

THE CHIEF CONSTABLE OF CLEVELAND

Data Quality: Monitor and Audit Compliance Against NCRS and HOCR

Internal audit report 10.23/24

REVISED FINAL

11 January 2024

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1. EXECUTIVE SUMMARY

Why we completed this audit

As part of the agreed internal audit plan for 2023 / 2024 we have reviewed the Force's audit regime to assess whether it is in compliance with the National Crime Recording Standard (NCRS) and the Home Office Counting Rules (HOCR) and if it has appropriate mechanisms in place to ensure audit results are fed back to management.

The Force operates in line with the National Crime Recording Standards (NCRS) and the Home Office Crime Recording Rules (HOCR) to ensure a consistent approach to crime recording nationally. We obtained the NCRS and HOCR from the .gov website and confirmed this was last updated in September 2023.

We reviewed the Home Office Crime Recording Rules and identified the following crime areas which sets out how the Force should manage the recording of crimes per type; Other crimes, Violent crimes and Sexual crimes. Our testing was based upon these crime types. The HOCR details specific recording measures for general crimes, violent crimes, sexual crimes, burglary, vehicle offences, theft and other crimes. This is to ensure the appropriate action for investigation purposes are undertaken for each crime.

The Force's Crime and Incident Registrar (FCIR) is responsible for monitoring and assessing the Force's compliance with NCRS, making final crime recording decisions (typically in higher risk cases, such as murder or rape), and assist in the delivery of training across the Force in crime recording. The FCIR is responsible for managing the Quality and Compliance Team who undertake scheduled audits throughout the year in line with the HOCR and NCRS guidance. On a bi-monthly basis the FCIR compiles the summary results of the audits undertaken and presents the report to the CDI Tactical Group and the Crime Governance Group for senior management to take appropriate action.

The Designated Decision Maker (DDM) is responsible for evaluating the information and the reliability of the source and take a proportionate approach which recognises the seriousness of the allegation, and the potential impact of an incorrect decision based on that information. We were limited with the testing we could undertake during the audit as management did not wish us to duplicate sample testing completed in the 2021/22 review and, following the satisfactory results of the HMICFRS inspection, they preferred to utilise this audit to obtain assurance of how actions are reported through the governance structure. We have therefore reviewed the Force's own audit findings rather than reclassifications, transfers and cancellation of cases.

Conclusion

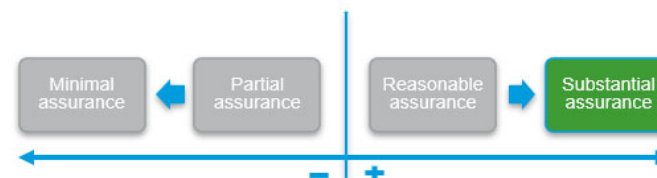
Our review established that the Force has a robust control framework in place to identify crime recording issues which do not comply with the NCRS or the HOCRs and to ensure that these are appropriately reported throughout the governance structure. As part of the testing undertaken, we highlighted that the Force senior management team has significant oversight of the audit outcomes and any themes or trends identified. We confirmed that crime recording is given a high priority within the Force and is overseen by the CDI Tactical and Crime Governance Groups.

However, we found a lapse in record keeping within the detailed feedback spreadsheet, in that staff within the Quality and Compliance Team were not updating the spreadsheet when appropriate actions are resolved within the Niche record. We discussed this with the FCIR and we noted this was raised by one individual within the team and did not pose any further risk.

As a result of our review we have agreed **one medium** and **one low priority** management actions.

Internal audit opinion:

Taking account of the issues identified, the Chief Constable of Cleveland can take **substantial assurance** that the controls upon which the organisation relies to manage this area are suitably designed, consistently applied and effective.



Key findings

We identified the following exception resulting in one medium priority action being agreed:



Action

While undertaking the audit workbook testing we identified 17 cases where the Niche records were updated to confirm the action was resolved. However, the detailed feedback sheet which is used to collate the data for the bi-monthly report was not updated.

Where the detailed feedback spreadsheet is not appropriately updated, the Quality and Compliance Team risk being unable to appropriately identify the current status of the actions they have raised. This could result in further monitoring discrepancies if they are not reported in to the CDI Tactical or Crime Governance meetings with the correct status. **(Medium)**

For details of the **low priority** action, please see section two of this report.

Our audit review identified that the following controls are suitably designed, consistently applied, and are operating effectively:



We reviewed the Terms of Reference and standard agendas for the CDI Tactical Group and the Crime Governance Group and confirmed the FCIR is the Chair of the CDI Tactical Group, which is attended by all operational Chief Inspectors and management. On a monthly basis actions and themes from the audits completed are shared and managed within the CDI Tactical Group. Where escalation is required, this is reported to the Crime Governance Group which is chaired by the Assistant Chief Constable.

