

Report from the Police and Crime Commissioner for Dyfed-Powys to the Dyfed-Powys Police and Crime Panel

Crime Data Integrity, June 2021

Introduction

On 6th May 2021, the Police and Crime Commissioner was notified by Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS) that they would be publishing a Cause of Concern in relation to Crime Data Integrity (CDI) on 7th May 2021.

This action, known as an Accelerated Cause of Concern, is taken when HMICFRS "discover significant service failures or risks to public safety".

They stated that Dyfed-Powys Police had failed to make expected improvements since its last Crime Data Integrity inspection in 2018:

"Dyfed-Powys Police is too often failing to record reports of violent crime, particularly domestic abuse and anti-social behaviour towards people."

It was recommended that the force should immediately:

- take steps to identify and address gaps in its systems and processes for identifying and recording all reports of crime (giving particular attention to domestic abuse-related violent crime); and
- put in place arrangements to make sure that adequate supervision is applied to crime-recording decisions made by officers and staff.

And within three months the force should:

- provide specific training for all supervisors, officers and staff who work in crime recording roles. This training should include the crime recording requirements for violent crime, including domestic abuse and anti-social behaviour (personal).

As part of the new Victim Service Assessment inspection regime, HMICFRS reviewed 597 crime related incidents recorded between August and October 2020.

The Force reported that out of 160 domestic-related violence against the person incidents audited by HMICFRS, 21 crime records were identified as missing. The majority of these were identified as 'behavioural crimes' such as stalking, harassment or controlling and coercive behaviour. The Force has confirmed that in 16 of these cases, the victim had received support through an associated crime or DASH risk assessment.

HMICFRS found 5 out of a required 16 crimes were recorded within 50 ASB incidents. The Force now audits all of its ASB incidents, recording each missed crime as it is found. The Force reports that the vast majority of ASB incidents do result in the victim receiving a service from DPP.

The T/CC has established a strategic command structure to fully understand all crime recording, incident allocation and supervision issues, and as part of this work is ongoing to establish the consequences for victims of crimes which were not recorded appropriately.

Summary

1. The Police and Crime Commissioner has been repeatedly assured that increases in crime volumes has been in part due to better crime recording practices.
2. Actions relating to Crime Data Integrity have featured within Joint Annual Governance Statements, and the Joint Audit Committee have been assured from 2018 that work was ongoing to achieve the required 90% compliance.
3. Since 2017 the OPCC has made representation to the Force on 24 separate occasions regarding observations of inaccuracies, lack of detail and potential missed crimes identified through its various scrutiny activities.
4. The PCC has raised concerns in 5/7 Policing Accountability Boards between February 2019 and August 2020, as well as at Policing Board in February 2018 highlighting concern that over 75% of forces already inspected at that point had been deemed inadequate or Requiring Improvement. The Commissioner sought the Chief Constable's view on Dyfed-Powys Police's preparation for the inspection.
5. At a Policing Board meeting in October 2018, the PCC raised concern that the CDI risk was viewed too optimistically by the Force.
6. The then Chief Constable (CC) responded to the 2018 report with reassurance and that he was pleased with overall progress.
7. Auditing carried out by the Force team has repeatedly, since the 2018 report, highlighted poor compliance and common themes of crimes within crimes and timeliness of recording, among others.
8. All 3 of the DPP Force Management Statements (FMSs) to date have projected improvements in CDI.
9. Anti-Social Behaviour (ASB) compliance has improved over recent months due to changes to the Force Communication Centre script and concentrated training efforts.
10. Achieving outstanding HMIC recommendations are now considered dependent on the End 2 End (E2E) project.

Background information

“Ineffective crime recording at source” was added to the Force risk register in **February 2015**.

Inspection reports

2014 Found leadership was strong and committed to CDI, but recommended the force conduct a National Crime Recording Standards (NCRS) and Home Office Counting Rules (HOCR) Training Needs Analysis based on the new, post-Public First structure, and immediately introduce a tiered, coordinated training programme.

2018 Cause for concern

“Dyfed-Powys Police is failing to ensure it records all violent crimes (in particular domestic abuse) reported to it. In most cases where the force fails to record domestic abuse crimes, officers and staff do not complete domestic abuse, stalking and harassment (DASH) assessments. There is also limited supervision to correct these recording decisions at the earliest opportunity.”

