

Crime data integrity

Inspection of West Mercia Police

November 2014

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Introduction

In its 2013/14 inspection programme¹, 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 were 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 bodies² 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.justiceinspectors.gov.uk/hmic/

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.

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.

³ *Crime recording: A matter of fact – An interim report of the inspection of crime data integrity in police forces in England and Wales*, paragraph 1.20.

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:

- An examination of crime records for the period 1 November 2012 to 31 October 2013;
- 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;
- Visits to forces where inspectors assess local crime-recording arrangements under three headings: leadership and governance; systems and processes; and people and skills; and
- 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.

Scope and structure of 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

West Mercia Police has been in an alliance with Warwickshire Police since 2012 and both forces have been through an extensive remodelling process resulting in the two forces working to a single operating model with joint leadership. The implementation of the alliance has delivered considerable savings and maintained performance with a reduction in the workforce.

West Mercia is the fourth largest geographic police area in England and Wales with just under 2,000 officers. The alliance progressed when the forces needed to respond to the comprehensive spending review and make considerable savings.

West Mercia Police is divided into five local policing areas (LPA) and Warwickshire is divided into two. Therefore there are seven LPA across the alliance, each with their own management structure reporting to a chief superintendent for each force and under the leadership of a single assistant chief constable (ACC). The director of finance is the named officer responsible for crime data integrity within the alliance. She is also responsible for business assurance and improvement. The forces have retained their individual chief constables and deputy chief constables, with separate police and crime commissioners (PCC) in accordance with legislative requirements.

There is a clear expectation throughout the alliance that crimes are correctly recorded, investigated and concluded against NCRS, HOCA and national guidelines, applying a strong victim focus. This is reflected in the findings from our audit and evident in the culture among staff. The forces demonstrate a strong desire to improve continuously and are doing so through an active review of structures, processes and behaviours as they continue to develop the alliance.

Most officers and staff engaged in the crime-recording process are aware of the headline message to ensure integrity in crime recording. However, junior staff engaged in crime-recording processes would benefit from increased clarity on the subject.

Recommendation: With immediate effect, chief officers should ensure that all police officers and police staff are given clear a message about their specific responsibilities and accountabilities for compliance with the NCRS and the HOCA.

The force has an established governance structure for monitoring performance that includes crime data integrity. The force maintains policies and procedures on crime reporting, crime management and criminal investigations which meet the requirements of NCRS and the HOCA.

Officers and staff can raise concerns about unethical practices of any kind through a number of confidential, internal reporting routes into the professional standards department (PSD). PSD gives presentations on police ethics and integrity to all new staff but despite this, many officers and staff were not aware that these confidential routes could be used to report concerns about the integrity of crime recording.

Recommendation: With immediate effect, chief officers should ensure that all police officers and police staff have unimpeded access to, and reliable knowledge of an adequate system for the confidential reporting and effective handling of concerns on crime recording.

One of the responsibilities of the force crime registrar⁶ (FCR) is to ensure that the force complies with the NCRS and the HOOCR. Additionally, the FCR has responsibility for overseeing force compliance with the National Standard for Incident Recording (NSIR)⁷.

The will and motivation of the alliance to change the culture from the historical performance-driven one to a more victim-centred approach is genuine and clear. Positive indicators of this approach are evident in the establishment of the new alliance crime bureau model across both forces, the weekly executive board agreeing the crime data integrity self-assessment action plan and the quarterly senior detectives' forum.

Senior managers are encouraged to secure accurate crime recording and we found no evidence of pressure, explicit or implied, to under-record or incorrectly record crime. This message is reaching frontline staff. While there is a proper desire to reduce crime, particularly burglary, this is not done at the cost of compliance with NCRS or the HOOCR.

There is confusion over who is chief officer lead for crime data integrity. We found very few members of staff knew that it was the director of finance. We recognise the important fact is that staff appreciate the key messages on the subject but it would be beneficial if the force lead was personally to reinforce those messages.

⁶ The person in a police force who is responsible for ensuring compliance with crime-recording rules. The HOOCR 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.

⁷ 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.

The headline expectation from chief officers for crime recording is one that promotes compliance with NCRS and the HOCR, encouraging a victim-centric approach even if this means an increase in the volume of crime. However, staff were unable to recall any expectations of crime-recording standards set out directly by the chief officer lead. They regarded the guidelines and comments set out in the force intranet as coming from 'the force command team'. A clear voice from the senior command team on the expected standards would help officers and staff recognise that crime data integrity is a core element of policing standards within the force.

The associated risks of not recording crime accurately, leading, for example, to a reduction in victim satisfaction and public confidence, and lost opportunities for crime pattern analysis and intelligence, are not recorded and scrutinised through the alliance risk register. Given some of the challenges the force is experiencing in terms of crime-recording compliance together with the extensive change programme and a new crime bureau, the risk of poor crime data should feature in the risk management process.

Recommendation: Immediately, the force should review its assessment of the risks associated with crime data integrity and ensure that they are included in, and monitored through, the alliance risk register and that any necessary actions identified to secure crime data integrity are progressed.

The capacity and resource committed to risk-based audit and monitoring of both crime and incidents could be improved. Some audits do take place for serious and sexual offences and an extensive audit schedule has been presented to us. At the moment this schedule is aspirational and we question whether it can be achieved given the current resources available to the FCR.

Recommendation: Within three months, the force should ensure the FCR has sufficient resources with the skills necessary 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 audit programme should be able to respond to emerging issues and test the effectiveness of any changes.

