

# Crime data integrity

## Inspection of West Yorkshire Police

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## Introduction

In its 2013/14 inspection programme<sup>1</sup>, 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<sup>2</sup> 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”*.<sup>3</sup>

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](http://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)<sup>4</sup> and Home Office Counting Rules (HOCR)<sup>5</sup>.

<sup>1</sup> The 2013/14 inspection programme was approved by the Home Secretary under section 54 of the Police Act 1996.

<sup>2</sup> 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.

<sup>3</sup> *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.

<sup>4</sup> 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.

<sup>5</sup> 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 promote the importance of crime data integrity throughout the force. The deputy chief constable is the named, responsible officer for crime data quality.

The force maintains policies and procedures on crime reporting, crime management and criminal investigations which meet the requirement of the NCRS and HOCR, and which are reviewed and kept up to date. The 2014 refresh of the *West Yorkshire Police and Crime Plan* makes specific reference to the need for accurate crime data.

The force has a framework for monitoring crime data integrity performance; however, this is at an early stage of development. The deputy chief constable chairs local accountability meetings on each of the operational policing districts on a monthly basis. The minutes of these meetings show that crime data integrity considerations are discussed.

**Recommendation:** Within three months, the force should introduce NCRS compliance performance across the whole of its governance structure and should use this to underwrite crime performance achievements.

The force crime and incident registrar<sup>6</sup> (FCIR) maintains an intranet site which provides information about key recording issues and which also has a hyperlink to an anonymous confidential reporting line.

The threat to quality of service arising from inaccurate data recording is clearly understood by the force, and crime data integrity is recorded and graded as red on the force risk register. The force has carried out an extensive-process mapping exercise of the routes by which crime is recorded; however the process map has not yet been developed to the extent that each stage is risk assessed and individual vulnerabilities are mapped.

West Yorkshire Police maintains a flexible audit plan; however this audit regime is a recent enhancement. Until mid 2013 the audit function was low key and

<sup>6</sup> 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.

there was little in the way of organisational understanding or learning about crime recording accuracy. The audit plan that is now in place is to be supported by a new team of internal auditors to ensure that work is done consistently to the required standard.

**Recommendation:** Within three months, the force should ensure that the resources available to the FCR are sufficient to enable the FCIR to fulfil an effective audit regime to monitor and improve compliance with the HOOCR and NCRS.

## Systems and processes

### Accuracy of crime recording

We examined 260 incident records<sup>7</sup> and found that 221 crimes should have been recorded. Of the 221 crimes that should have been recorded, 150 were. Of the 150, 11 were wrongly classified and 5 were recorded outside the 72-hour limit allowed under the HOOCR. Improvement in the accuracy and timeliness of crime recording decisions from incident records is needed as a matter of urgency to ensure victims receive the service they require, the force has a full understanding of the crime in its communities and offenders are brought to justice.

There is no clear management oversight of the whole incident recording process from the initial report through to the decision to finalise the incident record, including the decision to allocate a crime closing code or not. We specifically looked at 55 incident records, which had been closed with a 'concern for safety' non-crime code. We found that in five cases, a crime record should have been created and none was.

**Recommendation:** Immediately, the force should introduce a consistent and structured approach to call-handling quality assurance processes, this should include listening to audio records to assess the accuracy of incident recording and have compliance with NCRS at its core, with particular attention given to those offences which are of greater risk to public safety.

The force has a centralised crime recording facility involving members of staff at the customer contact centre who have a supplementary role in recording some crime reports. We have estimated that the force records approximately 13 per cent of the total of its recorded crime through this facility where reports of crime

<sup>7</sup> 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.

are directly recorded from members of the public and do not require the creation of an incident record. Our inspection of this unit (a review of 33 calls from the public) found that of the 36 crimes that should have been recorded, 34 were. Of the 34, two were wrongly classified and one was recorded outside the 72-hour limit allowed under the HOCR.

We examined 108 reports that were referred from other agencies directly to the force's safeguarding units (public protection). Of the 27 crimes that should have been recorded, 3 had been. Of the 3, all were correctly classified and one was recorded outside 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 serious cause for concern and is a matter of material and urgent importance.

**Recommendation:** Within three months, the force should establish and, as soon as practicable thereafter, begin operation of an adequate system for the auditing by the FCIR of all computer systems which are in use by the safeguarding teams which may contain reports of crime, with special attention being directed to those reports involving vulnerable adults and children.

Many incidents are recorded by the customer contact centre but are then passed to one of the five district control rooms which then deploy resources to the incident. The incident is, in these instances, closed by the district control room. We found inconsistencies in the district control rooms due to resource-management problems and low levels of understanding of the NCRS and HOCR (see Recommendation 10 below).

