

**From:** Matthew Scott, Kent Police and Crime Commissioner  
**To:** Kent and Medway Police and Crime Panel  
**Subject:** HMIC Reports on Crime Data Integrity and Vulnerability  
**Date:** 20 July 2017



## **INTRODUCTION:**

1. Her Majesty's Inspectorate of Constabulary (HMIC) independently assesses and reports on the efficiency and effectiveness of police forces and policing. HMIC is independent of the Government and the police. In preparing reports, Inspectors ask the questions which citizens would ask, and publish the answers in an accessible form, using expertise to interpret the evidence and make recommendations for improvement. It is for Chief Constables, Police and Crime Commissioners (PCCs) and, in extreme cases, the Home Secretary to take action as a result of HMIC's recommendations.

## **CRIME DATA INTEGRITY**

### **Previous crime recording inspections in Kent**

2. In February 2013, the previous PCC commissioned HMIC to conduct an inspection to determine whether the people of Kent could have confidence in the force's crime figures. HMIC's findings were that Kent Police was recording approximately 90% of crime correctly, that more than 25% of no-crime decisions were incorrect and that the force had a target-driven culture. HMIC's judgment was that 'appreciably more needed to be done before the people of Kent could be confident that the crime and resolution figures published by the force were as accurate as they should be'.
3. An interim report published in January 2014, found that Kent Police was recording 96% of crime accurately, and that there was a high standard of decision making in relation to no-crimes. The force had also moved away from a target-driven performance culture to one that was focused on outcomes and quality of service. HMIC's judgment was that the force had made significant improvements over the period but that they would need to be sustained over a longer period of time before the people of Kent could be confident in the crime and resolution figures published by the force.
4. A third inspection of crime data integrity published in November 2014, found that Kent Police was recording 96% of crime accurately and that the high standard of decision making on no-crimes had continued. HMIC also found no evidence to suggest any remaining pressure to meet numerical performance targets. HMIC therefore concluded that the people of Kent could have confidence in Kent Police's crime figures, although the force needed to continue to make improvements and maintain focus to ensure the continued accuracy of crime recording in Kent.

### **Crime Data Integrity inspection 2017**

5. Unfortunately, HMIC's latest inspection – [Kent Police: Crime Data Integrity inspection 2017](#) - published in June 2017, found that Kent Police has not maintained the standards of accuracy reported in November 2014. Based on the examination of crime reports for the period 1 June to 30 November 2016, HMIC estimates that the force fails to record over 24,000 reported crimes each year. This represents a recording rate of 83.6%. A summary of HMIC's report is attached as Appendix A.
6. HMIC commented that:  
*"This regression from the force's previous high standards of crime-recording accuracy is disappointing. Improvements must be made. In particular, we consider that there are too many failures to make the correct crime-recording decision at the first opportunity. These failures are often due to an insufficient understanding of crime-recording requirements by officers and staff, compounded by limited supervision to correct these decisions at the earliest opportunity."*
7. HM Inspector of Constabulary Zoe Billingham stated:  
*"The force had taken its eye off the ball as a result of poor supervision of crime-recording decisions and inconsistencies in its own auditing system that was giving it 'false positive' results. In other words, the force thought it was still doing the right thing whereas in reality its crime recording standards were slipping and this was not being detected though its own checking mechanisms."*

*Too often the correct crime-recording decisions were not being made at the first opportunity. We found that some rapes and other sexual offences including domestic abuse crimes were being actively investigated but had not been properly recorded.”*

8. Commenting on the report, the PCC said:

*“The findings are unacceptable. I welcome HMIC’s independent report on this matter as it has highlighted some serious issues that needed to be resolved as a matter of urgency.*

*What this shows is that really vulnerable victims of crime were not always getting the service that they should rightly expect... I will continue to monitor progress closely.*

*I have put victims and vulnerable people at the heart of my Police and Crime Plan and have been holding the force to account in public at every opportunity to ensure that they get the support they need.*

*What this report should not be is a reflection on the frontline officers and staff within Kent Police who I know will be disappointed too, and who will be continuing their focus on keeping our county safe.”*

### **Force response**

9. The Chief Constable has apologised to any victim who did not receive the service they were entitled to and approved a comprehensive Kent Police improvement plan. Progress reports are provided weekly to the Deputy Chief Constable.