Systems and processes

Accuracy of crime recording

We examined 130 incident records⁸ and found that 100 crimes should have been recorded. Of the 100 crimes that should have been recorded, 74 were. Of the 74, three were wrongly classified and one was recorded outside the 72-hour limit allowed under NCRS and the HOCR. This is of serious concern as it means that some victims' crimes are not being recorded and that these victims are not receiving the service they deserve (because, for example, certain victim support services are only triggered once a crime is recorded).

The force also has a centralised crime recording unit through which the force estimates that it records approximately eight percent of the total of its recorded crime. This unit records reports of crime directly from members of the public that do not require the creation of an incident record. Our review of this unit (of 11 records) found that of the 11 crimes that should have been recorded, all were recorded correctly. The crime bureau is a new alliance-wide model and early signs are that it is likely to be an effective approach to crime recording for the forces.

We also examined 50 referrals from police and partners that were recorded on the force CRIMES system as non-crimes, and which were referred to staff from the protecting vulnerable people (PVP) unit. We found that from those 50 reports, 18 crimes should have been recorded. The force had recorded 10 out of the 18 correctly. As some of these records related to sexual offences and assaults on vulnerable adults, this is a significant cause for concern and is a matter of material and urgent importance.

The alliance has already started to address this issue and from August 2014, all such incidents should be recorded on the CRIMES system.

Recommendation: Within three months, the force should establish and begin operation of an adequate system for the auditing by the FCR of all referrals to the force from other organisations of incidents and reports of crime, with special attention being directed to those involving vulnerable adults and children.

Supervisors currently monitor live calls from the public taken by call-handlers. This provides a general check on the quality of calls and promotes accurate crime recording and the provision of a victim-centred approach. These checks do not, however, directly assess compliance with the NCRS or the HOCR.

⁸ 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.

Out-of-court disposals

Out-of-court disposals include cautions, Penalty Notices for Disorder (PND),⁹ cannabis warnings¹⁰ and community resolutions.¹¹ The HOCR (section H) states that national guidance must be followed¹².

Cautions – Out of the 20 cautions we dip-sampled, we found that in all cases the offender’s previous history made them suitable to receive a caution. In 17 cases we found evidence that the offender was made aware of the nature and future implications of accepting the caution. Out of the 15 cases where there was a victim to consult, all showed that the victims’ views had been considered.

Penalty Notices for Disorder – We dip-sampled 20 PND and found that the offender was suitable to receive a penalty notice in 12 cases. In 13 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 eight cases where there was a victim to consult, we found that none of the 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 19 cases. In all 19 cases we found evidence that that the offender had been made aware of the nature and implications of accepting the warning.

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 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 http://www.xact.org.uk/information/downloads/Pace/HOC_16-2008.pdf
- *Simple Cautions For Adult Offenders*, 14 November 2013. Available from www.justice.gov.uk
- *Code of Practice for Adult Conditional Cautions*, 8 April 2000. Available from www.justice.gov.uk
- *Home Office Police Operational Guidance for penalty Notices for Disorder*, March 2005. Available from www.justice.gov.uk
- *ACPO Guidance on Cannabis Possession for Personal Use*, 28 January 2009. Available from www.acpo.police.uk

Community resolutions – We dip-sampled 20 community resolutions and found that in 11 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 20 resolutions where there was a victim, 17 cases showed that the wishes and personal circumstances of the victim had been properly considered. Four cases showed that the agreed outcome was meaningful and appropriate¹³.

The guidance on the use of community resolutions states that the offender should have no relevant offending history; otherwise a supervisor has to be informed and if the community resolution goes ahead, a record should be made of the reasons for the decision. It was therefore concerning to find that one of the community resolutions which had been used inappropriately involved an offender who had 26 previous convictions and who was given a 3-month suspended prison sentence in July 2013, but was issued with a community resolution for shoplifting in November 2014. A second offender had been issued with five community resolutions which were clearly not having the desired effect. Of even more concern were three community resolutions which related to serving prisoners for burglaries committed as far back as 2002. We also established that over 200 community resolutions had been issued to 15 serving prisoners. These are matters of serious and material concern.

The force had previously discovered this practice itself, and has taken steps to cancel these community resolutions. However, we still found four inappropriate community resolutions during our audit that had not been cancelled. We are satisfied that this practice no longer takes place.

There was little evidence that the selection and administration of out-of-court disposals was adequately supervised at a local level and force audits have yet routinely to include this issue. Notable failings include the lack of consultation and notification to victims of the use of PND as well as the inappropriate use of both PND and community resolutions.

Recommendation: Immediately, the force should take steps to ensure that the oversight of the decision to use out-of-court disposals is sufficiently robust so that they are only used in appropriate circumstances; in particular, that they are not used when the offending history of the offender should preclude their use, and that the views of victims are taken into account. This should be supported by the immediate introduction of an effective mechanism for monitoring the use of out-of-court disposals to ensure the decisions being taken to use the disposals are appropriate.

¹³ National guidance for community resolution directs that at the point the community resolution is administered an officer will need to confirm the offender admits the offence and explain the process to the offender – including how the offender will make good the harm caused. The implications of receiving a community resolution need to be explained to the offender – it does not form part of a criminal record but may be disclosed as part of an enhanced Disclosure and Barring Service check. The community resolution is to be recorded appropriately, in accordance with the NCRS and HOCR.

No-crimes

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. The decision to no-crime offences including rape, violent crime and making off without payment¹⁴ is made by officers who work in a centralised support unit. We examined 77 no-crime records and found 66 records to be compliant with HOCR and NCRS. This is a concern as the no-crime decisions we reviewed related to offences of rape, robbery and violence.