We found evidence in some parts of the force of an, investigate-to-record ethos in cases involving priority crime. In such cases, the decision to record a crime was not made until an initial investigation had taken place and the circumstances reported to a local supervisor or investigator who reviews, and effectively authorises, the recording of certain crime types. This approach is in direct contravention of the NCRS, demonstrates a failure to put the victim at the heart of decision-making and gives rise to the potential for local performance pressures to affect the integrity of crime-recording decisions.

**Recommendation:** The force should take immediate steps to communicate to all staff that an ethical approach to crime recording, done in accordance with the HOCR and NCRS, is expected and that crime-recording decisions should not be based on local performance concerns, undertaken through an investigate-to-record approach or subject to approval by a local supervisor or investigator; and any such processes that are in place should stop immediately.

## Out-of-court disposals

Out-of-court disposals include cautions, Penalty Notices for Disorder (PND),<sup>8</sup> cannabis warnings<sup>9</sup> and community resolutions.<sup>10</sup> The HOCR (section H) states that national guidance must be followed<sup>11</sup>.

**Cautions** – Out of the 20 cautions we dip-sampled, we found that in 20 cases the offender's previous history made them suitable to receive a caution. In 11 cases we found evidence that the offender was made aware of the nature and future implications of accepting the caution. Out of the 11 cases where there was a victim to consult 5 cases 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 16 cases. In 16 of the 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 seven cases, where there was a victim to consult, we found no record in any of the seven cases that the victim's had their views considered when the police decided to issue a penalty notice.

**Cannabis warnings** – We dip-sampled 25 cannabis warnings and found that the offender was suitable to receive a warning in 15 cases. In none of the 25 cases could we find evidence that that the offender had been made aware of the nature and implications of accepting the warning.

**Community resolutions** – We took a dip-sample of 20 community resolutions and found that in 16 cases the offender either had no previous offending history or that the offender's past history still justified the use of the community

<sup>8</sup> 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.

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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](http://www.xact.org.uk)
- *Simple Cautions for Adult Offenders*, 14 November 2013. Available from [www.justice.gov.uk](http://www.justice.gov.uk)
- *Code of Practice for Adult Conditional Cautions*, 8 April 2000. Available from [www.justice.gov.uk](http://www.justice.gov.uk)
- *Home Office Police Operational Guidance for Penalty Notices for Disorder*, March 2005. Available from [www.justice.gov.uk](http://www.justice.gov.uk)
- *ACPO Guidance on Cannabis Possession for Personal Use*, 28 January 2009. Available from [www.acpo.police.uk](http://www.acpo.police.uk)

resolution. Out of the 20 resolutions where there was a victim, 19 cases showed that the wishes and personal circumstances of the victim had been properly considered. 11 cases showed that the agreed outcome was meaningful and appropriate<sup>12</sup>.

Our dip-sampling indicates good compliance with national standards; however it is evident from our inspection that out-of-court disposals are being used too often when the offender is not suitable for the disposal, and in respect of cautions and penalty notices for disorder, without due consideration to the views of the victim.

The West Yorkshire Police criminal justice department dip-samples out-of-court disposals however, this sampling is not coordinated with the audit programme managed by the FCIR, and they are undermined as the evaluators do not have access to national systems to carry out checks and they are not empowered to rectify errors.

**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 the monitoring of the use of out-of-court disposals to ensure the decisions being taken to use the disposals are appropriate.

## **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. We examined 105 no-crime records and found 65 records to be compliant with HOCR and NCRS. As the no-crime records we reviewed were for offences of rape, robbery and violence, this high error rate is a matter of serious concern.

The force has a number of designated decision makers (DDM) whose role it is to decide if a crime is suitable for a no-crime process. These DDM are detective inspectors working on policing districts who also have responsibility for performance. This is not a suitable framework as the DDM are not independent from the performance regime.

<sup>12</sup> 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.

**Recommendation:** Immediately, the force should review the current structure for the approval of no-crime decisions, ensuring these decisions are made by individuals who are independent of local performance accountability and supported by effective and proportionate oversight by the FCIR.

### **Victim-centred approach**

Chief officers have reinforced the victim-centred approach to crime recording, and have invested in processes to monitor and manage victim care, including training for constables and frontline supervisors. However the force has some way to go before it can claim that crime is recorded consistently and accurately, thereby ensuring the right level of victim support. Actions carried out in line with the Victims' Code of Practice are not always recorded.

The office of the police and crime commissioner routinely carried out satisfaction surveys. However there is no corporate framework for dip-sampling service users, either routinely or in a systematic way, which specifically informs the force of customer issues with the recording processes. Neither is there a profile of the crime reporting characteristics of the diverse range of communities who live and work in the force area. Without these in place it is difficult to see how the force will achieve its objective to secure a victim-centred approach to crime recording.

