

Police and Crime Commissioner West Midlands response to the publication of
West Midlands Police: Crime Data Integrity Re-Inspection 2018¹

by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Service (HMICFRS)

Overall rating for West Midlands Police	Inadequate
Number of recommendations	4

On 15 January 2019 HMICFRS published the report on their West Midlands Police Crime Data Integrity Inspection which examined crime reports for the period 1 March 2018 to 31 May 2018.

HMICFRS estimated that:

- 78.2 percent of violent crime (with a confidence interval of +/- 2.87 percent); and
- 89.2 percent of sexual offences (with a confidence interval of 2.70%).

HMICFRS found that West Midlands Police had:

- designated the deputy chief constable (DCC) as the lead for the CDI improvement plan;
- developed and begun to implement bespoke crime-recording improvement plans for all relevant departments;
- improved its arrangements for the recording of modern slavery offences; and
- continued to provide crime-recording training to officers and staff responsible for making crime-recording decisions.

However, the report concluded:

“West Midlands Police has improved some elements of its crime-recording arrangements since our 2017 crime data integrity (CDI) inspection report. However, we found more still needs to be done.”

¹ <https://www.justiceinspectorates.gov.uk/hmicfrs/our-work/crime-data-integrity/reports-rolling-programme-crime-data-integrity/>

Under the Policing and Crime Act 2017 PCCs must publish a response to HMICFRS reports, together with any comments submitted by the Chief Constable, within 56 days of the report being published. Where reports include recommendations the response must include an explanation of the action the PCC proposes to take in response. The overall response as well as responses from WMP and the PCC to individual recommendations are set out below.

Overall response

The integrity of police recorded crime data is important. Only last week this importance has been brought into relief with the Home Secretary, Deputy National Statistician, police forces and police and crime commissioners engaged in discussion around the true picture of crime trends in England and Wales and what this means for policing demand and resources.

Accurate crime data are needed to inform the public of issues affecting their areas and by policy makers to guide decision-making and resource allocation at a national and local level. As set out in my Police and Crime Plan, I expect high standards of crime recording. When a crime is committed the public should be able to trust the police to deal with it appropriately and effectively, recording the crime accurately so the right action can follow.

www.westmidlands-pcc.gov.uk/your-commissioner/police-and-crime-plan

Most importantly, behind each recorded crime is a victim. Standing up for victims has always been a priority of mine and I want victims of crime to have confidence in reporting crimes to West Midlands Police. I am therefore pleased that HMICFRS found “strong leadership from senior officers in West Midlands Police in regard to crime-recording expectations” and “an approach among the majority of officers and staff that places the victim at the forefront of their crime-recording decisions”.

While I am encouraged that the culture around crime recording in the West Midlands Police is positive, HMICFRS’ rating of the force as ‘Inadequate’ overall, with 16 per cent of crimes either unrecorded or incorrectly recorded, is a clear concern. I have asked the force to make rapid improvements, ensuring that safeguarding of victims is as robust as possible.

Following the publication of the HMICFRS Crime Data Integrity Inspection report I requested a report from West Midlands Police to my Strategic Policing and Crime Board. The force has also shared with me their CDI Improvement Plan and I will continue to assess the force’s progress with respect to the Improvement Plan, through the Joint Audit Committee, and other avenues including regular progress updates between WMP and members of my Strategic Policing and Crime Board and office.

<http://www.westmidlands-pcc.gov.uk/strategic-policing-and-crime-board/spcb-dates-of-meetings-and-reports/spcb-agendas,-minutes-and-reports/>

However, I think it important to reflect on this issue at a national as well as local level. West Midlands Police is far from the only force to have been rated as 'Inadequate' in the 2016/17 HMICFRS CDI inspection programme and, whilst we appreciate the more robust methodology employed this time around, the 'Inadequate' rating is of particular concern given that, as HMICFRS note in the report, the force has taken action to improve crime-recording accuracy in recent years, including taking on recommendations from the 2014 HMIC report and making good progress against the national action plan.

