



**STRATEGIC POLICING AND CRIME BOARD
3 October 2017**

**HMICFRS Crime Data
Integrity Inspection 2017**

PURPOSE OF REPORT

1. This report is to provide an update to the Strategic Policing and Crime Board of the results of the HMICFRS Crime Data Integrity Inspection 2017 and set out actions to be taken to address issues raised in the report.

INTRODUCTION

2. West Midlands Police has recently been inspected by HMICFRS for Crime Data Integrity (CDI), and received the following inspection grading:

Effectiveness of crime recording – *Inadequate*
Efficiency of crime recording – *Requires Improvement*
Leadership – *Good*
Overall Judgement - *Inadequate*

3. West Midlands Police were last inspected for Crime Data Integrity in 2014. Whilst an official grading was not given, our approach was described by then HMIC as best practice. All areas for improvement identified in that inspection have been addressed and progress praised by HMIC. It is clear that inspection methodology and expectations have changed significantly.

HMICFRS REPORT

4. This CDI inspection consisted of five weeks of data collection, three weeks of case file review and one week of reality testing. HMICFRS examined 1,465 incident and crime records and found crime recording accuracy to be at 83.8%. The inspection looked at information between July and December 2016.
5. The inspection looked at three crime categories; Sexual Offences (including Rape), Violence and All Other Crime. It should be noted that HMICFRS was clear that it found **no**

evidence of any deliberate acts of not recording a crime or any performance pressures to influence this. The majority of crimes found not to have been recorded are *victim based*, but it does also include some *state based* crime where there is no victim.

6. The key issues identified in the CDI inspection report and areas for improvement are summarised as follows:

Systems & Processes – attending Officers to record all crime at the earliest opportunity, the effectiveness of arrangements for officers to record crime through the Crimes Services Team (CST) and a quality assurance process within Force Contact.

Recording crime at point of call – where sufficient information exists to determine a crime has been committed.

Supervision of crime recording decisions – increased levels of supervision across all Departments.

Domestic Abuse – the importance of addressing anomalies between the victim's account at first call and attending officers' conclusions with greater emphasis upon understanding why the victim has changed their initial account.

Multiple crimes recorded – where more than one crime is disclosed in an incident record or agency referral these are recorded at the earliest opportunity.

N100 Rape non-crime – improved use and correct crime classification for substantive offences of Rape.

Training – to address the issues mentioned above and additional training for Malicious Communications, Harassment, Common Assault and Third Party reporting.

Victim Data Collection – improve the collection of diversity information and how it is used to inform it's compliance with it Equality Duty.

7. HMICFRS found strong leadership from senior officers in West Midlands Police in regard to crime-recording expectations, and an approach among the majority of officers and staff that places the victim at the forefront of their crime-recording decisions.
8. Progress against the 2014 CDI recommendations was captured within the WMP HMICFRS Recommendations Tracker, reported upon quarterly to the Executive Team and monitored through the Joint Audit Committee.
9. HMICFRS found West Midlands Police has made progress in its crime-recording processes since 2014. In particular good progress has been made with implementing changes recommended in the 2014 report, and as a result the force has satisfactorily completed eight out of ten of these recommendations. Those not completed have been superseded by new recommendations.

WMP RESPONSE TO HMICFRS

10. West Midlands Police accepts the accuracy of data referred to by inspectors, subject to a few minor amendments. The Force appreciates that the findings, when compared with other similarly inspected forces, equate to an overall low grading against new inspection

criteria and it does not dispute this. Much of the report mirrors that identified by the internal audit and compliance team and is already the focus of determined improvement activity.

11. Of the 16.2% of crime, within the sample, found not to have been recorded accurately by officers the reasons for this vary: from a limited of knowledge of Home Office Counting Rules (HOCR); a misunderstanding of the rules (*for example*: Rape recording one crime for the victim of the Rape rather than a crime for each of the suspects involved); recording the main crime but not recording the additional crimes contained within a referral (*for example*: modern slavery or CSE); the recording of a N100 rape non-crime instead of a substantive offence and also the recording of a non-crime record instead of a full crime (*for example*: Domestic Abuse) to not negating the crime properly within the incident record or, quite simply, a poor crime recording decision made by the officer. It should be noted that, whilst the HOCR & NCRS rules may not have been strictly adhered to, these crimes were captured within police systems and many victims were supported and perpetrators prosecuted.

12. WMP has raised some concerns to HMICFRS with regards to two of the recommendations:

Recording crime at point of call – WMP perceive that this Cause for Concern reflects HMICFRS preference for crime recording at the point of first contact. With nearly 900,000 incident records per annum it is not feasible or practical to adopt this approach. To do so would require a change to the current operating model and generate vastly increased work to achieve marginal gains in accuracy, which WMP believe would be better achieved through continual improvement of our current crime recording processes.

Victim Data Collection (Diversity Information) - It is the view of WMP information security experts that such mandatory collection conflicts with data protection guidance and the spirit of the legislation. Victims are not required to provide this information and it does not feature within any national data returns, with the exception of Hate Crime.

13. HMICFRS found that the Force Crime Registrar (FCR), supported by a fully accredited deputy and a small team of staff, carries out very regular crime-recording audits. These follow the national guidance provided by the Home Office and are viewed as good practice.

WMP IMPROVEMENT PLAN

14. WMP has just completed an improvement plan, in response to the CDI recommendations. It has three strands; **Training, Audit** and **Governance**:

Training; mandatory completion of the WMP HOCR NCALT training package for all staff (developed by WMP and signed off by the Home Office as national good practice), including additional modules on N100 Rape non-crime and Common Assault. FCR training to all Chief Inspectors / Dedicated Decision Makers and crime recording module on new recruit and promotion training courses.

HMICFRS was also encouraged that the force is considering how the expertise of the FCR and his team can be used to improve the crime-recording audits being carried out locally by different departments and which are intended to provide a better view of crime-recording standards.

Audit: The Audit & Compliance Team to broaden the audit regime and listen to calls. CST supervisors to monitor the recording of N100 Rape non crime. The four Service

Improvement Teams (Force Contact, Force Response, PPU and Force CID), to complete regular monthly crime recording audits and supervisory checks.

Governance: The CDI improvement plan will be managed through the Strategic Information Management Board (SIMB) chaired by the Deputy Chief Constable. The Service Improvement Team audits will feed into the monthly Quarterly Assurance Report. Audit findings to feature as part of the departmental QPR discussions with the respective Executive Team lead. A select number of Chief Inspectors will become crime recording champions for WMP, supported through the Crime Leaders Forum.

FINANCIAL IMPLICATIONS

15. There is no immediate financial implication for WMP as the CDI improvement plan is based on a *business as usual* methodology, without disruption to the current operating model. It should be noted, however, that increased compliance is dependent upon greater investment in audit time and to address all recommendations raised by HMICFRS would require a change to the WMP operating model and associated investment.

LEGAL IMPLICATIONS

16. HMICFRS is empowered in law to inspect police under the three strands of Efficiency, Effectiveness and Legitimacy (PEEL). Crime Data Integrity (CDI) is a separate inspection strand that came out of the Home Affairs Select Committee review of crime recording (2013) and commissioned by the then Home Secretary Teresa May. Whilst HMIC make recommendations to police forces to secure improvements, these are just recommendations and not enforceable. However, if a police Force fails to make the required improvements then the matter will be subject of a formal escalation process, with final intervention from the Home Secretary.

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