10. Activity to date is summarised below:

- All crimes that failed audit have been quality assured to make sure that a proper investigation into the allegation took place, and that safeguarding issues were appropriately attended to.
- The Data Audit Team has received immediate additional training in respect of the National Crime Recording Standards and Home Office Counting Rules. This will be supplemented by one weeks training which will be delivered by HMIC auditors.
- The force has suspended the practice of allowing the Deputy Force Crime and Incident Registrar to be seconded to HMIC, until a state of normality is established within the data audit function.
- Three temporary data audit positions have been made permanent (through the realignment of posts).
- The Audit Calendar has been presented to Chief Officers for approval, and all areas reviewed by HMIC will now be subject to audit in order to identify failings earlier.
- The Crime Data Integrity (CDI) Improvement Board Terms of Reference, and the Tactical Recovery Plan have been ratified by Chief Officers, and the Recovery Plan, incorporating all HMIC’s recommendations and other actions, is being progressed.
- HMIC CDI recommendations are being managed through the CDI Improvement Board, and updates on progress reported monthly to the Chief Constable and the Director of Corporate Services.
- Terms of reference for the Change Team have been approved by the Chief Constable to develop costed crime management options, in light of HMIC’s findings.

11. Since the plan was implemented, significant improvements in crime data integrity have already been made, and an upward trajectory is being maintained. This is supported by comments made by HM Inspector of Constabulary Zoe Billingham at the time of publication:

*“Since our inspection in March 2017 I have been in close contact with Kent Police and I am encouraged by the immediate steps that the force has taken to rectify the situation. It has appointed a new head of crime recording and investigative standards, as well as increasing staff in its audit unit. I am told, by the force, that its levels of crime recording accuracy have been restored to close to those we found three years ago.”*

12. However, this will need to be verified by HMIC when the PCC invites them back.

### **Holding to account**

13. Victims and vulnerable people are at the heart of the PCCs [‘Safer in Kent: The Community Safety and Criminal Justice Plan’](#). As a result, the PCC considers the findings totally unacceptable.

14. Whilst the PCC welcomes the independent report, as clearly there are times when forces cannot get it right when they are auditing their own work, it highlights some serious issues that Kent Police must resolve as a matter of urgency.
15. However, the PCC has been advised that:
- in a number of instances where the crime was not recorded, the force had responded to the victim's needs, conducted an effective investigation and safeguarded the victim;
  - all those crimes that failed audit have subsequently been quality assured;
  - officers and staff approach crime recording in a positive and ethical way and have no desire to under-record crime; and
  - the force is working closely with HMIC to ensure all of the issues that led to crimes not being recorded are addressed.
16. Crime Data Integrity was discussed at the PCC's Governance Board on 1 March 2017 and subsequently at the Performance and Delivery Board on 7 June 2017.
17. In terms of oversight, Mr Harper, the PCC's Chief of Staff and importantly, former Force Crime and Incident Registrar (FCIR), receives all CDI Improvement Board papers and has a standing invitation to attend. Having played a pivotal role in improving crime recording accuracy following HMIC's 2013 inspection, Mr Harper has significant experience, as well as technical knowledge of Kent Police's crime recording systems and processes. Mr Harper also meets with the recently appointed FCIR on a monthly basis to discuss progress.
18. Whilst the PCC has been assured that victims who contact Kent Police today would not receive the same level of service that they received before March 2017, he will continue to monitor progress closely.
19. Clearly, Mr Harper is able to provide the PCC with a unique perspective on progress, but the PCC will also continue to hold the Chief Constable to account via their weekly one-to-one meetings and also in public at future Performance and Delivery Boards.
20. In addition, the PCC will be asking HMIC to conduct a further inspection as soon as is appropriate to make sure the force is getting it right.

## **VULNERABILITY**

### **Police effectiveness 2015 (Vulnerability)**

21. As part of its annual inspections into police effectiveness, efficiency and legitimacy (PEEL), HMIC's 2015 effectiveness programme assessed how well forces keep people safe and reduce crime. Within this programme, HMIC's vulnerability inspection examined the overall question, 'How effective are forces at protecting from harm those who are vulnerable, and supporting victims?'
22. HMIC considered how forces respond to and support missing and absent children and victims of domestic abuse (DA), and assessed how well prepared forces are to respond to and safeguard children at risk of sexual exploitation. The report was published in December 2015.
23. HMIC judged Kent Police as 'Requires Improvement' as there were some important areas where improvement was needed to ensure the service was consistent and that vulnerable people, particularly children, were kept safe. The force had the lowest charge rate in England and Wales for DA and needed to understand all the factors fully to ensure that outcomes for victims were appropriate. HMIC found that frontline officers' knowledge of how to identify the risk factors associated with child sexual exploitation (CSE) was limited and that the force needed to ensure greater understanding and management of CSE by officers and staff.

### **Force response**

24. Prior to the report being published, and based on verbal feedback at the conclusion of the inspection, the force conducted an immediate review of the areas requiring improvement to establish the issues and action required. This was reported to the Protecting Vulnerable People (PVP) Board.