I will continue to monitor the force's performance with respect to crime recording and stand up for victims, ensuring they are at the heart of the service. I also welcome continued engagement with HMICFRS as well as with the Home Office to ensure that lessons are learnt as they emerge from the full national programme of CDI inspections.

Cause of concern

In West Midlands Police, officers and staff fail to make correct crime-recording decisions at the first opportunity. This is due to deficiencies in the force's crime-recording processes, insufficient understanding of crime-recording requirements and limited supervision to correct decisions and improve standards from the outset. This means that the force is failing many victims of crime.

The force is failing to ensure it adequately records all reports of sexual offences and violence, including domestic abuse crimes and crimes reported directly to its public protection department.

Recommendation 1

Within six months, West Midlands Police should take steps to identify and address gaps in its systems and processes to ensure that when officers have attended incidents all reported crimes are recorded. This should include satisfying itself as to the effectiveness of its arrangements for the recording of crimes by officers through the crime service team. The force also needs to implement a consistent and structured approach to call-handling quality assurance processes that includes checking compliance with the National Crime Recording Standards.

WMP response:

Since the 2017 CDI inspection, WMP has undertaken an extensive review of crime recording across the force area, applying the HMICFRS 'field work' methodology, which helped identify the barriers to crime recording. A CDI Gold Group has been established to oversee the HMICFRS recommendations and is chaired by the DCC. The 2017 CDI improvement plan was revisited, refreshed and updated. Each Core Department; Force Contact, Force Response, Public Protection Unit, Force CID and Initial Investigation Teams have their own CDI improvement plans, which feed into the overall force plan.

The force has invested in a new IT infrastructure and technology; (i). Control Works (Command and Control system) (ii). Connect (Crime System). Control Works will be introduced in late 2019, which will include embedding the 'telephone call' within the incident log, allowing officers to listen to the 'original' call and have a clear understanding of what the victim is reporting. The system will also look to provide a 'rationale box' for officers to complete when a crime isn't recorded. Steve Bond (Home Office National Crime Registrar) has since provided guidance on the '*negation of crime*'.

WMP has purchased Connect Express / Go which will allow officers to record crime through their mobile devices whilst at the scene of a crime. The crime recording decision tree will assist officers in making the correct crime recording decision. This will allow for digitally record crime at the scene and improve timeliness of crime recording.

The mobility crime recording concept is also being adapted for Desk Top use for the Initial Investigation Team; if successful this will be extended to the PPU Central Referral Unit,

Modern Slavery Team and Domestic Abuse Resolution Team.

Force Contact continues to complete a monthly log audit which assesses the log details from a number of perspectives, including crimes recording, THRIVE assessment and any deployment grading changes etc. Following on from their 80 point plan, they have increased the number of logs reviewed; which now includes open logs for effective management, response compliance, escalation decisions etc., There is also a specific focus vulnerability logs (including Domestic Abuse, Child Abuse, Missing Persons etc.). The Force Contact review process includes 1-2-1 call listening within Contact Centres, where each supervisor assesses the management and handling of selected calls.

Whilst HMICFRS Inspection findings for Violence and Sexual Offences mirror those identified by our own audit team, the '*All Other*' crime category has significantly improved (*in excess of 90%*) but was not included within the final CDI inspection report. The force remains committed to determined improvement activity for Violence and Sexual Offences.

PCC response

WMP have shared their CDI improvement plan with me and I am pleased with the attention the FCR, Deputy FCR and Force Executive have given this issue. However it will be important to ensure that efforts to improve crime recording are maintained in the complex and challenging environment of modern policing in which WMP and other forces operate.

I have asked WMP to report back to my office through a variety of means, including the Strategic Policing and Crime Board, bimonthly meetings with representatives from my office and through the Joint Audit Committee, to keep me apprised of the situation with respect to CDI so I can ensure that the improvement plan is implemented.