Some customer satisfaction data, feedback and complaints are gathered by the Home Office sponsored survey process and these are fed back into the force performance improvement framework; however these data are not used to inform information management and process improvement.

**Recommendation:** Within three months, the force should complete a gap-analysis to aid its understanding of what is required by its communities to ensure its structures, systems and processes are able to support the provision of a victim-centred approach for all victims and, as soon as practicable thereafter, and to the greatest extent economically feasible, make the necessary changes identified through this analysis.

### **Rape offences**

The force has a serious sexual offences policy that clearly describes when and how reports of rape should be recorded. The force has recently amended the procedures for recording rape incidents in an attempt to remove a culture of investigate-to-record; the force was holding some reports under an incident category called 'potential sexual incident' which led to delays in recording rape crimes. The removal of this category is a recent development and the impact on decision-making is yet to be evaluated.

Comprehensive sampling, monitoring and auditing of serious sexual offences takes place on a monthly basis and a team of auditors has been established within the information management unit to carry out this work. Further

arrangements have recently been introduced for dynamic monitoring of reports of rape within the customer contact centre. There is a good network of sexual offence-trained officers across the force available around the clock which aids early assessment and accurate recording.

The force rape policy describes how to deal with rape no-crime decisions; however this is not widely understood or correctly applied. The policy refers to a process where no-crime decisions for offences of rape are submitted to the FCIR for finalisation. We found little evidence of this process and, in reality, rape no-crime decisions are made by district-based detective inspectors. Of the 35 rape no-crime records we examined, 23 met the requirements of the HOCR. This is unacceptable.

**Recommendation:** Immediately, the force should begin the operation of an adequate system for the auditing by the FCIR of rape no-crimes to ensure they are compliant with the HOCR and NCRS, and the results of this audit should be reported into the force performance meetings.

## **IT systems**

West Yorkshire Police has two main systems to record incidents (STORM) and crime (NICHE) and these systems are linked. The force has created the information management department in response to a recognised need to understand its IT systems and to manage better data quality and accuracy; consequently significant work has been done to map systems and understand crime data integrity vulnerability and threats to accurate recording.

The force is trying to balance crime data integrity and data quality considerations. Automatic transfer of information without human screening has led to large numbers of duplicate nominal records and addresses in its systems. The force is investing in technology, which will help to manage the data quality risk and these developments are aimed at improving the ability to identify repeat victims reliably and increase the confidence with which data can automatically be transferred.

## **People and skills**

Our inspection revealed a low level of understanding of the HOCR and NCRS among members of staff. We found evidence of non-compliance with the standards based upon this low level of understanding. The presence of alcohol or mental health issues with the victim, the victim's refusal to support a prosecution and Crown Prosecution Service charging standards being used to influence crime-recording decisions were all found to be inappropriately affecting crime recording accuracy.

**Recommendation:** Within three 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 required to make crime recording decisions, and ensure those who require such training receive it as soon as reasonably practicable.

Senior managers are encouraged to secure accurate crime recording and we did not find evidence of any pressure to under-record or otherwise record crime inaccurately, or in anyway work outside the NCRS in respect of outcomes. The consistent message from senior managers during our inspection was that the ethical recording message was very clear.

However, recognition of chief officers' messages concerning crime data integrity is inconsistent below the level of senior managers and there are some areas of the force where the message has yet to penetrate. Non-adherence to HOCR is considered to be acceptable by some officers in circumstances where it is perceived that there is too much work and insufficient members of staff to deal with the crime. The force needs to be confident that the corporate accountability framework leaves leaders at all levels in no doubt where their responsibilities lie in relation to crime data integrity, and that it delivers high standards of operational performance in conjunction with accurate crime recording.

### **Force crime and incident registrar**

The FCIR role has been greatly enhanced by the force. It has been integrated within the information management department and resources have been put in place for risk-based auditing alongside the FCIR.

The FCIR has the full support of, and access to, the chief officer with lead responsibility for crime data quality.

The FCIR is able to act objectively and impartially to ensure the force records crime correctly, including responsibility for the development, implementation and monitoring of crime recording and outcome policies and subsequent audit programmes to ensure high standards of data integrity.

Crime-recording disputes are suitably dealt with by local supervisors, crime evaluators, designated decision-makers and, in some cases, district based crime managers. Some crime-recording disputes are suitably referred to the FCIR but not in every case.

