

Crime data integrity

Inspection of Wiltshire Police

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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 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 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.hmic.gov.uk.

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

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:

1. An examination of crime records for the period 1 November 2012 to 31 October 2013;
2. A dip-sample of out-of-court disposals (cautions, Penalty Notices for Disorder (PND), cannabis warnings, community resolutions) and no-crime decisions for rape, robbery and violence;
3. Visits to forces where inspectors assess local crime recording arrangements under three headings: leadership and governance; systems and processes; and people and skills; and
4. A peer review of audit findings by an NCRS expert from outside HMIC.

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

The scope and structure of the report

This report is divided into the following sections:

1. Part A: A summary of our findings, and recommendations;
2. Part B: Our findings in numbers;
3. Part C: Additional detailed inspection findings.

This report, undertaken at a force level, allows a qualitative assessment of the force's crime recording arrangements and to make recommendations for improvement.

Part A: Summary of inspection findings and recommendations

Leadership and governance

Chief officers in Wiltshire Police promote the importance of data integrity throughout the force. The deputy chief constable is the named officer responsible for crime data integrity.

From the spring of 2013, the chief constable has used a series of road show style presentations with an explicit message that all senior managers and frontline staff should ensure that they apply ethical crime recording practices. Despite these messages, many operational officers stated that they are looking for more overt signs and actions from the chief officer team to highlight their commitment to ethical crime recording that is free from performance pressures of any kind.

Recommendation: Immediately, the force should take steps to reinforce ethical standards to ensure appropriate crime recording and classification of all crime types. In support, the force should communicate a clear message to staff that ethical crime recording must override any performance pressures.

The force maintains an anonymous reporting line that officers can use to report concerns; this is supported by a document titled *What is Wrong-doing?* The document gives examples of wrong-doing, including misreporting performance data and unethical behaviour, although there is no explicit reference to crime recording standards.

The force does not have any specific policies in relation to crime recording. Instead, it relies on the National Crime Recording Standards (NCRS) and the Home Office Counting Rules (HOCR) as its primary source of guidance when necessary. There is no additional documentation to underline the need for ethical crime recording practice. The force crime registrar⁶ (FCR) believes that the force can rely on HOCR and NCRS without the need for additional guidance and is supported in this by the head of crime.

The force maintains a crime recording continuous improvement plan, which tracks progress against previous HMIC recommendations and other initiatives to improve crime data integrity.

⁶ 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.

However, the force does not routinely audit incident and crime records to assess their accuracy, and there is no flexibility within the work of the audit team. In the absence of a wider audit regime, there was little evidence of corrective action being extended out to frontline teams or individual officers where crime recording errors were discovered.

In 2013, the force re-focused the auditing resources into a validation team, and directed them towards those records most likely to contain missed crimes. As a consequence of this decision, audit resources are targeted towards rectifying a problem in records management and crime identification, rather than reviewing particular types or categories of crime where there are deemed to be higher levels of risk.

The results of the work carried out by the validation team are taken to the force's strategic improvement board and reviewed by the chief officer lead. The FCR does not attend this meeting. Despite these efforts, errors identified in the categories remain stubbornly high. Many of the errors are found to start within the control room, which indicates that the causes of these errors are not being effectively addressed.

Recommendation: Within three months, the force should ensure that it has effective supervision and a structured, yet proportionate, quality assurance process in place within the force control room to check on compliance with the NCRS.

A unit within the control room co-ordinates audits, including dip-sampling of calls and logs. The emphasis of these audits is on the quality of the call-handling techniques rather than on crime-recording skills. There are occasional themed audits but, for the most part, these are not related to higher-risk crimes or incidents.

The level of detail recorded on a crime is often directly related to the route by which it was reported rather than according to the seriousness or risk attached to the crime type. There is generally more detail recorded in directly reported crimes, where the victim speaks in person to the operator completing the crime record. The force has also identified that levels of customer service reduce when crimes are passed between units and systems.

The policing plan contains an ambition to achieve a 10 percent reduction in the absolute number of crimes and anti-social behaviour incidents in the county.

Systems and processes

Accuracy of crime recording

During this inspection, HMIC examined 64 incident records⁷ and found that 51 crimes should have been recorded. Of the 51 crimes that should have been recorded, 44 crimes were actually recorded. Of the 44, 1 was wrongly classified and one was recorded outside the 72-hour limit allowed under the HOCR. There is a need for improvement in the accuracy of crime-recording decisions.

