Crime data integrity

Inspection of Suffolk Constabulary

August 2014

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**Introduction**

In its 2013/14 inspection programme\(^1\), Her Majesty’s Inspectorate of Constabulary (HMIC) committed to carry out an inspection into the way the 43 police forces in England and Wales record crime data. All 43 forces will be inspected by mid August 2014, with a full thematic report published in autumn 2014. The central question of this inspection programme is:

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

Accurate crime recording underlines the police service’s commitment to public accountability, ensures that local policing bodies\(^2\) can match resources to the risks identified in communities and enables the police to provide a proper service to victims of crime.

Recent HMIC inspections have revealed weaknesses in police crime recording, particularly the under-recording of crimes. In our interim report of 1 May 2014 we said that “we are seriously concerned at the picture which is emerging”\(^3\).

We strongly recommend our findings in this report are read alongside the interim report, *Crime recording: A matter of fact - An interim report of the inspection of crime data integrity in police forces in England and Wales*, available at www.hmic.gov.uk.

The interim report sets out the full context of this inspection programme including the rules and standards governing crime data integrity: the National Crime Recording Standard (NCRS)\(^4\) and Home Office Counting Rules (HOCR)\(^5\).

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1. The 2013/14 inspection programme was approved by the Home Secretary under section 54 of the Police Act 1996.
2. Police and crime commissioners for police areas outside London: the Mayor’s Office for Policing and Crime for the Metropolitan Police Service; and the City of London Corporation for the City of London Police.
4. NCRS is a standard of crime-recording introduced in 2002 and published as part of the Home Office Counting Rules; it has the twin objectives of ensuring the police focus more on victims of crime and ensuring consistency in crime-recording in all police forces.
5. HOCR are rules in accordance with which crime data – required to be submitted to the Home Secretary under sections 44 and 45 of the Police Act 1996 – must be collected. They set down how the police service in England and Wales must record crime, how crimes must be classified according to crime type and categories, whether and when to record crime, how many crimes to record in respect of a single incident and the regime for the re-classification of crimes as no-crimes.
Methodology

Each force inspection involves:

1. An examination of crime records for the period 1 November 2012 to 31 October 2013;

2. A dip-sample of out-of-court disposals (cautions, Penalty Notices for Disorder (PND), cannabis warnings, community resolutions) and no-crime decisions for rape, robbery and violence;

3. Visits to forces where inspectors assess local crime recording arrangements under three headings: leadership and governance; systems and processes; and people and skills; and

4. A peer review of audit findings by an NCRS expert from outside HMIC.

The audit examined for compliance a small sample of crime records from each force. Taken together, these samples are sufficient to provide a reliable national estimate, but are too small to produce a force estimate of compliance. Force compliance rates typically result in a margin of error of around +/- 10 percent and therefore a range of 20 percent. This range of uncertainty means that few, if any, conclusions can be drawn from individual force compliance rates or comparisons of rates between forces based on the data alone. (Samples large enough to make more reliable force judgements, while desirable, were not affordable.) Our conclusions and recommendations are, therefore, based upon the evidence drawn from our inspection of the force’s crime-recording arrangements.

The scope and structure of the report

This report is divided into the following sections:

1. Part A: A summary of our findings, and recommendations;

2. Part B: Our findings in numbers;

3. Part C: Additional detailed inspection findings.

This report, undertaken at a force level, allows a qualitative assessment of the force’s crime recording arrangements and to make recommendations for improvement.
Part A: Summary of inspection findings and recommendations

Leadership and governance

Chief officers in Suffolk Constabulary promote the importance of crime data integrity through a range of messages that are linked to the force mission and values statements. These clearly outline the intention that actions and decisions should focus on the needs of the victim. The assistant chief constable is the lead officer responsible for matters relating to crime data and its integrity.

The force has an established governance structure that is underpinned by policy and procedural guidance. These are consistent with the HOCR, the NCRS and the National Standard of Incident Recording (NSIR). There is also detailed guidance which deals with specific offence types.

Despite this, we found that staff were unclear as to who was responsible for ensuring day to day compliance with the HOCR and NCRS. This responsibility should ideally be positioned with the force control room where there is oversight of recorded incidents, and at the investigation management unit (IMU) for confirmation/classification for those incidents recorded as a crime. This will enable independence from service delivery and accountability through a smaller and more highly-skilled pool of individuals who validate judgments made against the NCRS.