# Recommendations

## Immediately

1. The force should introduce a consistent and structured approach to call-handling quality assurance processes; this should include listening to audio records to assess the accuracy of incident recording and have compliance with NCRS is at its core, with particular attention given to those offences which are of greater risk to public safety.
2. The force should communicate to all staff that an ethical approach to crime recording, done in accordance with the HOCR and NCRS, is expected and that crime-recording decisions should not be based on local performance concerns, undertaken through an investigate-to-record approach or subject to approval by a local supervisor or investigator; and any such processes that are in place should stop immediately.
3. The force should 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 the monitoring of the use of out-of-court disposals to ensure the decisions being taken to use the disposals are appropriate.
4. The force should review the current structure for the approval of no-crime decisions, ensuring these decisions are made by individuals who are independent of local performance accountability and supported by effective and proportionate oversight by the FCIR.
5. The force should begin the operation of an adequate system for the auditing by the FCIR of rape no-crimes to ensure they are compliant with the HOCR and NCRS, and the results of this audit should be reported into the force performance meetings.

## Within three months

6. The force should introduce NCRS compliance performance across the whole of its governance structure and should use this to underwrite crime performance achievements.
7. The force should ensure that the resources available to the FCIR are sufficient to enable the FCIR to fulfil an effective audit regime to monitor and improve compliance with the HOCR and NCRS.

8. The force should establish and, as soon as practicable thereafter, begin operation of an adequate system for the auditing by the FCIR of all computer systems which are in use by the safeguarding teams which may contain reports of crime, with special attention being directed to those reports involving vulnerable adults and children.
9. The force should complete a gap-analysis to aid its understanding of what is required by its communities to ensure its structures, systems and processes are able to support the provision of a victim-centred approach for all victims and, as soon as practicable thereafter, and to the greatest extent economically feasible, make the necessary changes identified through this analysis.
10. 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 required to make crime recording decisions, and ensure those who require such training receive it as soon as reasonably practicable.

## 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.

<b>Crimes reported as part of an incident record</b>		
<b>Incidents reviewed</b>	<b>Crimes identified</b>	<b>Crimes recorded</b>
HMIC reviewed the following number of incident records in WYP. 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 WYP recorded the following number of crimes.
<b>260</b>	<b>221</b>	<b>150</b>
<b>Crimes reported directly from the victim</b>		
HMIC reviewed the following number of reports of crimes that were reported directly by telephone to the WYP 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 WYP should have recorded.	From these identified crimes WYP recorded the following number of crimes.
<b>33</b>	<b>36</b>	<b>34</b>
<b>Crimes referred from other agencies directly to WYP specialist departments</b>		
<b>Referrals</b>	<b>Crimes identified</b>	<b>Crimes recorded</b>
HMIC reviewed the following number of referrals reported directly to WYP specialist departments from other agencies, which contained reports of crime.	From these referrals to specialist departments HMIC identified the following number of crimes that WYP should have recorded	From these identified crimes WYP recorded the following number of crimes.
<b>108</b>	<b>27</b>	<b>3</b>
<b>No-crimes</b>		
HMIC reviewed the following number of recorded crimes of rape, violence and robbery, which WYP had subsequently recorded as no-crime.	From these HMIC assessed the following number of no-crime decisions as being correct.	
<b>105</b>	<b>65</b>	

## 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 Yorkshire Police ensuring that leadership responsibilities and expectations for crime data integrity are clearly defined and unambiguously communicated to staff?**

The deputy chief constable (DCC) has responsibility for performance and also crime data integrity. The DCC has responsibility for managing the accountability or performance-management processes. There are currently four assistant chief constables and an assistant chief officer, all of whom have more specific performance management responsibilities. The DCC is the chief officer lead for crime data integrity and the senior information risk-owner for the programme of change aimed at improvement in this area. At the time of our inspection, the DCC had been in post for four months and there was some way to go before she can demonstrate an improvement in crime recording standards; however clarity, purpose and a sense of direction have been brought to the situation with the aim of establishing local control with independent evaluation and quality assurance.

The information management board and programme are building enhanced local accountability processes and linking into the quarterly strategic review of threat risk and harm. Governance is provided in the form of a structured programme overseen by a board chaired by the DCC and a management board chaired by the head of the information management department. The work of this programme links to the corporate risk register where crime data integrity has been identified as a red risk.

Chief officers clearly communicate an approach to crime recording which is about empowering people to make the right decisions and getting it right first time, ensuring that the force delivers a victim-focused service with integrity, openness and transparency. The DCC leads on this communication, using video presentations amongst other communication routes. The DCC chairs district-based local accountability meetings (LAMs) and there is evidence that the agenda for these meetings is risk-based, linked to the force accountability meeting and that crime data integrity has a high profile within the meeting. Our inspection found that the ethical recording message has been received by

senior managers; however frontline staff do not consistently understand crime recording rules and standards. Performance pressure can sometimes prevail over integrity of crime recording.