We found there was sufficient evidence within the Terms of Reference and the standing agendas to ensure the FCIR has appropriate access to the senior management team to raise actions and concerns.



Through discussion with the FCIR we understood they currently operate a rolling audit schedule which is based on the audit requirements set out by the NCRS and HMICFRS. The HMICFRS audit methodology states they should consistently audit the three main offence groups: sexual crimes, violent crimes, and other crimes. This is considered within the audit schedule as per the guidance from HMICFRS and they are reviewed bi-monthly.

In addition to the audit schedule, an audit matrix is available to provide a clear visual overview of the audits due to be undertaken and when they will be completed throughout the year. We confirmed with the FCIR the audit matrix is presented on an annual basis within the CDI Tactical Group to ensure they cover all necessary areas identified.



Through discussion with the FCIR we understood there is no assessment or interview process to appoint the DDM. An individual who has undertaken the National Force Crime Registrar accreditation course is the only person who can appoint or designate a decision maker as they (the FCIR) have received the appropriate training. We understood the designated decision maker can reclassify, cancel or transfer any other crimes apart from sexual assaults and murder, the decision responsibility for sexual assault and murder related crimes are with the FCIR and their deputy.



All failures identified during the data quality audits are considered to impact on the Force's strategy as the Force aims to be 100% compliant with NCRS and HOCR when recording crimes.

We obtained the CDI Tactical Group's rolling Action Plan which outlines the agreed actions following the Group's monthly meetings. Similarly, the Crime Governance Group also has an Action and Decision Log to provide an effective audit trail of actions raised, the status of those actions and what decisions are made. We confirmed for the actions raised in the internal audit reports had appropriate action taken to complete the issues identified.

2. DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

Area: Data Quality		
Control	The operates in line with the Data Quality Assurance Manual to identify the appropriate audit criteria in line with the National Crime Recording Rules.	Assessment:
	For requested audits, a planning meeting is scheduled to fully understand the requirements of the audit and the desired outcomes.	Design ✓
	All actions are tracked within a feedback spreadsheet. The results of the audits (and any actions) are reported by the Force Crime and Inspection Registrar to the CDI Tactical Group meetings.	Compliance ×
Findings / Implications	The Force operates its data quality audits in line with the Home Office Data Quality Assurance Manual 2018. The purpose of the Data Quality Assurance Manual is to provide a comprehensive guide to allow forces to undertake their own quality assurance audits and drive for continuous improvements.	
	We reviewed the Data Quality Manual which outlines the characteristics of robust data quality, which are: accuracy, validity, reliability, timeliness, relevance, and completeness.	
	Through discussion with the Force Crime and Incident Registrar we understood the Force operates all audits in compliance with the NCRS and HOCR. As agreed within the scope of the audit, we did not re-perform the audit results and, instead, only tested to confirm whether the issues identified following the audits are reported through the governance structure to take appropriate action and confirm the issues have been rectified.	
	From the audit matrix, we chose a sample of five audit workbooks: Violent Crimes April, Other Crimes April, Sexual Crimes June, Sexual Crimes August and Violent Crimes August (all 2023). From each workbook we then chose five crimes which had been recorded incorrectly as per the NCRS and HOCR guidance.	
	Violent Crimes Audit (April - May 2023): <p>For the five sample cases taken, we confirmed an issue was identified within the audit workbook. We reviewed the feedback spreadsheet and found all five sample cases were identified and raised as an issue. Within the feedback spreadsheet we further identified in four cases the action was resolved. In the remaining case there was no confirmation in the feedback spreadsheet of whether this action was unresolved or resolved. However, when we tested to confirm the actions were resolved in Niche, all five had been appropriately updated on the Niche record. The final test we completed was to confirm the issues raised were reported to the CDI Tactical and Crime Governance Groups, in this instance we obtained the Violent Crimes audit report which outlined the issues raised for all five sample cases.</p> <p>We reviewed the Violent Crimes audit report and determined based on the findings the following actions had been raised in this report:</p> <ul style="list-style-type: none"> Officers Investigating Crimes (OICs) should review the original crime aided-dispatch (CAD) notes when recording crimes to ensure every aspect has been recorded or negated and shows full clarifications on the CAD and the occurrence evidence log (OEL), and not using the term 'no offences disclosed'. 	

Area: Data Quality

- Ensure all related crimes are linked correctly on Niche.
- Closure Officers should ensure all crimes are identified before a STORM log is disposed of.
- All staff should check the occurrence type is correct before logging a crime.