**Recommendation:** Immediately, the force should review where and with whom responsibility for day to day oversight of the application of, and compliance with, HOCR and the NCRS is held; and ensure that this is reflected in relevant policy and guidance and communicated to staff.

The force has demonstrated a commitment to improve crime data recording and is open to scrutiny and external examination of the way it operates. Recent activities include a peer review by Essex Police in January 2014 and, in March 2014, an assessment from the College of Policing on the way serious sexual offences are handled by the force.

To help to maintain standards, the force operates a confidential phone line through which staff can report bad practice or inappropriate behaviour by individuals. This is relatively well-known within the organisation and is available for all staff. However, some staff expressed concerns about the level of confidentiality and it was apparent that this lack of trust made some staff reluctant to use it.
**Recommendation:** Within three months, 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.

The force conducts a small number of audits of crime data integrity that focus on high-risk crime types. However, these could usefully be extended to include themed audits on areas such as crimes reported by third parties or of those reported by vulnerable victims.

The force understands the various routes by which crime is reported but there has been no examination of the integrity of the recording process across the various reporting channels to inform and improve the integrity of crime data. We could find no evidence that such risks have been specifically included within the force risk register at any level.

The findings from audits are reported to force performance meetings and are circulated widely with action directed towards those managers responsible for any areas requiring improvement. This is good practice.

Quality assurance audits are carried out in the force control room; each day supervisors review five violent crime and six anti-social behaviour incidents for NCRS and National Standards for Incident Recording (NSIR) compliance. The findings from this process are communicated to staff and their line managers. While this is good practice, it is a very narrow review which excludes a large number of other types of incident from effective monitoring and supervisory oversight; this is a significant hurdle for the force to overcome in achieving higher standards in their application of the HOCR and NCRS.

**Recommendation:** Within three months, 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.
Systems and processes

Accuracy of crime recording

HMIC examined 99 incident records\(^6\) and found that 86 crimes should have been recorded. Of the 86 crimes that should have been recorded, 74 were. Of the 74, two were wrongly classified and two were recorded outside the 72-hour limit allowed under the HOCR. This is of material concern as it means that some victims’ crimes are not being recorded and they are not getting the service they deserve (for example, because certain victim support services are only triggered when a crime is recorded).

**Recommendation:** Within three months, 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.

The force has a centralised crime management unit through which the force estimated that it directly records four percent of the total of its recorded crime, this is a small proportion of the force’s recorded crime and therefore our inspection of this unit was limited. A review of four calls from members of the public found that four crimes should have been recorded. Of the four crimes that should have been recorded, all four were. All were correctly classified and recorded within the 72-hour limit allowed under the HOCR.

We examined 54 reports that were held on the protecting vulnerable people (PVP) unit’s case administration and tracking system (CATS) database.\(^7\) From these, we found that 37 crimes should have been raised. Of the 37, we found that only 14 had been recorded. Of these 14, one was wrongly classified. Two were recorded after the 72-hour limit allowed under the HOCR. As some of these records related to sexual offences and assaults on vulnerable adults and children, this is a significant concern.

We found an ‘investigate-to-record’\(^8\) approach being followed for internal and external referrals made and recorded on the CATS database. This approach

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\(^6\) An incident in this context is a report of events received by the police, recorded on the electronic incident systems, that requires police attention. Whether or not an incident report becomes a crime record is determined on the balance of probability that a notifiable offence has occurred as set out in the Home Office Counting Rules. If an incident does not turn out to be a crime, it must still be logged in an auditable form on the force’s incident-recording system or some other accessible or auditable means.

\(^7\) CATS is a database used to monitor referrals for incidents including child protection and vulnerable adults. It is accessible to different agencies including police, local authorities and health workers and ensures there is an audit trail to monitor the progress taken to support victims.

\(^8\) This means that the police do not record the incident as a crime at first, but instead investigate the matter in order to establish whether a crime has been committed.
has led to the degradation of information, a need for repetition of information from victims, lost opportunities for intelligence and analysis and, ultimately, a failure to record some crime. The identification of crimes through information recorded on the CATS database highlights a potential risk of under-recording crime in the force and there was limited evidence of any supervision of the system or other control measures to address this.