The DCC's video message to the force on crime data integrity encouraged members of staff who have concerns about crime recording to communicate through the confidential reporting line to the professional standards department (PSD). The force has a generic confidential reporting line (e-mail) direct to the PSD. This is used to report officer concerns about anything. It is well-publicised and well-known throughout the force. In addition, a video message from the force crime and incident registrar (FCIR) reinforced the DCC's message and informed members of staff that they can also use the FCIR e-mail inbox to register concerns. There is evidence that this facility has been used and that issues were dealt with positively by the force. The FCIR maintains an intranet site, which provides information about the main recording issues and also a hyperlink to the confidential reporting line.

Crime data integrity has been identified as a red risk for the force; the agendas for key accountability meetings are risk-based, and therefore current issues feature in discussions involving chief and senior officers.

West Yorkshire Police has a policy on crime recording. This document and other policies and strategies relating to crime recording provide a succinct and unambiguous direction for ethical crime recording. Relevant policies are being reviewed under the information management programme and this includes those which relate to areas where there is a risk of poor quality of service to vulnerable victims such as the investigation of serious sexual offences, safeguarding vulnerable adults and safeguarding vulnerable children. The force policy on crime recording and finalisation states that the force is committed to the accurate and ethical recording of crime in compliance with the NCRS and HOCR.

The 2014 refresh of the *West Yorkshire Police and Crime Plan* makes specific reference to the need for accurate crime data.

*"It is important that crime is recorded in a way that is accurate and ethical. Data on recorded crime is often used to assess the impact of action and initiatives undertaken not just by the police but also by wider community safety and criminal justice partners. I use them to hold the Chief Constable to account"*

The police and crime commissioner also states in the plan that he will continue to seek assurances from the Chief Constable that the public of West Yorkshire can rely on the numbers they quote.

## **1.2 How does West Yorkshire Police ensure it has a proportionate approach to managing the strategic and organisational risk of recording crime data?**

The force has carried out an extensive process-mapping exercise of the routes through which a report from a member of the public or a police officer can travel on its way to being recorded. The proportions of total crime reported through each route is understood and a framework of crime evaluators is in place to check crime recording quality. However, at the time of our inspection, measures were not in place to ensure the proper conversion of incident to crime records and this is a gap. The force has continuing problems with an inconsistent level of understanding of the NCRS and HOCR among frontline supervisors.

The force has made an assessment of some main crime categories and has some understanding of its recording risks in those areas. The capacity to audit to a level required to provide the force with the necessary assurance is an issue. Auditing is based on the primary recording risks as they are understood; this incorporates an assessment of victim impact. Mitigating actions are being put into place through the force risk-management framework.

The force mostly adopts a proportionate approach to the level of detail included in crime records and a minimum standard is required in order that an appropriate assessment can be made of the information for classification and quality of service purposes. More is recorded in circumstances where there is a higher risk. However, our audit revealed inconsistencies and that the level of detail captured on occasion was insufficient to support proper classification, resource allocation and auditing.

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

West Yorkshire Police has recently invested in processes to improve crime recording accuracy; a central audit team is now in place and the position of the FCIR has been strengthened. Until mid 2013 the audit function was low key and there was little in the way of organisational understanding or learning about crime recording accuracy. An audit plan is now in place and a new team of internal auditors is being established to ensure that work is completed consistently and to the required standard.

The audit plan incorporates capacity to audit emerging issues quickly; however, the arrangements in place are at an early stage of development. Daily monitoring takes place of high-risk crime categories such as serious sexual offences and burglary.

Local accountability meetings are beginning to take into account the findings from audits in the performance-management process, and the agendas are based on risk-management. Individual issues which arise from audits are referred back directly to the districts whilst thematic issues are taken to the LAM. These meetings are at an early stage of development; however our review of minutes of meetings shows that performance issues, including crime data integrity considerations, are discussed.

Recording errors found as a result of the audit process are referred back to district crime managers who should then report back to the audit team following rectification. The force acknowledges that in the past there was a heavy reliance on the districts to resolve these issues in isolation from the centre. The force performance improvement unit is being developed to carry out reality testing in the districts to ensure that corrective action is actually taking place.

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

We examined 260 incident records and found that 221 crimes should have been recorded. Of the 221 crimes that should have been recorded, 150 were. Of the 150, 11 were wrongly classified and 5 were recorded outside the 72-hour limit allowed under the HOCR. Improvement in the accuracy and timeliness of crime-recording decisions from incident records is needed, as a matter of urgency, to ensure victims receive the service they require, the force has a full understanding of the crime in its communities and offenders are brought to justice.