The force has a centralised contact centre through which we have estimated that the force records approximately 50 percent of its total recorded crime. This unit records reports of crime directly from members of the public, and these do not require the creation of an incident record. Our inspection of this unit (a review of 54 calls and crimes recorded from the public) found that 56 crimes should have been recorded. Of the 56 crimes that should have been recorded, 54 were actually recorded, of which 1 was wrongly classified and 4 were recorded outside of the 72-hour limit allowed by the HOCR.

We examined 55 reports which were recorded separately on the public protection unit systems. We found that of those 55 reports, 16 should have been recorded as crimes. The force had recorded 8 crimes, which were all correctly classified, but 3 were recorded outside of the 72-hour limit allowed by the HOCR. As some of these records related to sexual offences and assaults on vulnerable adults and children, this is a great cause for concern and is a matter of material and urgent importance.

Recommendation: Immediately, the force should take steps to ensure that public protection teams record all crimes that are referred to them by other organisations (such as social services). This should be supported by proportionate and effective audit arrangements, through the FCR, to assure itself that reports held by this unit are properly recorded as crimes with particular attention directed to those involving vulnerable adults and children.

We found that the absence of policies on general crime and rape recording has contributed to lapses in service to victims such as those reporting crimes which have happened in other force areas. There is no guidance on original paperwork transmission; documents are being scanned and emailed and the originals left with the officer responsible.

⁷ An incident in this context is a report of events received by the police and 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),⁸ cannabis warnings⁹ and community resolutions.¹⁰ The HOCA (section H) states that national guidance must be followed¹¹.

Cautions – Out of the 25 cautions we dip-sampled, we found that in all cases, the offender's previous history made them suitable to receive a caution. In 20 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, 5 showed that the victims' views had been considered.

Penalty Notices for Disorder – We dip-sampled 20 PNDs. We were able to check the history of 17 cases and found that the offender was suitable to receive a penalty notice in 16 of them. In all 20 cases we found no evidence that the offender had been made aware of the nature and future implications of accepting the penalty notice. Out of the 15 cases, where there was a victim to consult, we found that 3 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 18. In 19 cases, we found evidence that the offender had been made aware of the nature and implications of accepting the warning.

Community resolutions – We took a dip-sample of 20 community resolutions and found that in 18 cases, either the offender had no previous offending history or the offender's past history still justified the use of the community resolution. Out of the 17 resolutions where there was a victim, all cases showed that the

⁸ 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.

⁹ 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.

¹⁰ 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.

¹¹ 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
- *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

wishes and personal circumstances of the victim had been considered properly. All cases showed that the agreed outcome was meaningful and appropriate¹².

The force has created a specific management post, reporting to the FCR, to oversee the delivery and scrutiny of out-of-court disposals. While this is good practice, there is a clear need for improvement in the consideration of the views of victims when using cautions and PND for victim-based offences.

There is a scrutiny panel for restorative justice, which comprises external organisations, such as a local magistrate and a representative from the office of the police and crime commissioner (OPCC). At its January 2014 meeting, this panel reviewed 15 cases and made observations on the management of each case. A number of the cases were referred back to the force for deeper scrutiny. This is good practice.

Some staff responsible for dealing with out-of-court disposals believe that there is a target to dispose of 75 percent of all cases by community resolution; this seems an unrealistic target given the context of their use. Supervisory officers we interviewed felt that there is no standard across the force when considering out-of-court disposals and that decision-making in such cases was hugely subjective. They considered that there was the need for strategic direction and a force policy.

Recommendation: Immediately, the force should take steps to improve the supervision of its use of out-of-court disposals to ensure that they are only used in appropriate circumstances and the views of the victim are taken into account. In particular they should not be used when the offending history of the offender precludes their use. Immediately, the force should provide clarity and guidance for operational officers on the use of out-of-court disposals, and particularly community resolutions, to ensure they are being used appropriately and ethically.

No-crimes

No-crime refers to an incident that was recorded as a crime initially but has been found subsequently not to be a crime on the basis of additional verifiable information¹³. We reviewed 58 no-crime records and found 49 records to be compliant with the HOCR and NCRS.

¹² 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, 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.

¹³ Information which can be verified by the police to show that a recorded crime did not occur, thereby enabling the police to reclassify a recorded crime as a no-crime (HOCR, General Rules Section C, No Crimes).

All no-crime decisions are either taken by the FCR or the crime standards auditors' (CSA) team which reports directly to the FCR. This means there is little chance of performance pressures coming into play and that judgments are consistent.

The FCR's additional management responsibilities mean that she is unable to conduct as much checking on the work of her team as she would wish.