Other Crimes Audit (April - May 2023):

For the five sample cases considered, we confirmed for each an issue was recorded within the audit workbook. We confirmed all five sample cases were recorded in the feedback spreadsheet with the issues declared. We noted within the feedback spreadsheet none of the five sample cases were recorded as being unresolved or resolved. However, while undertaking the walkthrough testing, we confirmed all five sample cases had been appropriately actioned within the Niche record. We obtained the Other Crimes audit report which was presented to the CID Tactical and Crime Governance Group and confirmed for all five sample cases the issues were raised.

We reviewed the Other Crimes audit report and determined based on the findings the following actions had been raised in this report:

- Where additional victims are mentioned by call takers, they should evidence that the call taker has informed other victim to report or take names. OIC should evidence reasonable enquiries regarding additional victims and record an additional crime.
- Call takers need to be specific with 'make off without payment' if a crime has occurred. If the call taker states they believe it was a genuine mistake we need to advise this is not a police matter. If the police decide to intervene a crime should be recorded.
- If the Force Crime Management Unit (FCMU) decides not to validate a submitted crime report, there should be enough evidence within the event to negate the offence. If not, this should be queried with the OIC to ensure the correct crime recording decision is made.

Sexual Crimes Audit (June - July 2023):

We selected five sample cases and confirmed for each an issue was raised within the audit workbook. We reviewed the feedback spreadsheet and confirmed for all five sample cases an issue was recorded. However, we recognised within the feedback spreadsheet none of the sample cases had been updated to confirm whether they were resolved. Further testing with the FCIR confirmed that all five crimes had been actioned and correctly updated within the Niche record. Through review of the associated Sexual Crimes audit report, we confirmed all five sample cases were raised as an issue and this information was presented to the CDI Tactical Group and the Crime Governance Group.

We reviewed the Sexual Crimes audit report and determined based on the findings the following actions had been raised in this report:

- Upfront recorders should opt to advise what points to prove need to be met rather than adding crimes on probability for state-based offences.
- OIC should evidence consideration of cause and incite offences when investigating indecent image incidents. If requests were made to an U16, a cause and incite offence is required if it is the principal state-based offence.
- Child Abuse and Vulnerable Adults (CAVA) should record to investigate, not investigate to record, where adults report crime on behalf of a child unless circumstance do not meet points to prove.

Area: Data Quality

- Public Protection Notice (PPNs) need to be reviewed by FCMU to ensure all crimes are identified.
- Police Online Investigation Team (POLIT) may require process and administrative support to ensure multiple offences per incident are recorded faster to comply with NCRS.
- 'Named' or 'suspect' tag may require review to ensure it is being appropriately used, especially offences concerned with the taking, making or distribution of obscene images (referred to as "take make" offences in the report)..

Sexual Crimes Audit (August - September 2023):

In the five sample cases reviewed, we identified each was raised as an issue within the audit workbook. Through review of the feedback spreadsheet, we noted that four of the sample cases were recorded as resolved. In the remaining case there was no confirmation in the feedback spreadsheet of whether this action was unresolved or resolved. However, when undertaking the walkthrough testing with the FCIR, we confirmed that all five sample cases had been resolved in the Niche record. The Sexual Crimes audit report for August - September was presented to the CDI Tactical and Crime Governance Groups and the issues raised for all five sample cases had been outlined.

We reviewed the Sexual Crimes audit report and determined based on the findings the following actions had been raised in this report:

- OIC/FCMU/PCIU should evidence consideration of "take make" / crimes when adding or investigating cause and incite offences.
- All staff need to be aware of the Principal Rule guidance.

Violent Crimes Audit (August - September 2023):

In the five sample cases tested, we noted each was raised as an issue within the audit workbook. While reviewing the feedback spreadsheet we identified that none of the five sample cases reviewed were recorded as whether they had been unresolved or resolved. However, when completing our walkthrough testing with the FCIR, we noted all five sample cases had been appropriately updated on the Niche record. The final test we undertook was to confirm the issues raised were reported through the governance structure, we obtained the Violent Crimes audit report which was presented to the CDI Tactical and Crime Governance Groups which outlined the issues raised for all five sample cases.

We reviewed the Violent Crimes audit report and determined based on the findings the following actions had been raised in this report:

- Ensure all violent crimes are recorded and appropriate enquiries are undertaken to identify the victim. Call takers should ensure all enquiries are followed up on before closing an occurrence.

Where the detailed feedback spreadsheet is not appropriately updated, the Quality and Compliance Team risk being unable to appropriately identify the current status of the actions they have raised. This could result in further monitoring discrepancies if they are not reported into the CDI Tactical or Crime Governance meetings with the correct status.