Our inspection of 33 calls reported directly by telephone to the crime-recorders in the customer contact centre found that of the 36 crimes that should have been recorded, 34 were. Of the 34, two were wrongly classified and one was recorded outside the 72-hour limit allowed under the HOCR.

We examined 108 reports that were referred from other agencies directly to the force's safeguarding units. Of the 27 crimes that should have been recorded, 3 had been. Of the 3, all were correctly classified and 1 was recorded outside the 72-hour limit allowed under the HOCR.

There is no clear management oversight of the whole incident recording process from the initial report through to the decision to finalise the incident record, including the decision to allocate a crime closing code or not. We looked specifically at 55 incident records which had been closed with a 'concern for safety' non-crime code. We found that in five cases a crime record should have been created and none was.

Many incidents are recorded by the customer contact centre but are then passed to one of the five district control rooms which then deploy resources to the incident. The incident is, in these instances, closed by the district control room. We found inconsistencies in the district control rooms owing to resource

management problems and low levels of understanding of the NCRS and HOCR.

We found evidence in some parts of the force of an, 'investigate-to-record' ethos in cases involving priority crime. In such cases the decision to record a crime was not made until an initial investigation had taken place and the circumstances reported to a local supervisor or investigator who reviews, and effectively authorises, the recording of certain crime types. This approach is in direct contravention of the NCRS, demonstrates a failure to put the victim at the heart of the decision-making and gives rise to the potential for local performance pressures to affect the integrity of crime recording decisions.

There are quality assurance processes in place; however we found adherence to these inconsistent and they did not adequately cover the range of reporting routes through the organisation. Crime evaluators based on local policing districts each day review recorded crime for errors in classification, referring those found back to the reporting officers via their supervisor for action to resolve the issue. However our dip-sample of criminal damage records found that there was a high proportion of classification errors, which suggests that the quality assurance system was not reliable. Nine records were examined where the incident had been opened on a burglary code and finalised as a crime of criminal damage to a dwelling. Of these, seven records were found not to be compliant with the NCRS. In addition, a further ten incidents were checked which were opened with a burglary code and finalised as suspicious circumstances; of these, five records had insufficient rationale to justify a failure to record a crime as per the HOCR.

The force crime recording policy details how officers and staff should deal with reports of crime which have occurred in another force area but it does not include details for managing the transfer of documentation to the relevant force.

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

When using 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** – Out of the 20 cautions we dip-sampled we found that in 20 cases the offender's previous history made them suitable to receive a caution. In 11 cases we found evidence that the offender was made aware of the nature and future implications of accepting the caution. Out of the 11 cases where there was a victim to consult, 5 cases showed that the victim's 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 16 cases. In 16 of the 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 seven cases where there was a victim to consult, we found no record in any of the seven cases that the victims had their views considered when the police decided to issue a penalty notice.

**Cannabis warnings** – We dip-sampled 25 cannabis warnings and found that the offender was suitable to receive a warning in 15 cases. In none of the 25 cases could we find evidence that that the offender had been made aware of the nature and implications of accepting the warning.

**Community resolutions** – We took a dip-sample of 20 community resolutions and found that in 16 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, 19 cases showed that the wishes and personal circumstances of the victim had been properly considered. 11 cases showed that the agreed outcome was meaningful and appropriate.

The West Yorkshire Police criminal justice department dip-samples out-of-court disposals and the results are shared with the FCIR; however, this sampling is not coordinated with the audit programme. There are processes for local monitoring by crime evaluators; however, the effectiveness of this work is undermined as the evaluators do not have access to national systems to check the correct use of the disposal and they are not empowered to remove from the system those alternative disposals which have been issued inappropriately.

### **2.3 Are no-crime decisions for high-risk crime categories correct, and is there robust oversight and quality control in West Yorkshire 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. We examined 105 no-crime records and found 65 records to be compliant with HOCR and NCRS. As the no-crime records we reviewed were for offences of rape, robbery and violence this high error rate is a matter of serious concern.

The appropriate use of additional verifiable information in arriving at decisions to no-crime isn’t clearly understood or applied by members of staff in general. Consideration is rarely given to reclassifying the record as an appropriate course of action. There are cases where the victim’s version of events is not believed, and in some instances the suspect’s account is used to negate that of the victim.

Monitoring the accuracy of no-crime decisions is a problem for the force. Designated decision-makers (DDM) have local responsibility for confirming no-crime decisions. The DDM role is fulfilled by detective inspectors working in the policing districts who also have responsibility for performance. The force is to undertake a review of the crime recording decision-making process and the role of the DDM. The force understands that separation needs to take place between performance and compliance management and that there are too many DDM, there are also issues with line management; and decision-making by the DDM is inconsistent.