The change in the audit regime has also meant that routine audits of no-crimes are not carried out. Following our inspection, the FCR carried out additional training in the CSA to ensure the consistent application of the rules.

Victim-centred approach

Wiltshire Police, and particularly the police and crime plan, promote and display a victim-centred approach to crime recording, crime outcomes and no-crime decisions. This plan describes extensive work to ensure victims are provided with the highest possible level of service. This approach may assist with local satisfaction rates of those people who come into contact with the service.

Almost all frontline operational officers and support staff are enthusiastic and positive about ethical crime recording practice. All of the 51 calls into the control rooms reviewed by HMIC revealed that the operator had been helpful, polite and professional.

The force does not collect routinely the views of people who report incidents and crime. Recently, following a fall in satisfaction rates involving victims of violent crime, additional local group meetings were held in the county. While there is a force working group which considers customer satisfaction data, reality checks in most areas linked to crime recording revealed little evidence of the use of customer satisfaction data to improve processes.

Rape offences

Wiltshire Police does not have a policy on how rape crimes should be accurately and ethically recorded; however, officers and staff have an understanding of the need for ethical and accurate recording of rape crime.

An internal report entitled, *A review of the recording and disposal of sexual offences 2012/13* concludes that "*Wiltshire Police has intentionally or inadvertently, manipulated the recording of sexual offences and thereby improved the perception of performance*". The report estimates the number of rapes not recorded at around 50, and that around 30 serious sexual offences were dealt with by way of community resolutions including rape and sexual activity with a child. The latest force checks have identified some 58 such outcomes, of which, in the previous year, 5 were for rape crimes.

The force has made a considerable investment into understanding reports of rape received by all reporting routes. This has enabled the force to have a

greater degree of confidence in its ability to demonstrate oversight of these routes. One of the main benefits of the creation of the validation team is that there is now active scanning of the principal route in which most crimes of rape are presented to the force.

The force is to be commended for undertaking this review, but a number of the review's 12 recommendations, which have been incorporated into the continuous improvement plan, have yet to be implemented fully.

The force has indicated its agreement to send to the Home Office a revised annual data return on the number of rape crimes once the full review of the situation is complete.

The force does not have a policy setting out how to deal with no-criming of reports of rape. The monitoring of the accuracy of rape no-crime decisions is carried out in the same way as other no-criming decisions within the FCR's team.

There is no policy for setting out how officers and staff should respond to allegations of rape occurring in other force areas. In practice, those dealing with such a report of crime, outlined that they would treat it in the same manner as any other crime reported as occurring elsewhere.

Recommendation: Immediately, the force should take steps to ensure that recommendations from its internal review of the management of reports of rape have been implemented. There should be continuing and effective supervision and scrutiny of reports of rape.

IT systems

The force uses a single computer system for each of its incident (STORM) and crime (NICHE) recording functions. These systems are linked. NICHE is also used by the public protection unit (PPU).

Wiltshire Police is working with Wiltshire Council and ever-greater integration of information technology (IT) systems is taking place. The council provides much of the expertise for IT maintenance and architecture design. The project will address attitudes and the behaviour of staff involved in inputting data by providing training. The project is estimated to need a year to be implemented, after which other systems will be reviewed in a similar way.

People and skills

Staff and supervisors responsible for managing out-of-court disposals and no-crimes, and those working in specialist departments were found to have an appropriate knowledge of NCRS and HOCR. Initial training is provided to staff who work in areas critical to accurate crime recording standards. This has been supplemented with additional presentations by the FCR. Guidance training

material for workers in the control rooms has been drawn up by the FCR to reinforce the requirements.

High staff turnover in the control rooms erodes continually the knowledge and experience base on crime recording standards. This has been described as reaching critical levels in the recent past, but has since been stabilised.

There has been little awareness training beyond email briefing for most operational staff about the HOOCR and NCRS.

Recommendation: Within six months, the force should establish and begin operation of an adequate system of training in crime-recording for all police officers and police staff who are responsible for making crime-recording decisions, and ensure those who require such training receive it as soon as reasonably practicable.

There is a noticeable change of direction being signalled by the current chief officer team and staff welcome the freedom to record crime accurately without having to worry about any impact on crime performance levels. There are signs of senior managers being encouraged to pursue positive crime data integrity approaches.

There appears to be, however, a group of middle managers in the force, who retain implicitly and, in some cases, explicitly a performance pressure culture based on pre-set levels of crime. A number of operational officers saw a contradiction between the high-level messages about crime data integrity and the approach of some managers. Cases were described where subtle pressures were placed on those deciding on the classifications of crime to adjust a serious crime such as an attempted burglary of a dwelling house to a less serious crime of criminal damage. This is described as becoming more frequent as the end-of-year crime performance figures are calculated. To their credit, these attempts by some managers to change the classification of crimes to less serious matters are normally strongly resisted by decision makers.