Management Action 1	The Quality and Compliance Team will ensure they update the detailed feedback sheet within the audit workbook, to ensure there is an effective audit log of actions resolved to allow management to monitor the current rate of resolved actions.	Responsible Owner: Force Crime and Incident Registrar	Date: 29 February 2024	Priority: Medium
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Area: Data Quality

Control	<p>The Force Crime and Incident Team has access to amend a crime within Niche.</p> <p>The Force Crime and Incident Registrar undertakes an annual audit of transfers, cancellations <i>and</i> reclassifications of cases to ensure they are being dealt with in line with the National Crime Recording rules (currently underway for this year at the time of fieldwork).</p> <p>Missing control:</p> <p>The Force undertakes an annual transfer audit to identify possible areas of non-compliance and report any feedback and actions necessary.</p>	<p>Assessment:</p> <p>Design ×</p> <p>Compliance -</p>
Findings / Implications	<p>We were limited with the testing we could complete on the cancellation and reclassification of crimes as this audit only takes place on an annual basis and at the time of the audit, this was part way through completion. We aimed to obtain the results from 2022, but the FCIR confirmed the audits for last year were cancelled as the HMICFRS audit took priority at the time.</p> <p>We understood there are five separate codes for cancelling or transferring a crime:</p> <ul style="list-style-type: none">• C1 is a transfer to another area and refers to crimes that are not covered in Cleveland.• A C2 code is a cancellation due to additional verified information (where the Force can determine that no crime has occurred).• C3 is a cancellation for duplicate crimes.• C4 is for a crime that has been recorded in error and is not a crime (such as a dangerous dog that has not attacked anyone).• C5 is for self-defence and is extremely rare. <p>We obtained the current cancellation and reclassification audit which was ongoing to review the working papers to understand the current process on how this is managed in the team. We confirmed the FCIR is responsible for completing the cancellation and reclassification audit. The purpose of this audit is to identify whether crimes recorded in Niche have since been cancelled incorrectly or there is no supporting information available on the OEL to confirm the reason for such cancellation. The same process is applied for reclassifications; identification of audits which are categorised as an incorrect crime type.</p> <p>Through review of the audit workbook we noted the common failures were as follows:</p> <ul style="list-style-type: none">• Crimes recorded in error.• Incorrect categorisations of crime.• No crime to record.• Duplication of crimes.	

Area: Data Quality

Transfers of crimes between forces can be processed by the Force Crime Management Unit (FCMU). The FCMU can make minor reclassifications to crimes, such as the level of assault or updating the age of the victim or suspect; however, all other reclassifications are required to go through the DDM.

In discussion with the FCIR we understood they currently do not undertake consistent audits on transfers of crimes as these are usually dealt with by FCMU. However, they would consider a review of this area to understand current compliance rates and whether this is a possible risk of which they are currently unaware of.

While undertaking the audit, the FCIR requested a member of their team undertake a review of transfers to identify whether there is a risk that they are not correctly recorded in line with the NCRS and HOCR and whether the Force needs to embed a consistent review process. Through discussion with the FCIR we understood they have reviewed a selection of transfers in the last six months and identified no areas of non-compliance.

They therefore determined a consistent audit review of transfer would not be considered high priority as there is currently no risk associated and the NCRS and HOCR do not consider this as a high-risk area.

However, failure to audit transfers of cases on a consistent basis could give rise to a risk that errors or other issues are not identified.

We were advised that this action has been completed since the completion of our fieldwork.

**Management
Action 2**

The Force will consider the risk of transferred crimes and whether an appropriate review needs to be scheduled to ensure compliance with NCRS and HOCR.

Responsible Owner:

Force Crime and Incident Registrar

Date:

Complete

Priority:

Low

APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Priority	Definition
Low	There is scope for enhancing control or improving efficiency and quality.
Medium	Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.
High	Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*	Non Compliance with controls*	Agreed actions		
			Low	Medium	High
Data Quality	1 (7)	1 (7)	1	1	0
Total			1	1	0

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

Debrief held	15 November 2023	Internal audit contacts	Daniel Harris, Head of Internal Audit
Draft report issued	15 December 2023		Philip Church, Associate Director
Responses received	19 December 2023 and 10 January 2024		Michael Gibson, Manager
			Hollie Adams, Assistant Manager
			Naomi Longstaff, Senior Auditor
Final report issued	19 December 2023	Client sponsor	Director of Finance and Assets
Revised Final report issued	11 January 2024		Head of Corporate Services
		Distribution	Director of Finance and Assets
			Force and Crime Incident Registrar
			Head of Corporate Services

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