#### **2.4 How does West Yorkshire Police promote a victim-centred approach to crime recording and associated outcomes?**

Chief officers have reinforced the victim-centred approach to crime recording, and policy documents and strategies reflect this. The force has invested in processes to monitor and manage victim care and training for constables and frontline supervisors. However the force has some way to go before it can claim that crime is recorded consistently and accurately, thereby ensuring the right level of victim support. Actions carried out in line with the Victims' Code of Practice are not always recorded.

There are areas within the force where the victim-centred approach is very strong. Safeguarding units routinely provide very good levels of victim support in partnership with other agencies. We listened to 257 calls from members of the public and in all but 10 cases' the call handlers were very polite, professional and helpful. The force is to introduce a new model for risk-assessment and decision-making around victim needs. Nevertheless there are still a significant number of recording decisions made which are more about deployment practices and police process-management than the genuine needs of victims.

The office of the police and crime commissioner routinely carries out satisfaction surveys. However there is no corporate framework for dip-sampling service users, either routinely or in a systematic way, which specifically informs the force of customer issues with the recording processes. Neither is there a profile of the crime-reporting characteristics of the diverse range of communities who live and work in the force area. Without these in place it is difficult to see how the force will achieve its objective to secure a victim-centred approach to crime recording.

Some customer satisfaction data, feedback and complaints are gathered by the Home Office sponsored survey process and these are fed back into the force performance improvement framework; however these data are not used to inform information management and process improvement. Nevertheless the Home Office method is an independent process, and current levels of customer satisfaction using the process show the customer contact centre has a 97.4% satisfaction rate.

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

The force serious sexual offences policy describes how to deal with reports of rape; this has recently been reviewed. The policy clearly describes when and how reports of rape should be recorded. West Yorkshire Police had an incident classification called 'potential sexual incident' (PSI) which had been set up to assist decision-making in complex cases of rape and other serious sexual offences. The force has recognised that an unintended consequence of this process has been the development of a culture of investigate-to-record leading to delays in recording. The force has recently removed the PSI classification owing to these problems. As this is a recent development, the impact on decision-making is yet to be evaluated by the force.

There is a good network of sexual offence-trained officers across the force available 24/7 which aids early assessment and accurate recording.

The force is seeking to introduce central referral units to improve the management of third party referrals relating to vulnerable children and adults. The force has five district-based safeguarding units, all of which have different processes based on their differing relationships with their respective coterminous local authorities. At the moment these units tend to run investigations as a non-crime occurrence in the crime system (NICHE) which inevitably leads to a culture of investigate-to-record.

The force maintains a system of dropdown menus on the incident recording system (STORM) to assist effective decision-making by staff; however our inspection found some district control room operators prefer to use their own checklists that they cut and paste on to the incident log, ignoring the dropdown menus.

The force has worked hard to understand how rapes are reported into the organisation. This work was initiated by the findings of the HMIC audit in 2012. Since that time, comprehensive sampling, monitoring and auditing has taken place each month using a team of auditors which has been established within the information management unit to carry out this work. Additional quality assurance processes have been implemented within the customer contact centre since the rape policy was reviewed in early 2014.

The serious sexual offences policy describes how to deal with no-criming of rape records, which is in compliance with the HOCR; however this part of the policy is not widely understood and applied by officers and staff. The policy refers to a process where no-crime decisions for offences of rape are submitted to the FCIR for finalisation. We found little evidence that referrals were made to the FCIR and in reality, rape no-crime decisions are made by district-based detective inspectors. We dip-sampled 35 rape no-crime decisions and found that only 23 complied with the HOCR. This is unacceptable.

The force serious sexual offences policy explains how officers and staff are expected to deal with allegations of rape occurring in other force areas, including the crime transfer process and victim care expectations.

## **2.6 How do West Yorkshire Police IT systems allow for efficient and effective management of crime recording?**

West Yorkshire Police has created the information management department as a response to a recognised need to understand the IT systems and better to manage information as an asset. Consequently, significant work has been completed to map the IT systems and understand the causes of crime data integrity inaccuracy.

The force has a single system for each of its incident (STORM) and crime (NICHE) recording processes, and these systems are linked using the CORVUS (search engine and data extraction tool).

The force is trying to balance crime data integrity and data quality considerations. Automatic transfer of information without human screening has led to large numbers of duplicate records and duplicated addresses in the system. West Yorkshire Police is investing in technology which will help to manage the data quality risk, and has procured a new gazetteer - the iMatch tool - which sweeps databases to establish relationships and link records. The force has invested in mobile data solutions which will incorporate a standard data entry form, reducing the need to double key into different systems and improving the consistency of data entry. These developments are aimed at improving the force's ability to identify repeat victims reliably and increase the confidence with which data can be transferred automatically.