Recommendation

The force should immediately:

- take steps to identify and address gaps in its systems and processes for identifying and recording all reports of violent crimes (in particular those that are domestic abuse-related);
- ensure officers and staff complete DASH assessments in all domestic abuse cases;
- ensure that adequate supervision is applied to all crime-recording decisions made by officers and staff; and
- ensure that all identified crimes are recorded without delay and in any case within 24 hours.

Areas for improvement

The force should make sure that it:

- records all reports of crime made by a professional third party acting in a professional capacity on behalf of the victim;
- records all counter allegations as crimes or explains why it has not done this;
- develops and operates effective procedures to supervise crime-recording decisions throughout the force;

- takes immediate steps to make sure that it records all reported crimes of rape without delay and that it uses classification N100 correctly; and
- improves how it collects diversity information from crime victims and uses this to inform its compliance with its equality duty.

2020 Accelerated cause for concern

"Dyfed-Powys Police is too often failing to record reports of violent crime, particularly domestic abuse and anti-social behaviour towards people."

Recommendations

The force should immediately:

- take steps to identify and address gaps in its systems and processes for identifying and recording all reports of crime (giving particular attention to domestic abuse-related violent crime); and
- put in place arrangements to make sure that adequate supervision is applied to crime-recording decisions made by officers and staff.

Within three months the force should:

- provide specific training for all supervisors, officers and staff who work in crime recording roles. This training should include the crime recording requirements for violent crime, including domestic abuse and anti-social behaviour (personal).

	2014	2018	2020
Incidents reviewed	109	1,372	597
Crimes required	73		528
Crimes actually recorded	50		461
% compliance	68.5%	87.8%	87.6%
VAP compliance		84.4%	85.4%
Sexual offences compliance		93%	
DA compliance		81.1%	

OPCC Oversight

Joint Audit Committee (JAC)

- **September 2018** – the Committee was encouraged by action taken against the crime recording risk.
- The Chief Constable reported in **November 2018** that the imminent CDI report would detail a considerable improvement in compliance rate. It was recognised that further improvements need to be made and as such the PCC queried whether the risk should be elevated. The CC stated weekly scrutiny was being undertaken to strive for 95% compliance levels.
- JAC were reassured in **March 2019** that work was ongoing to achieve 90% CDI compliance.
- Police National Computer recording delays were highlighted as increased risk in **July 2019**, but reassured that DPP were in similar position to other forces.
- Members queried in **October 2020** why the CDI risk score was increased from 14 to 16. It was reported as being done in January in response to feedback from HMICFRS at the end of 2019.
- Members were informed in **March 2021** that they would see significant progress being made against the CDI risk with the E2E project.
- HMICFRS Areas for Improvement, data quality and data integrity actions have featured within the Joint Annual Governance Statements **since 2017**.

Policing Accountability Board (PAB)

- A report to PAB in **May 2018** stated an Internal Audit Compliance Review of crime recording in 2018 provided “reasonable assurance”, but noted issues with data integrity. In relation to preparation for the inspection, the report stated “there have been significant improvements in addressing CDI issues...” but concluded...“Whilst CDI issues are being addressed, this is against a background of failing to address some of the key issues identified in 2014.
- DPP were graded as ‘not compliant’ for crime data integrity in **February 2019**, with a rating of 88% against the required standard of 90%. The temporary Deputy Chief Constable (T/DCC) stated that DPP consistently score well with crime data integrity for high level crime types, however they score lower with lower level crime and domestic incidents. A potential reason for lower scores was that crimes are lost between coming through to the Force

Communication Centre (FCC) and being tasked to an officer. The T/DCC stated that the situation would be addressed by the Vulnerability Desk.

- The PCC queried in **May 2019** whether the Force should request that HMICFRS come in to review a particular aspect of policing following a period of development within a department such as introducing the Vulnerability Desk. The T/DCC stated that HMICFRS had been invited to review and quality assure developments to Neighbourhood Policing and the Vulnerability Desk in October 2019.
- The PCC queried in **November 2019** whether DPP were improving their Crime Data Integrity practices alongside a plateauing of crime recording levels.
- The DCC raised concerns in **February 2020** that the sample size provided to the HMICFRS CDI audit was small, at 60 out of over a thousand calls.
- The PCC raised concern in **August 2020** that CDI was not improving. The DCC reassured that the Crime Recording Team would support the improvement of crime data integrity levels and review accurate outcome recording.