Force crime registrar

We found the Wiltshire Police FCR to be extremely experienced, capable and the recognised champion of positive crime recording standards, and that she is able to act objectively and impartially. The FCR has additional areas of responsibility that detract substantially from her ability to lead audit activity and focus on her core responsibilities.

The chief officer lead would like to make more resources available to the FCR to conduct a wider range of auditing. However, given the financial pressures on the force, the view is that these additional resources are unlikely to be made available in the near future.

Recommendation: Within three months, the force should ensure the FCR has sufficient resources and 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. Audit findings should be subject to scrutiny through force-level performance meetings.

While the FCR has the full support of the deputy chief constable, she has had to rely on line managers to convey many important messages to chief officers or strategic-level meetings, as her access to the chief officer lead is not formalised through a meeting structure.

Recommendation: Immediately, the force should take steps to include the FCR in force-level performance and policy meetings to ensure that crime recording standards are considered when scrutinising performance and developing policy.

The chief officer lead was emphatic that the FCR was an invaluable source of reference in the formulation of crime recording decisions and other related policies, and that the FCR is consulted ordinarily on anything which might affect local practice in crime recording. The FCR believes that the force can rely on the HOCR and NCRS without the need for additional guidance and is supported in this view by the head of crime.

Recommendations

Immediately

1. The force should take steps to reinforce ethical standards of crime recording to ensure appropriate crime recording and classification of all crime types. In support, the force should communicate a clear message to staff that ethical crime recording must override any performance pressures.
2. The force should take steps to ensure that public protection teams record all crimes that are referred to them by other organisations (such as social services). This should be supported by proportionate and effective audit arrangements, through the FCR, to assure itself that reports held by this unit are recorded properly as crimes with particular attention directed to those involving vulnerable adults and children.
3. The force should take immediate steps to improve the supervision of its use of out-of-court disposals to ensure that they are only used in appropriate circumstances and the views of the victim are taken into account. In particular they should not be used when the offending history of the offender precludes their use. The force should provide clarity and guidance for operational officers on the use of out-of-court disposals, and

particularly community resolutions, to ensure they are being used appropriately and ethically.

4. The force should take steps to ensure that recommendations from its internal review of the management of reports of rape have been implemented. There should be ongoing and effective supervision and scrutiny of reports of rape.
5. The force should take steps to include the FCR in force-level performance and policy meetings to ensure that crime recording standards are considered when scrutinising performance and developing policy.

Within three months

6. The force should ensure that it has effective supervision and a structured, yet proportionate, quality assurance process in place within the force control room to check on compliance with the NCRS.
7. The force should ensure the FCR has sufficient resources and 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. Audit findings should be subject to scrutiny through force level performance meetings.

Within six months

8. The force should establish and begin operation of an adequate system of training in crime-recording for all police officers and police staff who are responsible for making crime-recording decisions, and ensure those who require such training receive it as soon as reasonably practicable.

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 Wiltshire 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 Wiltshire Police recorded the following number of crimes
64	51	44
Crimes reported directly from the victim		
HMIC reviewed the following number of reports of crimes that were reported directly by telephone to the Wiltshire 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 Wiltshire Police should have recorded.	From these identified crimes Wiltshire Police recorded the following number of crimes.
54	56	54
Crimes referred from other agencies directly to Wiltshire Police specialist departments		
Referrals	Crimes identified	Crimes recorded
HMIC reviewed the following number of referrals reported directly to Wiltshire Police specialist departments from other agencies which contained reports of crime.	From these referrals to specialist departments HMIC identified the following number of crimes that Wiltshire Police should have recorded	From these identified crimes Wiltshire Police recorded the following number of crimes.
55	16	8
No-crimes		
HMIC reviewed the following number of recorded crimes of rape, violence and robbery which Wiltshire Police had subsequently recorded as no-crime.	From these HMIC assessed the following number of no-crime decisions as being correct.	
58	49	

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

Within Wiltshire Police, the deputy chief constable is the lead chief officer with overall responsibility for crime data integrity issues, for directing force performance and holding others to account for performance. He is the chair of the strategic improvement board which often ratifies the most important initiatives or proposals discussed at a monthly practitioner working group convened by the head of crime.