25. As a result, force key activities included:

- Changing the Force Control Strategy so CSE and DA were top priorities.
- Implementation of a dedicated multi-agency CSE Team.
- Comprehensive training package for all frontline staff on key areas of PVP.
- Completion of national CSE awareness training by all frontline staff.
- Enhanced resources to identify and tackle online abuse of children.
- Development of a multi-agency CSE operational response to increase partner agency intelligence flows and referrals (Op Willow).
- Enhanced training on Domestic Violence Protection Notices and Claire's Law.
- Changes to the Case File Quality matrix to capture Victim Code compliance and Victim Personal Statement completion as well as ensuring victim vulnerability was recognised throughout case progression and into the criminal justice system.
- Production of an analytical report regarding DA performance across the force.

26. The force also visited Sussex, Durham, Greater Manchester, Derbyshire, Merseyside, Norfolk, Lancashire, Thames Valley, Gwent, Dorset, Cheshire and Northumbria, who were all graded as 'Good' to ensure best practice was understood.

### **Update - Police effectiveness 2016**

27. As part of its PEEL: Police effectiveness 2016 inspection, HMIC re-assessed 'How effective forces are at protecting from harm those who are vulnerable, and supporting victims?'. The report was published in March 2017.

28. HMIC found that Kent Police had improved from the previous inspection, and judged the force to be 'Good' at protecting those who are vulnerable from harm, and supporting victims.

29. In summary, HMIC stated:

*"Frontline officers' knowledge and understanding of child sexual exploitation has greatly improved. They understand the link between missing children and sexual exploitation, and all frontline staff we spoke to have received training and direction on the subject. The service provided to vulnerable people, particularly children, is now consistent across the force. The force's paedophile online investigation team is highly effective and is making Kent a more difficult place for paedophiles to operate in.*

*The force has expended time and effort in reflecting on its domestic abuse response and the reasons for its low arrest and charge rates, and has given clear direction and guidance to officers that have resulted in a rapidly improving rate of arrest and charge/summons levels for domestic abuse cases. The force is clearly improving in how it responds to opportunities to intervene positively in domestic abuse cases to reduce risk to victims and hold offenders to account for their actions."*

30. Protecting vulnerable people from harm is one of the Guiding Principles in the PCCs '[Safer in Kent: The Community Safety and Criminal Justice Plan](#)'.

31. Whilst reassured by HMIC's assessment, the PCC will continue to engage with organisations that support victims of crime and help the most vulnerable to gauge the effectiveness of Kent Police's approach, as well as service provision. He will also continue to hold the Chief Constable to account via their weekly one-to-one meetings and in public at the Performance and Delivery Board.

## Kent Police: Crime Data Integrity Inspection 2017 Summary of HMIC's report

### **Overall judgment: Inadequate**

Kent Police has failed to maintain the improvements to crime-recording accuracy reported in HMIC's 2014 Crime Data Integrity inspection report. The force is currently under recording too many reports of crime, including violent crimes, reports of rape, and other sexual offences.

The force needs to act promptly to improve the accuracy of its recording of these reports and to provide all victims with the service to which they are entitled and deserve.

However, HMIC found that:

- officers and staff are placing the victim at the forefront of their crime-recording decisions;
- the force has worked hard in bringing about improvements in the use and scrutiny of out-of-court disposals among officers and staff; and
- its victim support hub is well-established, providing those victims who get their crime recorded with access to support services to which they are entitled.

### **How effective is the force at recording reported crime: Inadequate**

- Overall, 83.6% of reported crime recorded; HMIC estimates over 24,000 reports of crime not recorded.
  - *The force has considerable work to do in order to ensure it records all reports of crime in accordance with the Home Office Counting Rules (HOCR).*
  - *The force has taken immediate steps to develop and implement an action plan designed to address problems.*
- 79.2% of reported violent crime recorded; HMIC estimates over 10,000 reports not recorded.
  - *As violent crime can be particularly distressing for the victim, this is an area in which the need for improvement is particularly acute.*
- 90.2% of reported sexual offences (including rape) recorded; HMIC estimates over 400 reports not recorded.
  - *The failings are significant given the very serious nature of sexual offences and harm they cause to victims.*
- 102 out of 112 reports of rape recorded.
  - *As rape is one of the most serious sexual offence crimes, the accurate recording of such reports is especially important as it helps ensure victims receive the service they have a right to expect and deserve.*
  - *HMIC found that Kent Police provided support and safeguarding in all ten cases not recorded, including referrals to partner organisations when appropriate.*