Recommendation: Immediately, the force should ensure guidance is provided to 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, and it should ensure no-crime decisions form part of the FCR audit programme.

Victim-centred approach

The alliance crime bureau policy clearly stipulates that crime will be recorded in accordance with NCRS and the HOCR and that incidents will be recorded in accordance with NSIR.

Chief officers advocate a victim-centred approach to crime recording, crime outcomes and no-crime. In recent guidance to crime decision makers (CDM) on recording violence with injury and making off without payment offences, the importance of a victim-focused approach has been reinforced.

The CRIMES system ensures victim contact is considered through automated victim contracts and officer reminder e-mails are sent out prior to the contact date; this ensures that the agreed contact with the victim is maintained. We found an intrusive review process by supervisors in place to ensure that victim contact and other investigation milestones are delivered. Victim aftercare appears to be guided by professional experience and management guidance.

We found frontline staff, including call-takers, understood the importance of meeting the needs of the victim when considering crime recording and investigation; they were polite, professional and helpful.

Customer satisfaction surveys are conducted by both forces in the alliance but these surveys are generic in respect of overall satisfaction, trust and confidence and do not have a specific focus on crime recording. Any themes arising from the surveys are presented to performance meetings.

¹⁴ Making off without payment is the offence of taking goods or services and then leaving without making payment. Most often this relates to people making off from petrol stations without paying for the petrol taken, but the offence can also apply to taxi fares and restaurant bills for example.

Rape offences

Current force guidance specifies at what point in time a rape should be recorded. The FCR scrutinises all recorded sexual offences to ensure they have been correctly recorded and classified against NCRS and the HO CR.

Although the FCR has ultimate responsibility for no-crime authorisations, the structure of the crime bureau is such that for day to day requests to authorise a submission of no-crime for rape, the CDM within the crime bureau are authorised to make all such decisions. We examined 30 rape no-crime records and found that 25 complied with NCRS and the HO CR. Most failures related to the interpretation of additional verifiable information.

The force procedural guidance includes instructions on how to deal with reports of rape made to the force but committed in another force area. However, knowledge of the guidance is variable among staff. We found that in most instances, officers receiving reports of rape and other sexual offences had promptly taken responsibility, ensured that a crime was recorded and that the victim received the appropriate care.

IT systems

The force uses the OIS computer systems for incidents and CRIMES for its crime-recording functions. The systems are linked but the transfer of information is limited only to the location of the crime. A list of potential crime reports is created in CRIMES and the unique reference number of each crime linked back to the OIS system. Both systems are well managed but would benefit from increased audit and information weeding. The intelligence system, GENIE, offers a searchable solution to storing data from both OIS and CRIMES.

The two alliance forces are merging their data onto the West Mercia Police CRIMES system and back record conversion of Warwickshire's data is ongoing. We were told of some issues with duplicate nominals and locations on the system which the alliance is trying to resolve. Not all staff understood the requirements specified by the national management of police information (MOPI) guidance. The force should consider whether its audit capacity should be temporarily increased during this conversion to ensure any data recording and compliance issues are immediately identified.

To limit mistakes, only a handful of people have access to change information on the OIS and CRIMES systems. If errors in data are identified, a request is sent out to a virtual group that forms a data quality panel chaired by the information compliance officer; the panel includes the crime bureau manager and the FCR.

There are clear instructions to officers and staff only to use the systems prescribed by the force. We found no evidence to indicate the presence of any unauthorised local databases.

A new single incident and crime management IT system to serve both forces in the alliance is being considered for the future. However, this is some way off and no definitive decision has been made yet about which system to procure. Attention will need to be paid to maintaining full compliance with all crime-recording requirements as this new system is implemented.

People and skills

Staff and supervisors responsible for managing crimes, out-of-court disposals and no-crimes, and those working in specialist departments, were generally found to have an appropriate knowledge of NCRS and HOCC although understanding varied. Frontline officers and staff have not received structured training on NCRS or HOCC, although guidance is accessible via the force intranet. There is a need to reinforce guidance across the alliance for frontline officers, including specialists in PVP.

Recommendation: Within six months, the force should conduct a NCRS and HOCC training needs analysis and, immediately thereafter, introduce a tiered, co-ordinated training programme on NCRS and the HOCC, prioritising personnel in roles which have an impact on quality, timeliness and victim focus, and in particular it should ensure the training is always made available to new personnel, specialists and supervisors.

The vast majority of staff understand what is expected of them and strive to 'do the right thing first time'; they also know the standards that must be achieved in relation to crime recording. Non-adherence to NCRS and HOCC is considered unacceptable at all levels of the force and we did not find any evidence of performance pressures leading to failures to record crime properly.

Force crime registrar

The FCR holds quarterly meetings with senior detectives to discuss crime recording and this has led to improved relationships and a better understanding of NCRS and HOCC by the officers concerned.

The FCR has extensive knowledge and experience in the management of crime data and the application of the NCRS and HOCC.

The role of FCR is to act as the force conscience and the importance of a visible, 'hands on' FCR cannot be overstated. The alliance currently relies upon one FCR across both areas with no deputy; it is a difficult task for one person to be sufficiently visible and effective across two forces. We have been told the FCR role profile is currently under review. As part of this review, due consideration should be given to providing resilience to the FCR role, to assist them to carry out the function effectively across the alliance.

The FCR should be independent from force performance delivery and should have a direct link to the chief officer lead for crime data. The post holder currently reports to the continuous improvement manager. The lack of a direct line management link with a chief officer could weaken the ability of the FCR to exert authority and maximise compliance with NCRS and the HOOCR.