Policing Board (PB)

- A paper went to PB in **February 2018** setting out a series of questions in relation to CDI, highlighting concern that over 75% of forces already inspected had been deemed inadequate or Requiring Improvement. The PCC sought the CC's view on DPP's preparation for the inspection.
- The PCC raised concern in **October 2018** that CDI risk was viewed too optimistically by DPP.
- In **December 2018**, a briefing to the PCC following the release of the inspection report advised that the PCC:
 - Seek assurance from the Chief Constable that a robust supervision and audit schedule / processes are in place and achievable.
 - Discuss how OPCC's scrutiny activity might verify the effectiveness of such schedule / processes.

The CC responded with:

"I am pleased with the overall progress the Force has made with crime recording..."

The recommendations of the HMICFRS inspection, as detailed below, will be implemented in full and monitored by the Assistant Chief Constable, under the Strategic Crime Recording User Group...

I can provide reassurance that work has commenced on these areas, some of which was in place prior to the publication of the report, specifically the recommendations with particular focus on domestic abuse cases...

As a force, we are committed to improving our performance in this area."

- **In September 2019** an update on the Vulnerability Desk stated that a particular review had been undertaken of how DPP handles so-called 'hidden crime' such as stalking & harassment and coercive control, with increases of 260% and 360% reported.
- The Temporary Assistant Chief Constable (T/ACC) assured the PCC in **March 2021** that subtle governance structural changes would ensure line of sight to monitor CDI of ASB reports.

OPCC Scrutiny

- **Since 2017**, the Quality Assurance and Out of Court Disposal Scrutiny Panels have, on 15 and 7 occasions respectively, made representation to the Force relating to observations of inaccuracies, lack of detail and potential missed crimes within a variety of crime, call, complaint and use of police powers records.
- In **2018**, the Use of Force deep dive raised concerns regarding recording practices.
- In **2019**, the Victim Withdrawal deep dive recommended the Force considered a centralised outcomes quality assurance mechanism and a central repository for the management and accountability of recommendations.

Force governance meetings attended by OPCC

Strategic Crime Recording Users Group (SCRUG)

- In **November 2018** the introduction of NCRS & HOCR 1 hour training input and supervision plan for NCRS failure feedback loop & rectification was confirmed.
- Common themes emerging from crime audits identified were as follows:

Nov 2018	Jan 2020	Jul 2020
Crimes within crimes	Crimes within crimes	Crimes within crimes
N100s		Rape & N100s
	Recording crimes with course of conduct	Recording crimes with course of conduct
	3rd party reports	3rd party reports
Timeliness		Timeliness
Lack of scrutiny by CRB		
Ping-pong between CRB and officers.	Ping-pong between CRB and officers	

- In **March 2019** Crime Audit highlighted the Home Office suggested audit sample size and the gap in what could be achieved with current staffing levels. Chief Officers and the Crime Recording User Group had agreed to continue with severely reduced auditing.
- The Force Crime Registrar (FCR) reported in **July 2019** that timeliness compliance was under 80%.
- It was reported in **January 2020** that the Force wished to introduce telephone recording from summer 2020 and recording at point of contact simultaneously with the new Record Management System launch. NCRS compliance was reported as improving but samples were not statistically significant - only 60 per month audit - 15 per Basic Command Unit.
- **July 2020** audits confirmed no significant improvement in CDI had been made since 2018. All areas apart from Domestic Abuse Stalking and Harassment (DASH) risk assessments were found to be unsound or poor by NCRS judgments. The Group agreed to focus on two quick wins – timeliness & course of conduct. A process was established to record missing crimes identified in audits.
- It was reported in **January 2021** that outstanding HMIC recommendations were dependent on the E2E project. ASB data was showing improvement through focused work.
- The T/ACC stated in **April 2021** that a significant number of crimes outstanding found from audits which needed to be recorded needed to be completed by the next (monthly) meeting.
- HMICFRS feedback was reported as being due to cultural issues, timeliness and accuracy.
- It was confirmed that crime audit were reviewing 100% of rape, N100, STORMS with “rape” and ASB-Personal records, as well as recording any missed crimes as they were found.