The force needs to work towards a situation where all crime records are automatically and safely transferred from STORM to NICHE with proper cross-referencing, thereby improving the ability to manage recording accuracy through more effective supervision, monitoring and auditing.

All IT systems containing reports of crime are well-managed and capable of being audited.

The information management department manages and coordinates the information systems. There is also a NICHE system administration team. A force review of the IT systems revealed that there were 70,000 duplicate nominal records held on corporate databases and also 400,000 non-standard and potentially duplicate addresses with implications for the Police National Database. The force is cleaning the databases while at the same time developing technical solutions to reduce the risk of poor data quality at the point of entry.

## People and skills

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

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

West Yorkshire Police was relatively late in developing a new operating model in order to adjust to the financial requirements of the comprehensive spending review. The force is now in the process of undertaking a major reorganisation aimed at maintaining effectiveness within the available finance. This reorganisation includes a significant investment in leadership training in process management and the management of recording standards. During the initial stages of restricting and making budget savings, the force's audit and assurance functions were reduced. Centralised processes were replaced by direct inputting by members of staff without any central governance and without staff being appropriately trained. The force is now working to rebuild effective processes to ensure accurate crime recording; however the lingering effect of the initial response to financial pressure is still evident.

We found that staff and supervisors making crime-recording decisions had received limited, or no, training on the HOCA and NCRS. The force has introduced a training course for all supervisors on decision-making and file quality. This course includes comprehensive coverage of the processes to manage the range of out-of-court disposals and the need for leadership in decision-making by supervisors as part of that process. The courses commenced in November 2013.

We found that the knowledge of recording standards and rules among specialist members of staff is inconsistent; computer-based training packages have been sent out to relevant members of staff.

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

Recognition of chief officers' messages concerning crime data integrity is inconsistent and there are some areas of the force where communication is yet to penetrate. We found a general level of understanding among members of staff about the need for accurate crime recording; however there is an inconsistent understanding of standards and rules. Non-adherence to HOCA is considered to be acceptable by some officers in circumstances where it is perceived that the crime will create too much work and or there are insufficient members of staff to deal with it.

Senior managers are encouraged to secure accurate crime recording and we did not find evidence of any pressure to under-record or otherwise record crime inaccurately; or in anyway work outside the NCRS in respect of outcomes. The consistent message from senior managers during our inspection was that the ethical recording message was very clear, but the extent to which chief officer messages on ethical recorded have penetrated below senior manager level is variable.

We found that while some members of staff receive support from their supervisors and managers to record crimes accurately, there is some implied pressure in sections of the force that encourages inaccurate crime recording. There was a general level of awareness of pressure to improve performance for certain priority crimes, in particular domestic burglary, and there was a view that the management of that performance leads to inaccurate classification of crime records. We found that in some instances, there were clear targets for the numbers of burglaries that could be recorded in a day. There was evidence from different parts of the force that screening takes place on certain crime types, sometimes by supervisors and other times by investigators, before the officer reporting was allowed to record the crime.

However during our inspection there was a consistent view among members of staff that pressure to record crime inaccurately had diminished considerably over the past 12 months.

The force has invested in training packages relating to out-of-court disposals. There is a network of trained sexual offence officers through the force who are responsible for the accurate recording of crime. Members of staff in the district control rooms and the customer contact centre are trained and developed to consistent standards including accurate recording of incidents. However the selection of district-based detective inspectors as designated decision-makers has placed individuals in a situation where they are constantly managing conflicts of interest while under pressure to improve performance.

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

The FCIR role has been greatly enhanced by the force. It has been integrated within the information management department and resources have been put in place for risk based auditing the FCIR has direct access to the deputy chief constable.

The FCIR is able to act objectively and impartially to ensure the force records crime correctly, including responsibility for the development, implementation and monitoring of crime recording and outcome policies, and subsequent audit programmes to ensure high standards of data integrity.

Recent changes implemented by the force have brought about a new audit team within the information management department. Within the team there are

three auditors whose work is entirely devoted to crime data integrity and they report directly to the FCIR. As a result, a certain level of auditing takes place; however this is insufficient to inform on all of the crime data accuracy risks faced by the force. Consideration should be given to consolidating all of the force assets used in auditing and evaluating crime data and strengthening the links to the FCIR.

Crime-recording disputes are suitably dealt with by local supervisors, crime evaluators, designated decision-makers and, in some cases, district-based crime managers. Some crime-recording disputes are suitably referred to the FCIR but not in every case. The FCIR has recently achieved a higher profile within the force and is becoming more influential in the management of disputes; however a structured framework is not in place which would ensure that disputes on high priority or high-risk crimes are invariably referred to the FCIR.