Ultimately all crime-recording disputes are appropriately referred to the FCR who is seen as the final arbiter, although in practice such matters would first be referred to the crime bureau before the FCR. There are very few challenges and it is very rare for a decision made by the bureau to be reversed.

Recommendations

Immediately

1. Chief officers should ensure that all police officers and police staff are given a clear message about their specific responsibilities and accountabilities for compliance with the NCRS and the HOOCR.
2. Chief officers should ensure that all police officers and police staff have unimpeded access to, and reliable knowledge of, an adequate system for the confidential reporting and effective handling of concerns on crime recording.
3. The force should review its assessment of the risks associated with crime data integrity and ensure that they are included in, and monitored through, the alliance risk register and that any necessary actions identified to secure crime data integrity are progressed.
4. The force should take steps to ensure that the oversight of the decision to use out-of-court disposals is sufficiently robust so that they are only used in appropriate circumstances; in particular, that they are not used when the offending history of the offender should preclude their use, and that the views of victims are taken into account. This should be supported by the immediate introduction of an effective mechanism for monitoring the use of out-of-court disposals to ensure the decisions being taken to use the disposals are appropriate.
5. The force should ensure guidance is provided to 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, and it should ensure no-crime decisions form part of the FCR audit programme.

Within three months

6. The force should ensure the FCR has sufficient resources with the skills necessary 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 audit programme should be able to respond to emerging issues and test the effectiveness of any changes.
7. The force should establish and begin operation of an adequate system for the auditing by the FCR of all referrals to the force from other organisations of incidents and reports of crime, with special attention being directed to those involving vulnerable adults and children.

Within six months

8. The force should conduct a NCRS and HOCR training needs analysis, and immediately thereafter, introduce a tiered, co-ordinated training programme on NCRS and the HOCR, prioritising personnel in roles which have an impact on quality, timeliness and victim focus, and in particular it should ensure the training is always made available to new personnel, specialists and supervisors.

Part B: Audit findings in numbers

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.

Crimes reported as part of an incident record		
Incidents reviewed	Crimes identified	Crimes recorded
HMIC reviewed the following number of incident records in West Mercia Police. These include reported incidents of burglary, violence, robbery, criminal damage and sexual offences.	From these incidents HMIC identified the following number of crimes.	From these identified crimes West Mercia Police recorded the following number of crimes.
130	100	74
Crimes reported directly from the victim		
HMIC reviewed the following number of reports of crimes that were reported directly by telephone to the West Mercia Police centralised crime recording unit. These include reported incidents of burglary, violence, robbery, criminal damage and sexual offences.	From these reports received directly by telephone from the victim by the centralised crime recording unit HMIC identified the following number of crimes that West Mercia Police should have recorded.	From these identified crimes West Mercia Police recorded the following number of crimes.
11	11	11
Crime reports held on other systems		
Referrals	Crimes identified	Crimes recorded
HMIC reviewed the following number of referrals reported directly to West Mercia Police and held on other systems which contained reports of crime.	From these referrals HMIC identified the following number of crimes that West Mercia Police should have recorded.	From these identified crimes West Mercia Police recorded the following number of crimes.
50	18	10

No-crimes

HMIC reviewed the following number of recorded crimes of rape, violence and robbery which West Mercia Police had subsequently recorded as no-crime.	From these HMIC assessed the following number of no-crime decisions as being correct.
77	66

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 West Mercia Police ensuring that leadership responsibilities and expectations for crime data integrity are clearly defined and unambiguously communicated to staff?

Chief officers agreed a new alliance crime bureau model across Warwickshire and West Mercia police forces that went live in October 2013. This bureau includes the handling of telephone calls from officers requesting the recording of reports of crime following their contact with victims; this is known as 'crime call direct'. The bureau also deals with the recording of crime directly reported by victims via telephone, initial telephone investigation, and the supervision and allocation of crime reports through CDM. The purpose of the initiative is to provide a successful and effective function for the recording of crime which is governed by NCRS and the HOCR.

The structure of the crime bureau is capable of managing the high volume of less serious demand away from local policing, while ensuring compliance with NCRS. The new alliance crime bureau now deals with approximately 40 percent of all reported crime.

The quarterly CRIMES management board receives updates on audit and crime-recording matters and ensures both forces are provided with accurate and timely information. Minor or isolated issues are dealt with by the crime CDM and these are escalated to the FCR if thematic or systemic issues are identified. The FCR has a standing item to raise NCRS, HOCR or policy concerns to the group with the remit to identify good practice and agree any relevant corrective action in line with policy, and to promote compliance with NCRS and the HOCR. This remit also extends to the quarterly senior detectives' forum.

At a recent weekly executive board, chief officers agreed to a refreshed self-assessment action plan for crime data integrity. This is intended to facilitate ongoing continuous improvement.

The will and motivation of the alliance to change the culture from an historical performance-driven one to a more victim-centred approach is genuine and clear. Positive indicators of this are the establishment of the new alliance crime bureau model across both forces, the weekly executive board agreeing the crime data integrity self-assessment action plan and the quarterly senior detectives' forum.

Senior managers are encouraged to secure accurate crime recording and we found no evidence of pressure, explicit or implied, to under-record or incorrectly record crimes. This message is reaching frontline staff. While there is a proper desire to reduce crime, and particularly burglary, this is not done at the expense of NCRS or the HOCR.

There is confusion over who is chief officer lead for crime data integrity. We found very few members of staff knew that it was the director of finance. We recognise the important fact is that staff understand the key message but it would be beneficial if the force lead was personally to reinforce the message to ensure staff are in no doubt as to its content and where it comes from.