From the spring of 2013, the chief constable has used a series of road show style presentations to communicate a move towards a more customer focused style of local policing, with an explicit message that all senior managers and frontline staff should ensure that ethical crime recording practices are applied. Despite these messages, many operational officers spoken to during the inspection openly stated that they are looking for more overt signs and actions from the chief officer team signalling a commitment to ethical crime recording free from performance pressures of any kind.

A force-wide publicity campaign entitled '*Ways to report wrong-doing*', and a document titled '*What is Wrong-doing?*' set out how to report integrity concerns anonymously and the protection available to whistle-blowers. The latter document gives examples of wrong-doing, including misreporting performance data and unethical behaviour, although there is no explicit reference to crime recording standards. Chief officers are sighted on reports and have taken appropriate action on some serious matters reported to them.

The force does not have any specific policies in relation to crime recording. Instead, it relies on the National Crime Recording Standards (NCRS) and the Home Office Counting Rules (HOCR) as its primary source of guidance, when necessary. In one location visited, the staff were relying on an outdated copy of the HOCR from 2008, which would not have provided a good source of

reference. There is, therefore, no additional documentation to underline the need for ethical crime recording practice.

The policing plan contains an ambition to achieve a ten percent reduction in the absolute number of crimes and anti-social behaviour incidents in the county. There is no specific reference to crime recording standards but many of the main initiatives set out have a direct impact on out-of-court disposals and a more victim-centred approach to crime recording and policing.

The organisational principles, and values adopted by the chief officer team linked to the priorities of the police and crime plan provide a positive environment in which crime recording standards and integrity of practice can firmly become established.

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

Wiltshire Police understands the range of potential risk areas from inaccurate crime recording but has yet to develop a full understanding of the risks it faces at an organisational level. There is a well-documented crime recording continuous improvement plan, which tracks progress against previous HMIC recommendations and other initiatives to improve crime data integrity. A year ago, the head of crime amended the audit programme to better reflect the identified risks, such as some types of crime not being properly recognised or recorded, a failure to record crimes within 72 hours, and the tendency of specialist investigators in the public protection unit (PPU) to become committed fully to a thorough investigation without ensuring the necessary crime records have also been created.

As a consequence of this decision, audit resources are targeted on rectifying a problem in records management and crime identification rather than reviewing any particular types or category of crime where there are deemed to be higher levels of risk. The FCR has carried out some small-scale auditing of areas such as anti-social behaviour to check for potentially missed records of crime but the audit is relatively small in scale. A detective sergeant routinely scans all sexual offence incidents in the incident recording system (STORM) and checks crime records in an effort to prevent the inaccurate recording of rape and other serious sexual offence crimes.

The level of detail recorded on a crime is often related directly to the route by which it was reported rather than according to the seriousness or risk attached to the crime type. Force processes of recording can materially have an impact on how much information is recorded. The short crime report, introduced following a national review of bureaucracy some years ago, limits what is recorded; while the crime system (NICHE) requires more details and does not always take account of the need for proportionality of detail.

There is generally more detail recorded in directly reported crimes, when an officer speaks in person to the operator completing the crime. The force has also identified that levels of customer service reduce when crimes are passed between units and systems.

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

Currently, there is a limited understanding of the channels through which crime is recorded within the force. The force is working, to try to understand all the sources of demand, including crime reporting, based on a system developed by Wiltshire Council. However, this has yet to set out a clear picture of the proportions of crime reported through various channels into the force. Some quality checks are carried out in relation to telephone reports, but few other measures are in place.

The force does not routinely audit incident and crime records to assess crime recording accuracy, and there is no flexibility within the work of the audit team. In the absence of a wider audit regime, there was little evidence of corrective action being extended out to frontline teams or individual officers where crime recording errors were discovered. Auditing activity across a range of important areas of crime and incident recording needs to be resumed as soon as possible.

As already outlined, the head of crime (with the agreement of the chief officer lead), refocused the bulk of the auditing resources, through the creation of a validation team in early 2013 on records which were most likely to contain missed crimes. These are crime related incidents (CRI)¹⁴ and records on the NICHE crime system that are called pending crime classification occurrences (PO)¹⁵.

The results of the validation team work in relation to both CRI and PO are taken to the force strategic improvement board and reviewed by the deputy chief constable. The FCR does not attend this meeting but the head of crime and his chief inspector provide commentary on the results, which are fed into the continual improvement plan.

There is evidence of proportionate action to address crime recording errors. However, while the total numbers of CRI and PO appear to be dropping, the number of errors identified in the categories, after an initial sharp fall, remain

¹⁴ A CRI is a crime that has been reported by a third party (not the victim or a person reasonably assumed to be acting on behalf of the victim) or where the HOCR dictate that this classification is to be used for out-of-force crimes.