**Recommendation:** Immediately, 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.

The force has an established procedure for recording and transferring crimes to and from other forces. Information is sent promptly by secure e-mail and the incident is only closed when a reference has been provided by the receiving force.

**Out-of-court disposals**

Out-of-court disposals include cautions, Penalty Notices for Disorder (PND), cannabis warnings and community resolutions. The HOCR (section H) states that national guidance must be followed.

**Cautions** – Of the 20 cautions we dip-sampled, we found that in all 20 cases the offender’s previous history made them suitable to receive a caution. In 19

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9 A form of immediate financial punishment used by police to deal with low-level offending such as being drunk and disorderly, retail theft, and minor criminal damage.

10 A cannabis warning is a non-statutory disposal for cases of possession of cannabis for personal use. It constitutes a warning to the offender and confiscation of the cannabis.

11 Resolution of a minor offence or anti-social behaviour incident through informal agreement between the parties involved, for example often involving the offender making good the loss or damage caused.

12 National guidance for the use of out-of-court disposals is detailed in a number of documents:

- **Home Office Circular 016/2008: Simple Cautioning – Adult Offenders.** Available from www.xact.org.uk
cases we found evidence that the offender was made aware of the nature and future implications of accepting the caution. Out of the 18 cases where there was a victim to consult, 10 showed that the victims’ views had been considered.

**Penalty Notices for Disorder** – We dip-sampled 20 PND disposals and found that the offender was suitable to receive a penalty notice in all 20 cases. In all 20 cases we found evidence that the offender had been made aware of the nature and future implications of accepting the penalty notice. Out of the 11 cases, where there was a victim to consult, we found that all 11 victims had their views considered when the police decided to issue a penalty notice.

**Cannabis warnings** – We dip-sampled 20 cannabis warnings and found that the offender was suitable to receive a warning in 17 cases. In all 20 cases we found evidence that the offender had been made aware of the nature and implications of accepting the warning.

**Community resolutions** – We took a dip-sample of 22 community resolutions and found that in 15 cases, the offender either had no previous offending history or that the offender’s past history still justified the use of the community resolution. Out of the 22 resolutions where there was a victim, 19 cases showed that the wishes and personal circumstances of the victim had been properly considered. 12 cases showed that the agreed outcome was meaningful and appropriate.

Staff are encouraged to use out-of-court disposals responsibly and criteria on their application are provided in guidance documents which are available to all staff via the force intranet. A bespoke pro-forma checklist is used to guide staff to use the right disposal decisions. Following this procedure helps to promote compliance with the HOCHR and other national guidance.

The force has also introduced a scrutiny group with an external chair. Its role is to review a randomly selected number of cases and provide feedback on the appropriateness of the out-of-court disposal decision. This oversight provision enables the force to promote best practice and identify areas for development.

As the force increases its use of out-of-court disposals it will need to ensure that staff have a clear understanding of the appropriate use of these disposal options through effective training and guidance. The force will also need to ensure that the Investigation Management Unit (IMU) actively promotes compliance with the HOCHR and national guidelines for their use.

**No-crime**

No-crime refers to an incident that was initially recorded as a crime but has subsequently been found not to be a crime on the basis of additional verifiable information. In Suffolk we examined 74 no-crime records and found 64 to be compliant with the HOCHR and the NCRS.
**Recommendation:** Immediately, 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.

The errors we found related to the threshold required for additional verifiable information. This highlights a potential lack of understanding from staff of the use of additional verifiable information to confirm or refute that a crime has taken place. The force retains 13 members of staff who are designated as decision-makers (DDM) for no-crimes. This is a high number of DDM for the force to ensure consistency in their assessment of no-crime decisions.

**Recommendation:** Within six months, 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 the force should ensure designated decision-makers are independent of investigations.

**Victim-centred approach**

The force promotes a victim-centred approach to crime recording, disposal options and no-crime decisions. It communicates widely with different groups within its communities to increase confidence and encourage the reporting of crime.

For example, the force has taken action to enable improved access for migrant communities to report crime and has identified RAF, Army and US forces’ personnel as minority communities and is encouraging the reporting of crime from their bases.

