations that the Constabulary is expected to implement within set periods of time.

4.5 These recommendations are detailed below with the progress to date.

5. HMIC CRIME DATA INTEGRITY REVIEW – RECOMMENDATIONS

5.1 This section sets out the points which require action immediately, within three months and within six months (shown in italics) together with action taken.

Immediately

5.2 *The Force should review where and with whom responsibility for day to day oversight of the application of, and compliance with, Home Office Counting Rules (HOCR) and the National Crime Recording Standards (NCRS) is held; and ensure that this is reflected in relevant policy and guidance and communicated to staff.*

5.3 A Process Chart has been prepared identifying reporting routes into the Constabulary, identifying pinch points where key Crime Recording Decisions (CRD) are made.

5.4 An option paper will be prepared by Detective Superintendent, County Policing Command, for a Crime Data Integrity (CDI) Group meeting addressing appropriate authority levels for CRD, reclassification and no-crime. The completion of this paper will fall within the HMIC timescales.

5.5 *The Force should ensure that reports recorded separately on other force systems (e.g., those used by the public protection teams) are recorded as crimes. Special attention should be directed toward the CATS database and those reports which involve vulnerable adults and children. The Force should put in place proportionate and effective audit arrangements through the FCR to assure itself that reports held on these systems are properly recorded as crimes.*

5.6 The Monthly NCRS audit now includes CATS data sample. The Audit result is submitted directly to Detective Chief Inspector, Protecting Vulnerable People (PVP), for issues within CATS to be resolved.

5.7 A Crime Recording presentation has been given to specialist PVP supervisors, supported by the Assistant Chief Constable, relating to vulnerable persons.

5.8 Crime Recording input has also been prepared for specialist staff within the Multi Agency Safeguarding HUB (MASH) responsible for management of CATS referrals.

5.9 A Guidance booklet is being prepared for all staff listed above, with relevant HOCR examples.

5.10 A Guidance note and flow chart has been circulated to all staff regarding third Party reporting.

5.11 A management process has been introduced within the MASH for immediate referral of identified crimes to the Investigation Management Unit (IMU) for immediate recording.

5.12 A management process is to be introduced for immediate recording of CATS referrals directed to Child Abuse Units.

5.13 The Monthly audit is being extended to include a sample from the E-CINS multi-agency ASB system.

- 5.14 *The Force should address the inaccuracy of its no-criming decisions. It should provide guidance to all officers and staff who are engaged in requesting or making no-crime decisions which clearly describes the standard of additional verifiable information required in order to authorise a no-crime in accordance with the NCRS. Arrangements should be put in place to ensure effective compliance with the standard.*
- 5.15 No-crime advice will be circulated via the Monthly audit summary to all Dedicated Decision makers (DDM's).
- 5.16 DDM guidance notes have been amended to re-emphasise Additional Verifiable Information (AVI) criteria, and re-circulated to all DDM's responsible for no-crimes and those responsible for reclassification, with endorsement by Detective Superintendent, County Policing Command.
- 5.17 One-to-one awareness input is underway and delivered by the FCR to all new DDM posts, supported by refresher training for current post holders.
- 5.18 All DDM's to be provided with examples of HMIC No-crime 'failures'.
- 5.19 *The Force should ensure that its crime recording policy is compliant with HOCR and NCRS. In particular, the Force should ensure its guidance on dealing with reports of rape clearly specifies the point at which, and conditions in which, a report of rape should be recorded as a crime. In addition there should be clear communication to officers and staff:*
- *to inform them of the crime recording policy and the expectation that they adhere to it*
 - *to stop any working practices which may amount to a policy of 'investigate-to-record'; and*
 - *to reinforce the unequivocal message that ethical crime recording and compliance with the NCRS is required irrespective of the effect this might have on force performance.*
- 5.20 A news item has been circulated by the Assistant Chief Constable advising all staff of the above bullet points. Other senior staff will also endorse NCRS and ethical crime recording.
- 5.21 A briefing note has been prepared on HMIC recommendations for delivery to CPC supervisors.
- 5.22 A guidance note and flow chart has been circulated to all staff regarding third Party reporting.
- 5.23 A joint training programme will be developed with Norfolk Constabulary in the form of an online training package. This will contain visual endorsement by a Chief Officer.
- 5.24 The Constabulary will consider the withdrawal and replacement of the current crime recording aide memoir, re-affirming and emphasising the need to eliminate any 'investigate to record' approach.
- 5.25 Identification of the most effective method of distribution of DVD training material will be undertaken.