The headline message from chief officers on crime recording is one that promotes compliance with NCRS and the HOCR, encouraging a victim-centric approach even if this means an increase in volume. However, staff were unable to recall details of the crime-recording standards set out directly by the chief officer lead. They regarded the guidelines and comments mentioned on the force intranet as coming from the force command team. A clear voice from the senior command team about crime data and the expected standards would help confirm them as a central component of the expected policing standards within the force. Without a clear voice, the messages are in danger of being lost among a multitude of other centrally-sourced directives.

It was very clear that there was a growing fatigue with, and an onset of apathy about, messages received by e-mail, with some admitting that they did not have the time to read all advisory messages and may miss some potentially valuable topics or guidance. A separate communication channel may assist in providing a clear voice from the senior command team regarding crime data and expected standards.

Most staff spoke of 'doing the right thing first time' which is an ethos which has been in place and reinforced for over a year. It includes the need for better crime-recording standards and improved quality of data. In some areas there appears to be a robust and transparent checking system for crime recording and investigation by supervisors and line managers. We saw evidence of regular weekly dip-checks made by supervisors on their teams. This in turn appears to be generating a higher level of expectation in standards. Several officers stated that there was an intrusive ethic surrounding crime reports and investigations by supervisors and line managers. None felt that this had a negative impact on their work but rather that it was positive and seen as an accepted process.

Non-adherence to NCRS and the HOCR is considered unacceptable. We found no evidence of performance pressures leading to failures in crime recording, whether through under-reporting or misclassification of crimes.

The PSD delivers presentations on police ethics and integrity to new staff. While the PSD has a number of confidential routes by which staff can voice concerns, we found that officers were not aware that these routes could be used to report concerns about crime data integrity. More could therefore be done by chief officers to promote the reporting routes and to encourage police officers and staff to speak out in the event of concerns with the integrity of crime recording.

The force policy and procedural guidance on crime reporting, management and investigation standards reflects NCRS and HOCR standards and an ethical approach to crime recording, although the need for accurate crime data is not specifically reflected in the policing and crime plan 2013-17.

The central management of CDM has been integral to consistent, impartial crime data integrity.

1.2. How does West Mercia Police ensure that it has a proportionate approach to managing the strategic and organisational risk of recording crime data?

The risks associated with failing to record crime accurately are not recorded and scrutinised through the alliance enabling services risk register; these include failing to provide a truly victim-focused service which then has an impact on victim satisfaction and public confidence as well as lost opportunities for crime pattern analysis and intelligence. This indicates that the force is not appropriately prioritising crime-recording integrity and does not have a developed understanding of the associated risks.

We believe that given the challenges the force is experiencing in terms of NCRS and HOCR compliance, the extensive change programme and a new crime bureau, the force should immediately review its assessment of the risks associated with crime data integrity. It should then ensure that any risks identified are included in, and monitored through, the alliance enabling services risk register with any necessary actions identified to achieve crime data integrity monitored and completed.

For the most part, the force adopts a proportionate approach to the level of detail included in crime reports. Systems exist to ensure the necessary detail on various types and seriousness of crime are recorded properly. The CRIMES system includes an automated investigation plan that guides the user on the volume of text which must be entered and is designed to capture a proportionate amount of information and evidence dependent upon the seriousness of the offence.

Additional data may be entered on a crime report if there are extenuating circumstances such as a vulnerable victim or a prolonged and complicated neighbourhood dispute. In our judgment, the use of CRIMES guides officers on the proportionate level of recorded detail for crime entries.

The force is working hard to ensure that crime and incidents are recorded in accordance with the NCRS, HOCR and NSIR but still has further work to do. The force also uses the CRIMES system to record particular incidents that are not by definition a crime, but that require a police investigation.

The capacity for risk-based audit has been limited. However, within the command and control system, all sexual offence OIS logs opened as crime and closed other than as a crime are subject to daily checks. A daily exceptions report is generated that highlights these cases. The new crime bureau then ensures remedial action is taken to ensure a crime is recorded when appropriate.

1.3. How does West Mercia Police use HOCR, NCRS, and NSIR to ensure there is confidence that crime is recorded accurately?

The force is working hard to ensure that crime and incidents are recorded in accordance with the NCRS, HOCR and NSIR but still has further work to do.

The crime decision makers in the crime bureau review every single crime including a review of OIS and CRIMES to ensure that offences have been correctly recorded. They also review all the outcomes to ensure they comply with NCRS, HOCR and national guidelines.

The weekly force executive board has agreed an audit schedule that will be implemented shortly. In addition, exceptions reports are generated daily and highlight where crimes should have been recorded. These are viewed every day by the sergeants in the crime bureau to ensure that offences are recorded correctly. If a crime should have been recorded but was not, the crime bureau will record and allocate it to the supervisor of the officer concerned. There is more work to be done to develop appropriate performance measures for officers who continually get this process wrong.

All incidents that are created with a 'resolution without deployment' are highlighted to a supervisor to ensure that they are correct. Any missed crime is also identified at this stage.

The CDM review all reports which have been entered into the crime system. They review the classification to ensure it is correct and that an investigation plan is detailed on the record. They also manage the associations between entities to ensure good data quality. After reports are created by 'crime call direct' or telephone investigators they will automatically go to the CDM for review. The CRIMES system holds records for non-notifiable offences such as using violence to secure entry, notifiable crimes and also incident records. Incident records cover vulnerable adults,

domestic abuse and child abuse. DASH¹⁵ forms were also added onto the system from 5 August 2014. During our inspection we noted there were 492 records awaiting review by the CDM but this was not considered excessive.