**Rape offences**

The force has a documented policy and procedure for dealing with reports of rape, although this makes no specific reference to the ethical recording of crime. The policy does, however, provide guidance on how staff should deal with no-crime decisions for reported rapes and for the transfer of rape crimes between forces. A practical guide is also available for DDM and the criminal justice unit staff on how to finalise crimes of rape once recorded.

Our audit identified that only two of six rape offences we reviewed were correctly recorded. In March 2014 the force removed a gatekeeper function within its rape procedures; this was perceived to have created delay in the recording process with some offences not being captured at all. HMIC found evidence that the force was ‘investigating-to-record’ rather than recording the crime at the time of reporting. This is a serious concern as it affects the credibility of the force among its communities; its understanding of the totality of
crime in those communities and therefore the effectiveness of decision-making in how it uses its resources; the service received by victims of crime; and its effectiveness in bringing offenders to justice.

**Recommendation:** Immediately, 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.

**IT systems**

The force has a single computer system for each of its incident (STORM) and crime (CIS) recording functions; these systems are not linked. The force is due to implement the ATHENA computer system in the autumn of 2015; this system is expected to provide a solution to the lack of shared information and as such should enable improved data quality.

The force maintains two main standalone systems. It has the non-crime category of CIS which is used to record making off without payment incidents, domestic abuse incidents, and hate incidents. The second system is the Empowering-Communities Inclusion and Neighbourhood Management System (E-CINS), which is used to case-manage anti-social behaviour incidents. We dip-sampled these systems and found evidence of unrecorded crimes in both systems. Of particular concern was that all 10 incidents of making off without payment (from petrol stations), failed to comply with the NCRS and the HOCR. This suggests that the force policy for dealing with making off without payment incidents does not comply with the HOCR and the NCRS.

**Recommendation:** Within three months, 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 in respect of these offences are aware of the requirements to work within these policy guidelines.
People and skills

We found that staff and supervisors responsible for managing out-of-court disposals and no-crime decisions within specialist investigation departments had an appropriate knowledge of the NCRS and the HOCR.

However, despite input from the force crime registrar (FCR), and access to the national computer-based training packages (NCALT), knowledge of NCRS and the wider HOCR was limited amongst operational staff. Training for dedicated decision-makers (DDM) on NCRS and HOCR rules is limited to two hours’ personal tuition from the FCR, and of the operational staff interviewed by HMIC during the inspection, many indicated that they had received little or no training on the subject.

**Recommendation:** Within six months, 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.

During the fieldwork we did not find any evidence of management pressure being applied to under or mis-record crimes to reach performance targets. The consistent messages from chief officers to base decisions on the victims needs are reaching frontline staff and creating a culture where the victim is at the centre of all crime investigation decisions. The reasons for the NCRS failures are more associated with poor understanding of the HOCR alongside some compliance and workload pressures experienced by individuals or teams.

**Force crime registrar**

The FCR is the final arbiter for crime-recording decisions and matters are routinely referred to them for advice, guidance and direction. The FCR has the full support of the assistant chief constable with overall responsibility for crime data and they meet monthly formally to discuss crime recording issues.

The FCR has limited capacity for audit and there is no resilience for the role of FCR in that there is no identified deputy; this is a risk for the force should he become unavailable.

The FCR has direct involvement in the development of force policy and procedure and is actively involved in the training and mentoring of the 13 designated decision-makers across the force.
Recommendation: Within three months, the force should introduce a structured regular audit plan and ensure the FCR\(^\text{13}\) 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.

Recommendations

Immediately

1. The force should review where and with whom responsibility for day to day oversight of the application of, and compliance with, HOCR and the NCRS is held; and ensure that this is reflected in relevant policy and guidance and communicated to staff.

2. 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.

3. 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.

4. 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;

\(^{13}\) The person in a police force who is responsible for ensuring compliance with crime-recording rules. The HOCR provide that he is ultimately responsible for all decisions to record a crime or to make a no-crime decision, as the final arbiter. The force crime registrar’s responsibilities include training staff in the crime-recording process and carrying out audits to check that the force is complying with all applicable rules.
• 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.

Within three months

5. 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.

6. 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.

7. 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.

8. 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.

9. 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.
Within six months

10. 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.