¹⁵ A Pending Crime Classification Occurrence is a crime reported by a victim or a person reasonably assumed to be acting on behalf of the victim where the information provided is thought to be insufficient when first brought to police attention to select the appropriate crime classification.

stubbornly high. Many of the errors are found to start within the control room, which indicates that the causes of these errors are not being effectively addressed.

There is an established system for monitoring some calls and incidents within the control rooms. A unit called assessment and development, co-ordinates audits in the control rooms. A sample of calls and logs are reviewed on a random basis involving three calls for each operator every three months. If these performance checks reveal a problem, the degree of oversight increases. However, the emphasis of these audits is on the quality of the call-handling techniques rather than on crime-recording skills. There are occasional themed audits but for the most part these are not related to higher-risk crimes or incidents.

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

During this inspection HMIC examined 64 incident records and found that 51 crimes should have been recorded. Of the 51 crimes that should have been recorded, 44 were actually recorded. Of the 44, 1 was wrongly classified and 1 was recorded outside the 72-hour limit allowed under the HOCR. There is a need for improvement in the accuracy of crime recording decisions.

The force also has a force contact centre through which we have estimated that the force record approximately 50 percent of their total recorded crime. This unit records reports of crime directly from members of the public which do not require the creation of an incident record. Our inspection of this unit (a review of 54 calls from the public) found that 56 crimes should have been recorded. Of the 56 crimes that should have been recorded, 54 were, of which one was wrongly classified and four were recorded outside of the 72-hour limit allowed by the HOCR.

We examined 55 reports which were recorded separately on the public protection unit systems. We found that of those 55 reports, 16 should have been recorded as crimes. The force had recorded 8. Of these 8, all were correctly classified but 3 were recorded outside of the 72-hour limit allowed by the HOCR. As some of these records related to sexual offences and assaults on vulnerable adults and children, this is a significant cause of concern and is a matter of material and urgent importance.

The absence of policies on general crime recording and rape has contributed to lapses in service to victims such as those reporting crimes which have happened in other force areas. Additionally, there is no guidance on original paperwork transmission; documents are being scanned and emailed and the originals left with the officer responsible.

2.2 How does Wiltshire 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 25 cautions we dip-sampled we found that in all 25 cases, the offender's previous history made them suitable to receive a caution. In 20 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 five cases showed that the views of the victim had been considered.

Penalty Notices for Disorder – We dip-sampled 20 PNDs. We were able to check the history of 17 cases and found that the offender was suitable to receive a penalty notice in 16 of them. In all cases, we found no evidence that the offender had been made aware of the nature and future implications of accepting the penalty notice. Out of the 15 cases, where there was a victim to consult, we found that three 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 18 cases. In 19 cases we found evidence that the offender had been made aware of the nature and implications of accepting the warning.

Community resolutions – We took a dip-sample of 20 community resolutions and found that in 18 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 17 resolutions where there was a victim, all cases showed that the wishes and personal circumstances of the victim had been properly considered. All cases showed that the agreed outcome was meaningful and appropriate.

The force has created a specific management post, reporting to the FCR, to oversee the delivery and scrutiny of out-of-court disposals. This post has only recently been filled, and backlogs of out-of-court cases have been raised as a concern.

There is a scrutiny panel for restorative justice, which comprises external organisations, such as a local magistrate and a representative from the office of the police and crime commissioner (OPCC). At its January 2014 meeting, this

panel reviewed 15 cases and made observations on the management of each case. A number of the cases were referred back to the force for deeper scrutiny. This is good practice.

Some staff responsible for dealing with out-of-court outcomes believe that there is a target to dispose of 75 percent of all cases by community resolution; this seems an unrealistic target given the context of their use. Supervisory officers interviewed during the inspection felt that there is no standard across the force when considering out-of-court outcomes and that decision making in such cases was hugely subjective based upon the person making the decision and information available regarding the offender. They considered that there was the need for strategic direction and a specific force policy on this issue.

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

No-crime refers to an incident that was recorded initially as a crime but has subsequently been found not to be a crime on the basis of additional verifiable information. We reviewed 58 no-crime records and found 49 records to be compliant with the HOCR and NCRS.

All no-crime decisions are either taken by the FCR or the crime standards auditors' (CSA) team who report directly to the FCR. This means there is little chance of performance pressures coming into play and judgments are consistent.