Recommendation 2

Within three months, the force should review its operating arrangements to ensure that these arrangements secure the recording of all reported crimes at the first point at which sufficient information exists to make a crime-recording decision, and in any event within 24 hours of receipt of the report.

WMP response:

WMP advised HMICFRS in 2017 that this recommendation wasn't viable due to demand, the volume of calls received (5,700 per day) and the current operating model. The recommendation is under review and will be revisited when WMP introduces its new Command & Control system - Control Works (late 2019) and the new crime recording system Connect (late 2019/20)

The Force is recording more crime at point of call, currently around 38% and looking to expand this further. This will be improved with mobility devices for front line officers and desk-top crime recording for specialist functions, such as Initial Investigation, Public

Protection and Modern Slavery.

The Force is also reviewing the 'on-line' reporting methodology, with consideration being given to increasing the offence types the public can report against. We remain committed to continual improvement of our current crime recording processes as specified within our improvement plan and it is a key objective within the PCC's Police and Crime plan.

PCC response

As previously stated I am committed to ensuring that crime is recorded accurately and promptly; ensuring victims get the support they need, bringing offenders to justice, and accurately understanding the level of threat, risk and harm that the West Midlands faces.

The question then is not the shared ambition to ensure accurate and timely crime recording, but how best to achieve this goal. Consideration of Recommendation 2 poses some issues as there is a difference between the professional view of HM Inspector of Constabulary Fire & Rescue Services and the Chief Constable of West Midlands Police. The local policing body must consider both the professional judgement of a Chief Constable (who is locally and publicly accountable to a PCC) and the statutory authority of the Chief Inspector of Constabulary (who is not). Given the statutory power of HMICFRS to make global, comparative assessments of Force performance, each recommendation must be treated with the utmost thoroughness. Equally, recognising the professionalism and operational independence of the Chief Constable, it would be unreasonable for a local policing body not to have regard to the views of a Chief Constable in these circumstances.

It is important to note at this point that WMP already recognise the benefits of recording at the first point of contact. Since the introduction of a new operating model at the end of 2016 27% of all crime has been recorded at the point of call. HMICFRS assess that the accuracy of recording at point of call (Directly Recorded Crime) in WMP is 97% and I have reassurance from WMP that they are looking to record still more crime at point of call/contact, e.g. theft offences. I have asked my office to monitor their performance in this regard.

To comprehensively review and change the operating model and record substantially more calls at first point of contact, even where "sufficient information" exists to do so, would, given the huge volume of calls WMP receive on a day-to-day basis, require a substantial shift of resources into Force Contact and, therefore a reduction in resource for other parts of the force. While this might affect crime recording data it could also have a significant impact on the overall service provided by West Midlands Police and the risk is this would lead to an overall deterioration rather than improvement in service to victims and communities.

HMICFRS is not concerned with the total resources available to policing, let alone the resources available to an individual Force and how these are allocated to priorities; it is their duty to inspect compliance with standards. The role of a local policing body is wider than that of HMICFRS. It must concern itself with the total available resources and the alignment of these to the priorities set in the Police and Crime Plan. The resources that are made available to West Midlands Police are based on two factors. First, government

grant. Unfortunately, we do not receive the share of government grant the national funding formula says we should, losing over £40m last year. Thus we receive about 10% less from government to meet our responsibilities than the national formula says we need to fulfil those responsibilities. HMICFRS makes its recommendations untroubled by this unfair and enduring reality. Second, precept. Again, despite successive PCCs raising precept every year since 2012, West Midlands Police receives the second lowest amount from precept of any Force in England and Wales as a share of its total budget. This is a historic legacy that reaches far back into the days of the Police Authority, and of course also means we feel the effects of central grant cuts – which have totalled £145 million since 2010 - more keenly than our peers. Again, all this is 'out of scope' for HMICFRS. It is no coincidence that West Midlands Police is relying on £18m from reserves to balance its budget this year.