If the CDM finds an erroneous incident record it is returned to the investigating officer for action. While referred, the record is not yet considered to be a crime and would not form part of a return to the Home Office. It is then for the officer or their sergeant to pass the record back to the CDM. There is no mechanism to chase up those records, so there is the potential if the officer did not update and return the report for it not to be noticed and not shown as a crime.

We were told there is still an 'investigate to record' mindset by some staff in the force for serious offences such as a rape and this can potentially lead to delays or failures to record crime in accordance with NCRS and the HOCR.

There was very limited auditing of incident and crime records that took place other than sexual offences, some robberies and violent offences. There is a reliance on supervisors, managers or crime bureau staff to identify and rectify any crime-recording errors or audit findings.

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 West Mercia Police effectively manage and supervise incidents, other reporting routes and crime records in order to ensure that crimes are correctly recorded?

Force control room supervisors conduct a dip-sampling process to ensure incident record quality.

In general terms, we found that as officers did not feel any performance pressure, when in doubt they recorded a crime. This was the case for both uniform and plain-clothes officers. While this could potentially lead to some over-recording, our audit found this was not the case.

We examined 130 incident records and found that 100 crimes should have been recorded. Of the 100 crimes that should have been recorded, 74 were. Of the 74, three were wrongly classified and one was recorded outside the 72-hour limit allowed under the HOCR. This is of serious concern as it means that some victims' crimes are not being recorded and that these victims are not receiving the service

¹⁵ Domestic Abuse, Stalking, Harassment and Honour-base Violence

they deserve (because, for example, certain victim support services are only triggered once a crime is recorded).

The force also has a centralised crime recording unit. This unit records reports of crime received directly from members of the public which do not require the creation of an incident record. Our review (of 11 records) of this unit found that of the 11 crimes that should have been recorded, all 11 were recorded correctly. The crime bureau is a new alliance-wide model and early signs are that it is likely to provide an effective approach to crime recording for the forces.

There is an alliance crime bureau policy which clearly stipulates that crime will be recorded in accordance with NCRS and the HOCR with incidents recorded in accordance with NSIR. Police Community Support Officers (PCSO) have no involvement in the recording of crime. They do not have any access to the CRIMES system and can only update incident records.

All DASH forms are now entered onto the CRIMES system. This is intended to standardise operational practice, reduce bureaucracy and promote transparency in the way incidents are recorded.

We also examined 50 referrals from police and partners that were recorded on the force CRIMES system as non-crimes, and which were referred to staff from the protecting vulnerable people (PVP) unit. We found that from those 50 reports, 18 crimes should have been recorded. The force had recorded 10 out of the 18 correctly. As some of these records related to sexual offences and assaults on vulnerable adults, this is a significant cause for concern and is a matter of material and urgent importance. The alliance has already addressed this issue and from August 2014, all such incidents should be recorded on the CRIMES system.

Each supervisor in the control room is expected to undertake two hours of auditing per month for every individual member of staff for whom they are responsible. Most supervisors found it more effective to do this while calls are 'live'. Each operator has an individual spreadsheet where the results of the auditing are held. New forms are being prepared for use by Warwickshire Police to add more structure to the reviews. While this involves general checking of the quality of the calls to ensure accurate crime recording and the adoption of a victim-centred approach, the reviews do not directly assess compliance with the NCRS or HOCR.

The alliance crime bureau manages the recording of all reports of crime, either reported directly from the public over the telephone, from officers on patrol using 'crime call direct' or reported at front counters. In April 2014, the CRIMES recording system was adopted within Warwickshire Police which has resulted in an alliance-wide recording and investigation policy.

The force crime screening function is conducted by a number of crime decision makers who operate in isolation from investigating officers and are line managed

within the alliance crime bureau. They are a team, independent of local performance pressures, whose primary aim is to ensure professional, ethical and compliant crime recording.

Based on the final result code and/or certain qualifiers applied to incident logs, exception reports are generated daily when incident logs were opened as crimes but where no crime report has been generated. These are closely monitored by crime bureau supervisors who ensure that crimes are recorded in accordance with NCRS and the HOCR and allocated to the relevant investigating officer.

2.2. How does West Mercia Police ensure that out-of-court disposals suit the needs of victims, offenders and the criminal justice system?

All out-of-court disposals are checked for compliance by the CDM. They will review the disposal history on GENIE and the PNC¹⁶ and ensure compliance with NCRS and the HOCR. There remains room for improvement in the correct application of out-of-court disposals. The magistrates' out-of-court disposal scrutiny panel also reviews some of the outcomes. If an out-of-court disposal is not appropriate, then the detection will be removed from the system and the offender would have that disposal expunged from the PNC provided this is agreed by the data quality panel.

When using out-of-court disposals the force needs to ensure they are applied in accordance with national guidance so that only offenders who are entitled to be offered out-of-court disposals receive them. The current audit regime does not adequately monitor or quality assure out-of-court disposals and supervisors could be more intrusive.

Cautions – Out of the 20 cautions we dip-sampled, we found that in all cases the offender's previous history made them suitable to receive a caution. In 17 cases we found evidence that the offender was made aware of the nature and future implications of accepting the caution. Out of the 15 cases where there was a victim to consult, all showed that the victims' views had been considered.

Penalty Notices for Disorder – We dip-sampled 20 PND and found that the offender was suitable to receive a penalty notice in 12 cases. In 13 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 eight cases where there was a victim to consult, we found that none of the 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 19 cases. In 19 cases we found evidence that that the offender had been made aware of the nature and implications of accepting the warning.