HMIC found that, on occasion, there is a backlog in crimes awaiting adjudication, again reflecting pressures on resourcing in this area. Additional FCR management responsibilities mean that she is unable to conduct as much checking on the work of her team as she would wish.

The change in the audit regime has also meant that routine audits of no-crimes are not carried out. Following our audit, the FCR carried out additional training in the CSA to ensure the consistent application of the rules.

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

Wiltshire Police and particularly the police and crime plan promote and display a victim-centred approach to crime recording, crime outcomes and no-crime decisions. This plan describes extensive work to ensure victims are provided with the highest possible level of service. This approach may assist with local satisfaction rates of those people who come into contact with the service.

Frontline operational officers and support staff are almost universally enthusiastic and positive about ethical crime-recording practice. All of the 51 calls into the control rooms we reviewed revealed that the operator had been helpful, polite and professional. In marked contrast, the wider audit revealed certain categories of crime management where a victim-centred approach was

not strong. For example, consultation with the victim before deciding on an outcome often was not recorded, as in the case with 5 out of 15 victims in caution files. Similarly, omissions were made by not informing a victim that a crime had been no-crimed; this was the case in 9 of the 16 violence no-crimes reviewed. The appointment of a new out-of-court outcome manager may assist in closing these gaps in service delivery.

The force does not collect routinely the views of people who report incidents and crime, although this is a documented ambition in the police and crime plan, in order to improve customer service, it is yet to become a reality. Recently, following a fall in satisfaction rates involving victims of violent crime, additional local group meetings were held in the county. While there is a force working group, which considers customer satisfaction data, reality checks in most areas linked to crime recording revealed little evidence of the use of customer satisfaction data to improve processes.

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

Wiltshire Police does not have a policy on how rape crimes should be accurately and ethically recorded; this as a priority given concerns about the manner in which such crimes have been handled in some recent cases.

Officers and staff have an understanding of the need for ethical and accurate recording of rape crime as a direct result of recent events in the county. The Independent Police Complaints Commission (IPCC) is investigating currently the death of a woman following police contact, and allegations that she made a number of unsuccessful attempts to report a crime involving a very serious sexual offence. As a consequence, the force has put additional effort into briefing staff in specialist teams dealing with sexual offences and rape. Any incident involving an allegation of rape results in the mandatory attendance of an officer.

The force has made a considerable investment into understanding the totality of rape allegations received by all reporting routes. This has enabled the force to have a greater degree of confidence in its ability to demonstrate oversight of these routes. One of the key benefits of the creation of the validation team looking at CRIs and POs is that there is now active scanning of the principal route in which most crimes of rape are presented to the force.

An internal report entitled, *A review of the recording and disposal of sexual offences 2012/13* concludes that “*Wiltshire Police has intentionally or inadvertently, manipulated the recording of sexual offences and thereby improved the perception of performance*”. This report estimates the number of rapes not recorded at around 50, and that in the year 2012/13 around 30 serious sexual offences were dealt with by way of community resolutions including rape and sexual activity with a child. The latest force checks have

identified some 58 such outcomes, of which, in the previous year, 5 were rape crimes. This is unacceptable.

The report was commissioned in May 2013 by the head of crime to check the culture and practices in force specialist teams investigating sexual offences including rape. The force is to be commended for undertaking this self-generated review, but a number of the review's 12 recommendations, which have been incorporated into the continuous improvement plan, have yet to be implemented fully.

The force has indicated its agreement to send to the Home Office a revised annual data return on the number of rape crimes once the full review of the situation is complete.

The force does not have a policy setting out how to deal with no-criming of reports of rape, and the monitoring of the accuracy of such decisions is carried out in the same way as other no-criming decisions within the FCR's team. The separate nature of the unit diminishes the chances of inappropriate pressures affecting the judgments made. Each crime has been reviewed initially by a detective inspector to make sure it fits the criteria for this action. The FCR is anxious to spend more of her time overseeing and being involved in this sort of activity.

There is no policy for setting out how officers and staff should respond to allegations of rape occurring in other force areas. In practice, those dealing with such a report of crime, outlined that they would treat it in the same manner as any other crime reported as occurring elsewhere.

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

The force utilises a single computer system for each of its incident (STORM) and crime (NICHE) recording functions. These systems are linked. The public protection unit (PPU) also uses the NICHE system.

Wiltshire Police working with Wiltshire Council and ever-greater integration of information technology (IT) systems is taking place. The council provides much of the expertise for IT maintenance and architecture design. The project will address attitudes and behaviours of staff involved in data inputting through training plans. The project is estimated to need a year to be implemented, after which other systems will be reviewed in a similar way.