### **How efficiently do the systems and processes in the force support accurate crime-recording: Inadequate**

- 5 out of 18 vulnerable victim crimes recorded.
  - *The force must improve its recording of crimes reported directly to its public protection teams.*
  - *HMIC found that Kent Police provided support and safeguarding in all 13 cases not recorded, including referrals to partner organisations when appropriate.*
- Modern Slavery
  - *The force has identified modern slavery as a priority and has comprehensive intelligence collection plans.*
  - *Officers and staff have a good, basic knowledge of modern slavery offences and of their respective responsibilities in relation to the recording of such offences and where to find further information.*
- Timeliness
  - *HMIC found that generally, when the force makes correct crime-recording decisions, its recording procedures are effective at ensuring the crime is recorded within 24 hours, as permitted by the rules.*
- Cancelled crimes
  - *Where additional verifiable information (AVI) is obtained to show that a recorded crime did not occur, the crime record can be cancelled. In this respect, HMIC found the force has made limited progress.*
  - *Of the 19 recorded crimes of rape reviewed, HMIC found that all 19 had been cancelled correctly.*
  - *The force needs to improve in respect of informing victims of the decision to cancel their reported crime.*
- Code of Practice for Victims of Crime
  - *The force is complying with all of its responsibilities.*
  - *Kent Police, through a hub funded by its PCC, supports victims of crime. The hub is well resourced and has access to specialists from many organisations to enhance the support it provides.*
- Equality
  - *HMIC found that the force must improve its collection of information regarding crimes affecting identifiable groups within communities.*

- Officer and staff survey
  - 597 officers and staff completed HMIC's survey on their experience of crime-recording.
  - They stated that messages from the chief officer team are unequivocal that crime recording, and the victim and their voice are of the utmost importance.
  - Staff agreed they understood the need to record all crime and many believed that all crime was being recorded.
  - There was no suggestion that any pressure was put on staff to not record crime.

### **How well does the force demonstrate the leadership and culture necessary to meet the national standards for crime recording: Good**

- HMIC found that officers and staff are placing the needs of the victim at the heart of their crime-recording decisions. However, there are deficiencies in crime-recording arrangements, together with an insufficient knowledge of crime-recording requirements among some officers and staff.
- HMIC were impressed with the process to monitor out-of-court disposals, including independent scrutiny panels.
- The force took immediate positive action upon receipt of the findings. This includes the development of an action plan, improvements to the level of governance, and recruitment of additional staff to support the recording and auditing of crime reports.

### **Conclusion:**

- Kent Police's crime-recording arrangements are unacceptable.
- The force has been unable to maintain the compliance levels reported in HMIC's 2014 report. This is as a result of the failure of systems that are designed to support effective crime-recording, poor supervision of crime-recording decisions and a lack of effective audit.

### **What next:**

- HMIC expects the force urgently to make progress implementing the recommendations and is pleased to see action has already started.
- The serious causes of concern found during this inspection are such that HMIC may re-visit the force in early 2018.

### **Recommendations:**

- Immediately, the force should take steps to identify and address gaps in its systems and processes for the recording of reports of crime. This work should:
  - include a review of the quality of incident recording;
  - provide a consistent and structured approach to call-handling quality assurance processes; and
  - identify and address shortcomings in the identification and recording of reported crime by the investigation management unit (IMU).
- Immediately, the force should take steps to ensure that all reported crimes of rape are recorded without delay and that classification N100 is used correctly.
- Within three months, the force should review the use of secondary incident records when a crime has been disclosed and in particular where crimes are disclosed during the course of investigations, to ensure the use of secondary incidents does not inhibit crime-recording accuracy.
- Within three months the force should develop and implement procedures to ensure that where more than one crime is disclosed within an incident record or is identified as part of other recorded crime investigations; that these are recorded;
- Within three months, the force should develop and implement procedures for the effective supervision of crime-recording decisions throughout the whole force.
- Within three months, the force should ensure sufficient audit capacity and capability is available to the Force Crime and Incident Registrar to provide reassurance that the force is identifying and managing any gaps in its crime-recording accuracy. This is particularly important for vulnerable victims and those crimes where the risk to the victim is greatest, such as rape, sexual offences, domestic abuse and modern slavery.
- Within six months, the force should design and provide training for all staff who make crime-recording decisions. This should include training in regard to:
  - the extent of the information required to provide for a crime-recording decision to be made;
  - the expectation that reported crime is recorded at the first point that sufficient information exists to record a crime, which in the majority of cases will be at the point of report;
  - the proper use of classification N100 for reports of rape and recording crimes of rape involving multiple offenders and from third party reports;
  - offences involving the public order act, malicious communications, harassment and common assault; and
  - the additional verifiable information required in order to make crime-cancellation decisions.

### **Areas for improvement:**

- The force should immediately improve how it collects diversity information from all victims of crime and how it uses this to inform its compliance with its equality duty.