Within Three Months

- 5.26 *The Force should communicate the availability of the confidential reporting line to staff again, emphasising that it is indeed confidential and can be used for all matters of concern, including those relating to crime data integrity.*

- 5.27 The reporting line was reviewed and is regularly used. No evidence was found of any significant mistrust of the line by officers or staff.
- 5.28 *The Force should introduce a structured and proportionate quality assurance process by supervisors within the force control room. This should be undertaken on a consistent basis across all teams, include a check of compliance with the NCRS and, where appropriate, feed into the development of professional practice and continuous improvement within the force control room.*
- 5.29 The current monthly audits include an element of NCRS compliance. These are reported to a Performance Group on a monthly basis.
- 5.30 A paper will be presented to the Crime Data Integrity Group meeting on the extension of the monthly CCR audit to include additional daily review of incidents on nominated theme – presently five additional incidents per day created under the incident category of Crime Burglary.
- 5.31 *The Force should review its assessment of the risks associated with crime data integrity and the apparent under-recording of crime, taking the necessary steps to improve the accuracy of crime recording. Risks should be included in, and monitored through, the force risk register.*
- 5.32 Work is progressing on this issue, and remains ongoing.
- 5.33 *The Force should review its policy and practice for dealing with reports of making off without payment, ensuring that it is compliant with the HOCR and the NCRS, and that staff responsible for making crime-recording decisions on these offences are aware of the requirements to work within these policy guidelines.*
- 5.34 The Home Office have reviewed the Make-off without Payment policy. There have been some minor grammatical changes to the policy to clarify the issue of 'record to investigate', otherwise this is considered fit for purpose. It has been adopted by the Force and managed within the Investigation Management Unit (IMU) by the Detective Inspector.
- 5.35 *The Force should introduce a structured regular audit plan and ensure the Force Crime Registrar (FCR) has sufficient resources and skills to carry out a proportionate and effective audit programme that balances the cost of the checking process with the need to improve the accuracy of crime recording. This should include the capacity to respond to emerging issues and to re-visit and test the effectiveness of changes made to respond to identified shortcomings.*
- 5.36 With immediate effect the audit programme has been enhanced and now includes additional material from the CATS system, E-CINS sample and inclusion of the STORM category of 'NCRS Exempt crime'.
- 5.37 It is hoped to include non-crimes in the future (possibly at the expense of one of the current monthly audit subjects).
- 5.38 The compliance criteria has been amended to reflect the recent HMIC evaluations and it will be presented in a percentage format to enable direct month-on-month comparison. A paper is to be prepared for submission to the Crime Data Integrity Group meeting.

Within Six Months

- 5.39 *The Force should review the roles, responsibilities and number of designated decision makers in the force so as to secure a consistent application of the NCRS in respect of no-crime decisions, and in so doing ensure the force should make sure designated decision-makers are independent of investigations.*
- 5.40 As per the recommendation at para 5.2, a paper will be prepared by Detective Superintendent, County Policing Command, to a Crime Data Integrity (CDI) Group meeting addressing this issue. The completion of this paper will fall within the HMIC timescales.
- 5.41 *The Force should establish and begin operation of an adequate system of training in crime-recording for all police officers and police staff who are responsible for making crime-recording decisions, and ensure those who require such training receive it as soon as reasonably practicable.*
- 5.42 As per the recommendation at para 5.19 a complete review of operational officer training is scheduled, an online training package is being prepared and it is anticipated all online training will be completed within the six months.
- 5.43 Additional awareness training to re-emphasise NCRS values and HOCR technical rules has, and is, being reviewed for staff with specialist functions and, where appropriate, being updated e.g. Crime Allocators, Contact and Control Room (CCR) supervisors, Case Review Officers, Crime Trainers, Crime Investigation Unit (CIU) supervisors, PVP supervisors and all DDM's.

6 FINANCIAL IMPLICATIONS

- 6.1 The HMIC report makes comment upon the lack of resources and resilience within the Crime Registrar section.
- 6.2 This issue forms part of the Action Plan currently being assessed by the Crime Data Integrity Group.

7 OTHER IMPLICATIONS AND RISKS

- 7.1 The HMIC recommendations, and Constabulary actions to be undertaken immediately, within three months and within six months, are detailed in the main body of the report.

ORIGINATOR CHECKLIST (MUST BE COMPLETED)	PLEASE STATE 'YES' OR 'NO'
Has legal advice been sought on this submission?	NO
Has the PCC's Chief Finance Officer been consulted?	NO
Have equality, diversity and human rights implications been considered including equality analysis, as appropriate?	YES
Have human resource implications been considered?	YES
Is the recommendation consistent with the objectives in the Police and Crime Plan?	YES
Has consultation been undertaken with people or agencies likely to be affected by the recommendation?	YES
Has communications advice been sought on areas of likely media interest and how they might be managed?	YES
Have all relevant ethical factors been taken into consideration in developing this submission?	YES