People and skills

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

3.1 What arrangements do Wiltshire Police have in place to ensure that staff have the necessary skills to ensure accurate crime recording?

Wiltshire Police has sufficient staff and supervisors in the main areas responsible for recording or reviewing incidents and crimes apart from the outcome manager's post, which had remained vacant for a long period of time. Most of these individuals have received training in relation to the HOCR, NCRS and the National Standard of Incident Recording (NSIR). Initial training is provided to staff who work in areas critical to accurate crime recording standards. This has been supplemented with additional presentations by the FCR with special emphasis on the difference between matters that should remain CRIs and those records, which should immediately become crimes. Guidance material for workers in the control rooms has been drawn up by the FCR to reinforce this requirement.

High staff turnover in the control rooms erodes continually the knowledge and experience base on crime recording standards. This has been described as reaching critical levels in the recent past, but has since been stabilised.

Some staff and supervisors responsible for applying out-of-court disposals and no-crimes have an appropriate knowledge of HOCR and national guidance. The force has relied on an e-learning package to increase awareness but there is recognition that more investment of focused activity is needed. Reference material is available to staff on the force intranet if needed.

The detective inspector, who authored the review of sexual offences, has been working in conjunction with the FCR, to train specialist staff in making crime-recording decisions. They are working together to ensure these specialists have an appropriate knowledge of the HOCR and NCRS. The detective inspector has produced a briefing for such staff on the essentials of crime recording, having developed an excellent understanding of the subject herself. This is relatively short, in an easy to understand form, and is commended as good practice.

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

There is a noticeable change of direction being signalled by the current chief officer team, and staff welcome the freedom to record crime accurately without having to worry about any impact on crime performance levels. There are signs of senior managers being encouraged to pursue positive crime data integrity approaches. These are recorded in the minutes of key force meetings and reinforced by the chief officer team in daily business.

There appears to be, however, a group of middle managers in the force, who implicitly, and in some cases, explicitly retain a performance culture based on pre-set levels of crime. A number of operational officers saw a contradiction between the high level messages about crime data integrity and the approach of some managers. Cases were described where subtle pressures were placed on those deciding on the classifications of crime to adjust a serious crime, such as an attempted burglary of a dwelling house, to a less serious crime of criminal damage. This is described as becoming more frequent as the end-of-year crime performance figures are calculated. To their credit, these attempts by some managers to change the classification of crimes to less serious matters are resisted by decision makers.

Conscious of some of these pressures, the force actively is reviewing its accountability structures through an evidenced-based performance culture review, and performance culture management board.

HMIC found limited evidence that crime-recording standards feature in regular training, development and selection practices. There has been little awareness training beyond email briefing for most operational staff about the HOCR and NCRS. A previous HMIC inspection noted that officers tend to use the Crown Prosecution Service's charging standards to inform their thinking about what crime to record. This action was closed on the force continuous improvement plan with the comment that an e-brief was circulated. There is no evidence of the effectiveness of this circulation being tested and perceptions around crime recording standards have not necessarily moved on from being centred on charging standards interpretations.

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

The FCR has a specific responsibility for ensuring that the NCRS and HOCR are consistently applied. We found her to be extremely experienced, capable and the recognised champion of positive crime-recording standards, and that she is able to act objectively and impartially. It is noted that she communicates well with colleagues in the region and nationally to make sure she is up to date with the latest interpretations on crime matters. The FCR has additional areas of responsibility that substantially detract from her ability to lead audit activity and focus on her core responsibilities.

The chief officer lead would like to make more resources available to the FCR to conduct a wider range of auditing. He recognises that the shift of resources to proactive checks in the validation unit has undercut the ability of the FCR to test a range of force practice in regard to crime recording. Given the financial pressures on the force, the view is that these additional resources are unlikely to be made available in the near future.

Within Wiltshire Police, most crime-recording disputes are resolved at a very local level, but when crimes are escalated beyond this level, the FCR, as the

recognised final arbiter is called upon to make a decision and resolve disputes. There have been two occasions in the past when her judgment was robustly challenged; however a referral to the National Crime Registrar confirmed her judgment on both occasions.

While the FCR has the full support of the deputy chief constable, she has had to rely on her line managers to convey many important messages to chief officers or strategic level meetings, as her access to the chief officer lead is not formalised through a meeting structure.

The chief officer lead was emphatic that the FCR was an invaluable source of reference in the formulation of crime recording decisions and other related policies, and that the FCR is consulted ordinarily on anything, which might affect local practice in crime recording.