HMIC Governance Group

- **November 2018** - Suggested CDI may be introduced into everyone's Development Assessment Profile (DAP) for 2019/20.
- **May 2019** – it was confirmed that NCRS, PROTECT & DASH were the focus on the Force audit plan. DASH compliance and data quality had improved over the previous two months, but the timeliness issue was ongoing.
- **July 2019** – the main concern highlighted was the little time allocated for CDI within frontline training.
- **August 2019** – reported no improvement in recording apart from in domestic abuse and vulnerability.
- **September 2019** – reported that the July audit showed 100% DASH compliance. Timeliness continued to be an issue, with the FCR conducting a piece of work to try to understand why the Force were consistently in high 70s / early 80s % compliance.
- It was reported that a Raising the Standards of Investigations task and finish group was established in **July 2019** to look at supervision, handover and investigation plans.
- NCRS compliance continued to be identified as a high risk to the Force in **October 2019**, with no improvement since the inspection in 2018. Senior managers reported to be considering implementing a central crime recording desk.
- The **2018 FMS** anticipated a change to criming at first point of contact would improve accuracy of crime recording.
- The **2019 FMS** projected an increase in scrutiny and training around CDI and subsequent improvements in crime recording.
- The **2020 FMS** anticipated that recorded crimes would increase year on year as the Force drives to achieve 100% CDI results. The E2E project was also anticipated to improve CDI further.

OPCC action since the Accelerated Cause for Concern

Benchmarking with other OPCCs

Devon & Cornwall

Following an inadequate grading in 2016, regular meetings between the OPCC Chief Executive, Deputy Chief Constable and FCR were held to oversee actions being taken to address gaps in performance. Since receiving a good grading in 2018, the OPCC receives occasional reports on CDI to their PB equivalent.

Cumbria

Their OPCC receive thematic presentations at their PAB equivalent. To inform the presentations, a Terms of Reference is developed, setting out what information the PCC requires to enable him to gain assurance in relation to the area of policing being discussed. These terms incorporate recommendations and areas for improvement made by HMICRS, which would include any CDI related concerns.

The OPCC Team also attend some Force governance meetings to provide insight into how the Force is recording its data.

The following 3 OPCCs have approaches similar to Dyfed-Powys':

Surrey

Have a standing invitation to their SCRUG equivalent, attending occasionally but receiving all agenda, papers and minutes. Also attend Strategic Risk & Learning Group which looks at all risks across the organisation, where any CDI risks would also get escalated to.

Avon & Somerset

Their FCR gives direct 1:1 briefings to the PCC.

Sussex

Mainly oversee through their PAB equivalent.

The following three established specific measures in response to negative HMICFRS inspection reports:

Lincolnshire

The [PCC set up an independent scrutiny panel](#) to oversee remedial activity required after their 2018 inadequate grading. The Panel was closed after they received a good grading a year later.

The 'Independent Crime Recording Confidence Panel' consisted of:

- Independent Chair of Force Ethics Committee (Chair)
- Independent member of P&C Panel (Deputy Chair)
- CEO of OPCC
- Chair of JAC
- Local University Law & CJ Professor

- Representatives from 3rd sector organisations impacted
- Panel Advisor – Accredited FCR from neighbouring force.

It was established to ensure:

"that the public could have confidence that regardless of HMICFRS compliance, the Force was acting in the best interests of the public and importantly ensuring victims of crime were receiving the service they deserved..."

"It was unclear how the crime recording processes by Lincolnshire Police were having an impact on crime statistics and, more importantly, the support given to victims and the perception of the Force with the public."

It sought to balance the HMICFRS quantitative data with qualitative data – looking at what happened, why and what should happen next – *"finding a narrative and giving context to the statistics in the report"*.

It provided insight into the impact on support services:

"Internally, the Force had seen little response from the Public and therefore reasonably assumed that there had been minimal impact on the communities of Lincolnshire. When speaking with 3rd Sector workers, it became clear that this was not the case and in fact the report, the media attention and interviews had not only impacted heavily on vulnerable victims in particular, but it had increased demand and pushed it away from Policing, on to the 3rd Sector organisations."