¹⁶ Police National Computer

Community resolutions – We dip-sampled 20 community resolutions and found that in 11 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 20 resolutions where there was a victim, 17 cases showed that the wishes and personal circumstances of the victim had been properly considered. Four cases showed that the agreed outcome was meaningful and appropriate.

The guidance on the use of community resolutions states that the offender should have no relevant offending history; otherwise a supervisor has to be informed, and if the community resolution goes ahead, a record should be made of the reasons for the decision. It was therefore concerning to find that one of the community resolutions which had been used inappropriately involved an offender who had 26 previous convictions and who was given a three-month suspended prison sentence in July 2013, but was issued with a community resolution for shoplifting in November 2014. A second offender had been issued with five community resolutions which were clearly not having the desired effect. Of even more concern were three community resolutions which related to serving prisoners, for burglaries committed as far back as 2002. We also established that over 200 community resolutions had been issued to 15 serving prisoners. These are matters of serious and material concern.

The force had previously discovered this practice itself and the majority of these community resolutions have now been cancelled. However, we still found four inappropriate community resolutions during our audit that had not been cancelled. We are satisfied that this practice no longer takes place.

There was little evidence that the selection and administration of out-of-court disposals was adequately supervised at a local level, and force audits have yet to include this issue as a matter of routine. Notable failings include the lack of consultation and notification of victims of the use of PND as well as the inappropriate use of both PND and community resolutions.

All staff spoken to agreed that the victim contract contact is very important and while they would always seek the victim’s view, and where possible mould their response to fit that view, on occasion (e.g. domestic cases) they may go against that view. All staff confirmed that they would speak with the victim and give advice on why this had happened and notify them of the intended outcome.

Specialists from the protecting vulnerable people (PVP) unit told us that because the victims of offences they investigated varied hugely in their levels of understanding, where a victim could make informed comment, views were sought and acted upon. However, if the victim was of such an age or mental state that they could not make an informed comment, specialists would make an objective decision based on what they thought was best for the victim.

2.3. Are no-crime decisions for high-risk crime categories correct and is there robust oversight and quality control in West Mercia Police?

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. The decision to no-crime offences including rape, violent crime and making off without payment is made by officers who work in a centralised support unit. We examined 77 no-crime records and found 66 records to be compliant with HOCA and NCRS. This is a concern as the no-crime decisions we reviewed related to offences of rape, robbery and violence.

The accuracy of no-crime decision making is not routinely monitored by the FCR who should have closer personal scrutiny of no-crime decisions, especially for serious sexual offences such as rape.

There are bespoke templates on the crime recording system for no-crime, reclassification, offences taken into consideration and out-of-force detections. If an investigating officer wants to record a no-crime, it needs to be approved first by their sergeant who completes a template detailing the additional verifiable information. The request is then forwarded to the CDM who are the only people who can make the no-crime decision. If the DDM does not agree with the request, they will return the crime report with justification and the FCR will only deal with disputes as the final arbiter. The FCR routinely monitors no-crimes and where necessary, engages senior detectives and CDM to give advice on no-crime. The role of CDM is not connected to the performance regime and is independent of local investigations and performance requirements.

2.4. How does West Mercia Police promote a victim-centred approach to crime recording and associated outcomes?

We found frontline staff, including call-takers, understood the importance of meeting the needs of the victim when considering crime recording and investigation – they are polite, professional and helpful.

Chief officers advocate a victim-centred approach to crime recording, crime outcomes and no-crime. In recently prepared guidance to DDM on recording violence with injury and making off without payment offences, the importance of a victim-focused approach is reinforced.

The alliance crime bureau policy clearly stipulates that crime will be recorded in accordance with NCRS and the HOCA and that incidents will be recorded in accordance with NSIR.

The CRIMES system ensures victim contact is considered through automated victim contracts, and officer reminder e-mails are sent out prior to the contact date to ensure that the agreed contact with the victim is maintained. We found an intrusive review process by supervisors in place to ensure that victim contact and other investigation milestones are met. Victim aftercare appears to be directed by professional experience and management guidance.

We found frontline staff, including call-takers, understood the importance of meeting the needs of the victim when considering crime recording and investigation; they are polite, professional and helpful.

Customer satisfaction surveys are conducted by both forces within the alliance but these surveys are generic in respect of overall satisfaction, trust and confidence and do not have a specific focus on crime recording. Any themes arising from the surveys are presented to performance meetings.

Managers within the crime bureau receive approximately 15 dissatisfied and 5 satisfied victim satisfaction records to review each month. Themes are identified and rectified through training or using the monthly bulletin. If appropriate, the crime bureau manager will re-contact victims to answer queries and aid service recovery. A recent example was given of a victim who was dissatisfied owing to a perceived lack of investigation into his crime report. When the crime record was reviewed there were a number of investigative actions that had taken place of which the victim was unaware. The victim was updated, the officer received advice and the message on keeping victims informed was reiterated through further guidance issued to staff.

2.5. How does West Mercia Police ensure systems for receiving, recording and managing reported crimes of rape are robust?

Current force guidance specifies at what point in time a rape should be recorded as a crime. The FCR scrutinises all recorded sexual offences to ensure they have been correctly recorded and classified against NCRS and the HOCA.

Although the FCR has ultimate responsibility for no-crime authorisations, the structure of the Crime Bureau is such that for day to day requests to authorise a submission of no-crime for rape the CDM within the crime bureau are authorised to make all such decisions. We examined 30 rape no-crime records and found that 25 complied with NCRS and the HOCA.

The force guidance includes instruction on how to deal with rapes that have been reported to the force but committed in another force area. However, knowledge of the guidance is variable among staff. In most instances, officers receiving reports of rape and other sexual offences had promptly taken responsibility and ensured a crime was recorded and that the victim received the appropriate care.