11. 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.
Our examination of records will be used as part of a statistically robust national audit to allow HMIC to report a figure for national crime recording accuracy across the 43 Home Office forces within our final report to be published in autumn 2014. The audit undertaken at a force level is not of a sufficient size to be statistically robust and is therefore used alongside our fieldwork interviews to form qualitative judgments only.

<table>
<thead>
<tr>
<th>Incidents reviewed</th>
<th>Crimes identified</th>
<th>Crimes recorded</th>
</tr>
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<tbody>
<tr>
<td>HMIC reviewed the following number of incident records in Suffolk Constabulary. These include reported incidents of burglary, violence, robbery, criminal damage and sexual offences.</td>
<td>From these incidents HMIC identified the following number of crimes.</td>
<td>From these identified crimes Suffolk Constabulary recorded the following number of crimes.</td>
</tr>
<tr>
<td>99</td>
<td>86</td>
<td>74</td>
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<table>
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<tr>
<th>Crimes reported directly from the victim</th>
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<tbody>
<tr>
<td>HMIC reviewed the following number of reports of crimes that were reported directly by telephone to the Suffolk Constabulary centralised crime recording unit. These include reported incidents of burglary, violence, robbery, criminal damage and sexual offences.</td>
</tr>
<tr>
<td>From these reports received directly by telephone from the victim by the centralised crime recording unit HMIC identified the following number of crimes that Suffolk Constabulary should have recorded.</td>
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<tr>
<td>From these identified crimes Suffolk Constabulary recorded the following number of crimes.</td>
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<td>4</td>
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</tbody>
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<table>
<thead>
<tr>
<th>Crime reports held on other systems</th>
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<tbody>
<tr>
<td>HMIC reviewed the following number of other reports recorded by Suffolk Constabulary and held on systems other than their crime system.</td>
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<tr>
<td>From these reports HMIC identified the following number of crimes that Suffolk Constabulary should have recorded.</td>
</tr>
<tr>
<td>From these identified crimes Suffolk Constabulary recorded the following number of crimes.</td>
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<tr>
<td>54</td>
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<table>
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<tr>
<th>No-crimes</th>
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<tbody>
<tr>
<td>HMIC reviewed the following number of recorded crimes of rape, violence and robbery which Suffolk Constabulary had subsequently recorded as no-crime.</td>
</tr>
<tr>
<td>From these HMIC assessed the following number of no-crime decisions as being correct.</td>
</tr>
<tr>
<td>74</td>
</tr>
</tbody>
</table>
Part C: Additional detailed inspection findings

Our detailed findings are set out against three headings: leadership and governance, systems and processes, and people and skills.

Leadership and governance

1 Does the force have arrangements at a senior level to ensure there is confidence in recorded crime figures and all aspects of the HOCR?

1.1 How is Suffolk Constabulary ensuring that leadership responsibilities and expectations for crime data integrity are clearly defined and unambiguously communicated to staff?

The assistant chief constable (ACC) is the force lead for crime data quality in Suffolk Constabulary. The force’s headline message is one that promotes compliance with HOCR, encouraging a victim-centric approach even if this means an increase in volume. This is reflected in the recent introduction of a ‘Vision, Mission and Philosophy’ statement which applies to all aspects of policing in Suffolk. This message has been communicated through road shows, intranet messages, and personal briefings by the ACC and the force crime registrar (FCR). It is also reflected in the views expressed by staff we interviewed although some did not know its origin. The ACC also holds responsibility for performance but there is no clear separation between that and his portfolio for crime data integrity.

The force seeks to continuously improve which is reflected by the work of the joint improvement board and Suffolk performance meetings. It is open to scrutiny and examination of the way it operates. Recent activities included a peer review from Essex Police on crime recording (January 2014) and a review from the College of Policing on the way serious sexual offences are handled (March 2014).

1.2 How does Suffolk Constabulary ensure it has a proportionate approach to managing the strategic and organisational risk of recording crime data?

The top-level message on crime recording has been documented and communicated to staff and this is underpinned by force policy and procedural guidance with reference to the HOCR, NCRS and National Standard of Incident Recording (NSIR). There is also detailed guidance for specific offence types, all of which would benefit from a generic summary (and flow chart) of the key processes and requirements for the accurate recording of crime through its various reporting routes against the NCRS.
It was unclear to staff who was responsible for ensuring day to day compliance with the HOCHR and NCRS. This responsibility should ideally be positioned with the force control room where there is oversight of recorded incidents, and at the investigation management unit (IMU) for confirmation/classification for those incidents recorded as a crime. This will enable independence from service delivery and accountability through a smaller and more highly-skilled pool of individuals who validate judgments made against the NCRS.

1.3 How does Suffolk Constabulary use HOCHR, NCRS, and NSIR to ensure there is confidence that crime is recorded accurately?

The FCR routinely conducts a small number of audits of crime data integrity that focus on high-risk crime types. These could usefully be extended to include themed audits such as non-crime categories, third party reports of crime or those reported by vulnerable victims. The findings from audits are circulated widely with action directed towards those managers responsible for any areas requiring improvement. Where identified, erroneous decisions against the NCRS and the HOCHR are corrected. The findings from audits are also reported to the monthly force performance meeting and the FCR provides detailed advice and guidance on complex and contentious issues.

To complement the regime of force audits, the force control room operates a quality assurance process in which supervisors review five violent crime and six anti-social behaviour (ASB) incidents for NCRS and NSIR compliance each day. This will soon change to 10 incidents per supervisor every 2 months. The findings from this process are communicated to staff and their line managers. While any form of quality assurance is good practice, it is a very narrow review which excludes a large number of other types of incident from effective monitoring and supervisory oversight; this is a significant hurdle for the force to overcome in achieving higher standards in their application of the HOCHR and NCRS.

While the force focuses its audits on the types of crime that present increased risk, there is no examination of cross system data quality. There are various reporting channels through which crimes can be recorded and these need to be monitored and checked to improve crime recording processes. We could find no evidence that such risks have been specifically included within the force risk register at any level.

There is no system of abbreviated crime reports for less-serious crime although we found that crimes are investigated and supervised to a level of detail that reflects their risk.
Systems and processes

2  Does the force have systems and processes in place to ensure that: crime is correctly recorded in accordance with HOCR and NCRS; standards of out-of-court disposals are maintained; and no-crime decisions are correct?

2.1  How does Suffolk Constabulary effectively manage and supervise incidents, other reporting routes and crime records in order to ensure that crimes are correctly recorded?

We examined 99 incident records and found that 86 crimes should have been recorded. Of the 86 crimes that should have been recorded, 74 were. Of the 74, two were wrongly classified and two were recorded outside the 72-hour limit allowed under the HOCR.

The force has a centralised crime management unit through which we have estimated that the force records 4 percent of the total of its recorded crime; this is a small proportion of the force’s recorded crime and therefore our inspection of this unit was limited. A review of four calls from members of the public found that four crimes should have been recorded. Of the four crimes that should have been recorded, all four were. All were correctly classified and recorded within the 72-hour limit allowed under the HOCR.

We examined 54 reports that were held on the protecting vulnerable people (PVP) unit’s case administration and tracking system (CATS) database. From these, we found that 37 crimes should have been raised. Of these 37, we found that only 14 had been recorded. Of these 14, one was wrongly classified. Two were recorded after the 72-hour limit allowed under the HOCR. As some of these records related to sexual offences and assaults on vulnerable adults and children, this is a significant concern.

The majority of cases that we examined which failed to comply with the NCRS could and should have been recorded at the time of first report. Instead, an investigate-to-record approach has been followed which results in the degradation of information, repetition of information from victims, lost opportunity for intelligence and analysis and, ultimately, a failure to record some crime.

The identification of crime from referrals made and recorded on the CATS presents a significant risk of under-recording crime, and there was limited evidence of supervision of the system or any other control measures. The force recognises this issue and on 2 April 2014 introduced a requirement to record any allegation of crime onto its incident management system (STORM). However, a dip-sample of five recent incidents on STORM revealed that only two of the four crimes identified were recorded on the crime recording system (CIS) which indicates that more work is required to improve NCRS compliance.
The central referral and tasking unit (CRTU) acts as the gatekeeper for entries on CATS. The process used by the CRTU has safeguarding issues as its primary focus and crime recording is very much a secondary consideration. Partner agency investigations often overlook the obligation of crime recording and an ‘investigate-to-record’ approach is often applied which has resulted in the further under-recording of crime through this system.

The process for dealing with transferred crime works well with information being sent promptly by secure e-mail and only closed when a reference has been provided by the receiving force.

Evidence indicates that incidents on STORM and crimes on CIS are supervised in a way that is proportionate. There has been some considerable progress in this area as supervisory entries on the previous crime recording system (POLARIS) were less clear and often absent.

2.2 How does Suffolk Constabulary ensure that out-of-court disposals suit the needs of victims, offenders and the criminal justice system?

When considering out-of-court disposals the force needs to ensure it only uses them in line with appropriate guidance so that only offenders who are entitled to be offered an out-of-court disposal receive them.

**Cautions** – Of the 20 cautions we dip-sampled, we found that in all 20 cases the offender’s previous history made them suitable to receive a caution. In 19 cases we found evidence that the offender was made aware of the nature and future implications of accepting the caution. Out of the 18 cases where there was a victim to consult, 10 showed that the victims’ views had been considered.

**Penalty Notices for Disorder** – We dip-sampled 20 PND disposals and found that the offender was suitable to receive a penalty notice in all 20 cases. In all 20 cases we found evidence that the offender had been made aware of the nature and future implications of accepting the penalty notice. Out of the 11 cases, where there was a victim to consult, we found that all 11 victims had their views considered when the police decided to issue a penalty notice.

**Cannabis warnings** – We dip-sampled 20 cannabis warnings and found that the offender was suitable to receive a warning in 17 cases. In all 20 cases we found evidence that the offender had been made aware of the nature and implications of accepting the warning.

**Community resolutions** – We took a dip-sample of 22 community resolutions and found that in 15 cases, the offender either had no previous offending history or that the offender’s past history still justified the use of the community resolution. Out of the 22 resolutions where there was a victim, 19 cases showed that the wishes and personal circumstances of the victim had been properly
considered. 12 cases showed that the agreed outcome was meaningful and appropriate.

2.3 Are no-crime decisions for high-risk crime categories correct and is there robust oversight and quality control in Suffolk Constabulary?

No-crime refers to an incident that was initially recorded as a crime but has subsequently been reclassified on the basis of additional verifiable information. We examined 74 no-crime records and found 64 to be compliant with HOCR and NCRS.

The errors we found related to the threshold required for additional verifiable information. This highlights a potential lack of understanding from staff in the use of additional verifiable information to confirm or refute that a crime has taken place. The force retains 13 members of staff who are designated as decision makers (DDM) for no-crimes. This is a high number of DDM for the force to ensure consistency in their assessment of no-crime decisions.

2.4 How does Suffolk Constabulary promote a victim-centred approach to crime recording and associated outcomes?

Suffolk Constabulary seeks to maximise its victim focus for crime recording, investigation and disposal. This is reflected in the work of the satisfaction improvement board, confidence board and the ‘forging the links’ focus group which aims to improve victim satisfaction and public confidence. The force has increased its use of community resolutions (which account for about 20 percent of all disposals) although there remains scope to increase victim involvement. Outcomes are reviewed by the IMU to consider whether they reflect the victim’s wishes that were expressed in the victim contract which was completed at the start of the crime recording process.

Action has been taken to enable access for reporting crime from migrant communities. This is enabled by the use of Language Line, over 30 third party reporting centres, and by targeted activity from PCSOs. The force has also identified RAF, Army and US forces’ personnel as minority communities and is encouraging the reporting of crime from their bases.

2.5 How does Suffolk Constabulary ensure systems for receiving, recording and managing reported crimes of rape are robust?

Our audit identified that only two of six rape offences were correctly recorded against NCRS. The force has recently removed a gatekeeper function within its rape procedures which was perceived to have created delay in the recording process with some offences not being captured at all. Reality checks among neighbourhood and response teams indicate that this has improved recording processes but there remains an investigate-to-record approach rather than recording the crime at the point that it is reported.
The force has a documented policy and procedure for dealing with reports of rape albeit this makes no specific reference to the ethical recording of this type of crime. A practical guide was available for DDM and the criminal justice unit staff on how to finalise crimes of rape once recorded. Policy and procedure also provides guidance for dealing with no-crime applications for reported rapes and for the transfer of these crimes between forces. We found that specialist investigators and other operational staff knew that reports of rape should be recorded immediately, although there was some uncertainty about who had responsibility for doing so. There was no external scrutiny of rape no-crime decisions from outside the force.

2.6 How do Suffolk Constabulary’s IT systems allow for efficient and effective management of crime recording?

The force has a single computer system for each of its incident (STORM) and crime (CIS) recording functions; these systems are not linked.

The force maintains two key standalone systems; the non-crime category of CIS, which is used to record making off without payment incidents, domestic abuse incidents, and hate incidents, and ECINS, which is a cloud-based application used to case-manage anti-social behaviour incidents. We dip-sampled these systems and found some crimes had been missed in both systems. Of particular concern was that all 10 cases of making off without payment incidents (from petrol stations), failed to comply with the NCRS and the HOCR. This suggests that the force policy of dealing with incidents of making off without payment does not comply with NCRS.

There is no interface between the force systems which means that officers have to double- or even triple-key in data onto force systems. The force is due to implement the ATHENA computer system in the autumn of 2015; this system is expected to provide a solution to this inefficiency and should enable improved data quality.

It is intended that a multi-agency secure hub will replace the CATS database in the months ahead and the templates used in its design will help to identify and support the correct recording of crime disclosed from referrals through this system.

Crimes identified from professional standards investigations are correctly recorded as restricted-access crimes on CIS, either at the time of first disclosure or when CPS advice has been received. The FCR does not routinely review professional standards investigations for compliance with NCRS and HOCR, but has on occasions provided advice. The professional standards investigations are included within the force’s Annual Data Return to the Home Office.
People and skills

3 Does the force have staff whose conduct and skills ensure accurate crime recording?

3.1 What arrangements does Suffolk Constabulary have in place to ensure that staff have the necessary skills to ensure accurate crime recording?

We found that staff and supervisors with responsibility for managing out-of-court disposals and no-crimes in specialist investigation departments had an appropriate knowledge of NCRS and HOCR.

However, despite inputs from the force crime registrar (FCR) and access to the national computer-based training packages (NCALT), knowledge of NCRS and the wider HOCR is limited among operational staff. Training for DDM on NCRS and HOCR rules is limited to two hours personal tuition from the FCR and many operational staff indicated that they had received little or no training on the subject.

There are 10 identified DDM posts in Suffolk Constabulary which are currently filled by 13 individuals at detective chief inspector and inspector level. They make decisions on no-crimes and crime outcomes against the HOCR and our audit indicates scope for improvement in the application of these decisions. The DDM are positioned either on local policing areas or within the PVP command which is not independent of the investigative process and the force is therefore encouraged to use a smaller cadre that is independent of the investigative process. Such an approach would be more efficient and effective in making decisions against the HOCR.

A number of staff misunderstood the 72-hour HOCR time limit for crime recording and this could lead to delays in recording and some under-recording. Therefore, the force is urged to improve understanding of the HOCR amongst key staff by targeting training at roles in which key HOCR decisions are taken.

3.2 How do the behaviours of Suffolk Constabulary staff reflect a culture of integrity for crime recording practice and decision-making?

In our audit of CATS and CIS records for sexual offences, we found examples of shorthand notes and unprofessional language. The force needs to challenge inappropriate language on CIS from its staff. A glossary of acceptable terms has been developed and the force needs to seek cooperation on its use by partners and to enforce compliance amongst its own staff.
3.3 How is the accuracy of crime recording in Suffolk Constabulary actively overseen and governed by the force crime registrar (FCR)?

The FCR is the final arbiter for crime-recording decisions and matters are routinely referred to him for advice, guidance and direction. The FCR acts objectively and with integrity and has the full support of the chief officer lead; they meet formally on a monthly basis to discuss crime recording issues. The FCR has direct input into the development and drafting of force policy and procedures.

The FCR has limited capacity for audit against the crime data quality risks. The force should therefore explore means of increasing the FCR capacity; suggestions include pooling such resources with other forces, or more peer reviews being conducted (such as that recently completed by Essex). There is no resilience for the role of FCR as there is no identified deputy which is a risk for the force should he become incapacitated or otherwise unavailable.