Given these circumstances, the West Midlands PCC must consider carefully and weigh competing operational advice concerning the resource implications of this HMICFRS recommendation and how to deliver the most efficient and effective police service possible within the bounds of the resources available. On the one hand, HMICFRS is advising a given operational method, based on a contested ideal of 'best practice' without consideration to the resource implications of the recommended approach. On the other hand, the Chief Constable is weighing recommended operational practice against both the wider resource implications to the organisation and the potential benefits both operationally and for the public - which are, in his professional view, limited. This is not an easy calculation, but it would seem evident that the Chief Constable is basing his view both on professional judgement - and there is no reason to question the quality of that judgement - and a wider calculus that includes the resources available to West Midlands Police, operational performance gain and implications for the wider public. In these circumstances, the Chief Constable's view, and response to this recommendation, are self-evidently reasonable.

My office will therefore follow the implementation of the force's CDI improvement plan and monitor accuracy of crime data recording as assessed by ongoing internal audit. Whilst I hope that this will see real improvements to recording, and therefore to victims, if such improvement are not achieved I will revisit this issue, and any other learning that comes from this national programme of inspections, to seek further change.

Recommendation 3

Within three months, the force should develop and implement procedures for the effective supervision of crime-recording decisions throughout the whole force.

WMP response:

An overhaul of the approach to CDI audits has meant that supervisors are now much more involved in checking CDI compliance and resolving errors. A key component of the WMP CDI Improvement plan is the active engagement of supervision with the internal

incident log audits. The audit results are quality assured, then fed back to each department and supervisors provide individual feedback to officers / staff with regards to any error.

This inspection recommendation was considered at the force Crime Governance Board and performance analysts were tasked to identify a supervisory footprint on all open investigation logs. Results ranged from 71.8% to 80.0%, demonstrating a much increased rate of supervisor entry on open investigations and active management of crime reports. Unfortunately, WMP cannot carry out the same analysis for incident logs as the Oasis system is not configured for that type of data retrieval. This, however, should be addressed through the new Control Works system.

The Crimes Services Team (CST) supervision now actively manage all N100 Reported incidents of Rape and review non-crime records (Domestic Abuse, Child Abuse, Vulnerable Adult). The results are fed back to the relevant department and individual feedback is given to the officer concerned and their supervisor.

PCC response

My office and members of the Strategic Policing and Crime Board will review progress against the WMP CDI improvement plan actions around training to ensure these actions are fulfilled and will meet with the FCR and Deputy FCR on a bi-monthly basis to review audit findings and ensure improvements are being seen in crime recording practice.

Recommendation 4

Within six months, the force should put in place arrangements to ensure that:

- at the point of report, particularly in domestic abuse cases, greater emphasis is placed on the initial account of the victims;
- where more than one crime is disclosed within an incident record, or identified as part of other recorded crime investigations, these are recorded.

WMP response:

In addition to the HOCR NCALT training package, the Audit & Compliance Team has produced additional HOCR PowerPoint training which specifically covers both points. This is delivered through face-to-face training for the different teams within the five Core Departments. Real case examples are used to enhance the training and engage the audience.

This has also formed part of the internal crime recording messaging which appears as Lock Screens on the WMP Desktop computers. These will also be included within the revised Crime Recording Communications Plan developed by Corporate Communications and the FCR.

The regular audit of Domestic Abuse incidents will continue and the focus on accurate

crime recording is still a clear mandate for the PCC and Chief Constable. Additionally, the force plans to deliver the College of Policing recommended DA Matters training programme to Response and Neighbourhood officers through 2019/20. DA Matters is academically evaluated and shown to increase both empathy with victims and understanding of the dynamics of domestic abuse.

PCC response

In my Police and Crime Plan I made clear that domestic abuse will not be tolerated and that I expect the force to continue to improve its knowledge of this crime and to work with partners to intervene and protect victims. The force are required to report on a regular basis to my Strategic Policing and Crime Board on their approach to hidden crimes, including domestic abuse, and further to this I will be requesting from the force an in-depth discussion on our approach to domestic abuse with members of my office and Strategic Policing and Crime Board.