2.6. How do West Mercia Police IT systems allow for efficient and effective management of crime recording?

The force computer systems for incidents, OIS and the crime recording system, CRIMES are linked but the transfer of information is limited only to the location of the crime. A list of potential crime reports is created in CRIMES and the unique reference number of each crime linked back to the OIS system. Both of the systems are well managed but would benefit from increased audit and information weeding. The intelligence system, GENIE offers a searchable solution that stores data from both OIS and CRIMES.

The two alliance forces are merging their data onto the West Mercia system and back record conversion of Warwickshire's data is ongoing. We were told of some problems with duplicate nominals and locations which the alliance is trying to resolve. To mitigate mistakes, a limited number of people have access to systems to change information. If errors in data are identified a request is sent out to a virtual group that forms a data quality panel chaired by the information compliance officer and including the crime bureau manager and the FCR.

There are clear instructions to officers and staff to use only the systems prescribed by the force. We found no evidence to indicate the presence of any unauthorised local databases.

A new single incident and crime management IT system serving both forces in the alliance is being considered for the future. This is some way off and no definitive decision has been made yet on which system to procure. Attention will need to be paid to maintaining full compliance with all crime recording requirements as this new system is implemented.

People and skills

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

3.1. What arrangements does West Mercia Police have in place to ensure that staff have the necessary skills to ensure accurate crime recording?

Staff and supervisors responsible for managing crime, out-of-court disposals and no-crime, and those working in specialist departments were generally found to have an appropriate knowledge of NCRS and HOCR although levels of understanding varied.

The vast majority of staff spoken to during the inspection were well motivated and there was acknowledgement of the importance of integrity in crime recording. This was hampered by a lack of understanding by some about NCRS and the HOCR which caused them some frustration. Call-takers handle contact with the public in a professional, courteous and polite manner.

Most staff, including those using mobile data terminals, stated they had received limited training, mostly consisting of how to use the devices as opposed to guidance on crime recording or alliance policies and procedures. Frontline officers and staff have not received structured training on NCRS or the HOCR, although guidance is accessible from the force intranet. There is a need for NCRS and HOCR training across the alliance for frontline officers including specialists from the PVP unit.

There are no standard operating procedures (SOP) for harm assessment within the public protection units; staff there appear to work in silos with little corporacy. It is clear that many specialist staff in a number of areas have not always recognised the importance of accurate crime recording and have elevated other outcomes, such as safeguarding and not criminalising the young and the vulnerable, over crime recording that is compliant with NCRS and the HOCR. Their knowledge of national guidance on crime and incident recording practice varied. Staff told us they have had very little training to prepare them for their roles including how to complete risk assessments.

3.2. How do the behaviours of West Mercia Police staff reflect a culture of integrity for crime recording practice and decision-making?

The vast majority of staff we spoke to during the inspection were well motivated and enjoyed working for West Mercia Police. Staff generally understand what is expected of them and strive to act professionally and with integrity; they also know the standards that must be achieved in relation to crime recording. Non-adherence to NCRS and the HOCR is considered unacceptable at all levels of the force and senior managers described being given a clear mandate to record crime ethically.

There is no evidence to indicate that any failure to record crime against NCRS and the HOCR at the user level is driven by performance pressures. Any failures are more a consequence of misunderstanding NCRS and the HOCR both by frontline officers and staff at the point of incident closure.

Staff told us they receive support from their supervisors and managers to record crime accurately. There was no suggestion from any of the interviewees that they had experienced any pressure to under-record, over-record or mis-record any crimes. Frontline staff from both CID and those in uniform indicated that each crime was reviewed by the CDM and crime bureau to ensure that all relevant initial information was captured with failures to provide information by the end of the shift resulting in the crime report being flagged on an exceptions list. This list is reviewed by supervisors and force management who will question the delay around the entry of information.

In addition, there was an 'intrusive supervisor' policy in relation to officers' crime workloads. This review policy ensures attention to detail and compliance with any review or investigation milestone. All staff accepted this intrusive policy and the majority believed it was the right thing to do as it provides a means by which supervisors and managers can provide support. It also enables greater scrutiny and, ultimately, greater accuracy of the crime data submitted.

3.3. How is the accuracy of crime recording in West Mercia Police actively overseen and governed by the force crime registrar (FCR)?

The role of FCR is to act as the force conscience and the importance of a visible and active FCR cannot be overstated. The alliance currently relies upon one FCR across both areas with no deputy. It is challenging for one person to be sufficiently visible and effective across two forces and the FCR role profile is currently under review. As part of this review, due consideration should be given to providing increased resilience to the FCR role to enable it to be fulfilled effectively across the alliance.

The FCR should be independent and have a direct link to chief officers; the postholder currently reports to the continuous improvement manager. The lack of a direct line management link with a chief officer could weaken the ability of the FCR to exert authority and maximise compliance with NCRS and the HO CR.

We found that owing to limited resources, the FCR is only partially active in her oversight of crime-recording systems and processes within the alliance and yet she has specific responsibility for ensuring NCRS and the HO CR are consistently applied. Improved capacity would allow the FCR to spend more time on audit and quality assuring crime recording.

Ultimately, all crime-recording disputes are appropriately referred to the FCR who is seen as the final arbiter although in practice, such matters would first be referred to the crime bureau before the FCR. There are very few challenges and it is very rare for a decision made by the bureau to be reversed.

Force policies on crime recording are compliant with NCRS and the HO CR and are overseen and endorsed by the FCR.