Gloucestershire

Received an inadequate grading in 2019, following which the PCC issued a formal written holding to account notice to the CC requesting sight of the Force's improvement plan.

They report similar system issues to DPP, in terms of a multitude of systems not "talking to each other" and are in the process of moving towards the Niche Records Management System.

CDI became a standing agenda item on their PB to continue to hold the CC to account on their improvement plan.

They did see their NCRS compliance raise to 95%, but this was from redirecting frontline officers into their crime recording team, which was not sustainable.

The OPCC also contacted their commissioned services to seek feedback on any impact felt from delays in recording crimes.

Greater Manchester

Within 6 days of a HMICFRS report published on 10th December 2020 which deemed their service to victims of crime “a serious cause of concern”, Greater Manchester’s Mayor and Deputy Mayor set out a series of actions:

1. Sought additional HMICFRS support;
2. Increased capacity of their central recording and resolution unit to audit crime screening decisions, prioritising DA & rape;
3. Gold structure & taskforce to focus on delivery of their action plan, which includes OPCC representation;
4. Deputy Mayor reviews progress weekly & Mayor updated regularly, with monthly reviews with the taskforce; and
5. Set up a dedicated ‘safety net service’ - a hotline supported by Victim Support, for victims who wish to make a complaint or report concerns about their treatment. They planned to have a senior officer to review these calls as well as Victim Support staff offering advice and support to the victims.

Recommendations from the OPCC to the PCC

That the PCC considers initiating an independent scrutiny panel similar to that of Lincolnshire specifically to oversee CDI progress and look into the impact on the public

And / or

That the PCC considers establishing some form of ‘safety net service’ for victims who feel they have been affected by their crime not being recorded.

Holding the T/CC to account

At a Policing Board meeting on 20th May 2021, the PCC received a report from the T/CC setting out the Force’s actions since the inspection period.

Within the report, the T/CC recognised that the Force has not always made the appropriate and proactive steps to improve and that a cultural change was required throughout the organisation. As such, an evolving action plan has been developed, focusing on:

- communications;
- learning and development;
- quality assurance and audit;
- governance; and

- process improvements.

Recommendations from the Accelerated Cause of Concern	Corresponding actions within the Force's CDI action plan
take steps to identify and address gaps in its systems and processes for identifying and recording all reports of crime (giving particular attention to domestic abuse-related violent crime);	<ul style="list-style-type: none"> • 100% audit of ASB-Personal, Behavioural Crimes (Disorder, Harassment and Controlling & Coercive Behaviour, N100 and Hate crimes • Recognition of need to 'close the loop' to provide and act on individual and thematic feedback • Amendment to crime recording processes
Provide specific training for all supervisors, officers and staff who work in crime recording roles. This training should include the crime recording requirements for violent crime, including domestic abuse and anti-social behaviour (personal).	<ul style="list-style-type: none"> • FCR inputs to: Crime Recording Bureau, newly promoted Sergeants and Inspectors and the Secondary Risk Assessment Unit • Weekly CDI dial-ins with the FCR • Considering investment in Lincolnshire's 'NCALT' online learning package
Put in place arrangements to make sure that adequate supervision is applied to crime-recording decisions made by officers and staff.	<ul style="list-style-type: none"> • Monthly SCRUG and sub-group meetings • Chief Inspector CDI Tactical lead identified to support the FCR
	<ul style="list-style-type: none"> • Plan to appoint learning and development single point of contact to lead on feedback & learning relating to CDI, to link in with CDI Tactical lead
	<ul style="list-style-type: none"> • Each Basic Command Unit is expected to review their incident list at their Daily Management Meetings and allocate messages approaching 24hr compliance

The OPCC is represented at the fortnightly Gold crime recording, incident allocation and supervision group chaired by the T/CC and the monthly SCRUG, where the T/ACC oversees progress against the CDI action plan. The same representative also attends monthly Gold group meetings of the End 2 End project. The OPCC is currently working with the Force to

determine the most appropriate and proportionate scrutiny in order to provide the PCC with the necessary assurance on the Force's actions to improve.

Appendices



DPP PCC CoC letter



Press release -
embargoed press releDyfed-Powys Police c: