



THE CHIEF CONSTABLE OF CLEVELAND

Data Quality Process (Crime Recording) – Force Audit and Monitoring Mechanisms

Internal audit report 3.21/22

FINAL

29 June 2021

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1. EXECUTIVE SUMMARY

With the use of secure portals for the transfer of information, and through electronic communication means, remote working has meant that we have been able to complete our audit / assignment and provide you with the assurances you require. It is these exceptional circumstances which mean that 100 per cent of our audit has been conducted remotely. Based on the information provided by you, we have been able to sample test the control framework.

Why we completed this audit

The Force received an overall judgement of 'inadequate' by HMICFRS (Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services) in the Crime Integrity Inspection from 2018. The results of the inspection have necessitated improvements in the Force's crime recording processes and procedures to ensure compliance with the National Crime Recording Standards (NCRS) and Home Office Counting Rules (HOCR).

In response to the inadequate inspection result, the Force have implemented a Crime Data Integrity (CDI) Gold Group, which is chaired by the Assistant Chief Constable (ACC) with the purpose of ensuring crime recording compliance is given sufficient priority and actions are taken as required across the Force. In June / July 2021, the Force are disbanding the CDI Gold Group, and instead a dedicated CDI Governance Group will be implemented and chaired by the Deputy Chief Constable (DCC). The CDI Governance Group will have a similar remit to the CDI Gold Group.

The Force recruited the Force Crime and Incident Registrar, who joined Cleveland Police in October 2020 and brings a wealth of experience in crime recording and knowledge of the NCRS and HOCR. Responsibilities of the Force Crime and Incident Registrar include 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. Currently, the Force Crime and Incident Registrar and Sergeant (the Force's designated decision maker (DDM)) are delivering a training programme on crime recording across a 10-week period. At the time of the audit, four weeks of the planned 10 weeks' sessions had been completed.

Following the instatement of the Force Crime and Incident Registrar, the Force have implemented a bi-monthly audit process to review the quality of crime recording and the Force's compliance with the NCRS. Bi-monthly audits are categorised into three categories (violence, sexual and other crimes). The Force mirror the audit methodology used in HMICFRS inspections and have adapted the HMICFRS audit workbooks; however, it is important to note that whilst the Force have adopted this audit methodology, the audit process is still relatively new (first audit conducted in February 2021) and therefore the process is still being adapted and developed to ensure it is fit for purpose and meets the needs of Cleveland Police.

It was agreed with management that we would not repeat similar testing to that conducted by HMICFRS as part of this audit, rather our testing of crimes would focus on the samples taken as part of the bi-monthly audits to provide assurance on the quality, effectiveness and consistency of the bi-monthly audit process.

Actions from the bi-monthly audits are presented to the CDI Gold Group (and going forward, will be presented to the CDI Governance Group) to ensure areas of concern are given appropriate attention at a senior officer-level. The Quality and Compliance Team task officers with corrective actions within the Niche system to provide an explanation on where and why the discrepancy has occurred (as per NCRS) and ensure that appropriate corrective action has been taken to rectify the error in question. The Quality and Compliance Team add a diary reminder within the Niche system to verify actions have been taken.

Conclusion

As agreed with management, we have not re-conducted an HMICFRS-style audit of crime recording at Cleveland Police, rather we have focused on providing assurance on the audit process and mechanisms in place to monitor the quality in crime data and compliance with NCRS. We have agreed four management actions, comprising of **one medium** and **three low** priority actions.

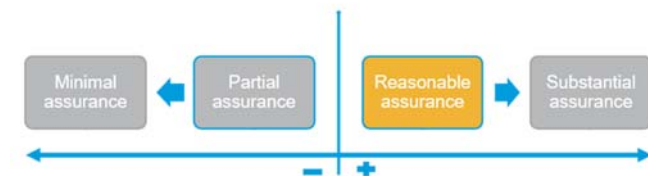
Our review has established that the Force are making good progress in addressing the concerns raised as part of the HMICFRS inspection in 2018 and have implemented appropriate governance arrangements to ensure compliance with NCRS is monitored across the Force. The introduction of the Force Crime and Incident Registrar and the development of bi-monthly audit process has increased the Force's level of assurance on the quality of crime data and compliance with NCRS. We further confirmed that crime recording is given a high priority within the Force with the introduction of the CDI Gold Group and dedication to a pre-meeting between the ACC, Force Crime and Incident Registrar, and the Head of Quality, Performance and Review.

Whilst the Force still have work to do in educating officers on the requirements of NCRS, our review has considered the processes in place to review the Force's compliance with NCRS and HOCR to be effective. The Force have further plans in place to address issues in crime recording, for example, by re-instating a stand-alone Force Crime Management Unit (FCMU), which should assist in ensuring compliance with NCRS.

Internal audit opinion:

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

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified area.



Key findings

Our audit identified the following exceptions with the Force's established control framework resulting in one medium priority action:



We selected 32 crimes from the three February 2021 audit workbooks (violence, sexual and other crimes) conducted by the Quality and Compliance Team. We undertook a walkthrough of the Niche system with the Force Crime and Incident Registrar and the Quality Assurance and Audit Officer to verify the findings of the audits of each crime and ensure that the audit process is operating effectively and efficiently.

There were no discrepancies identified within our testing of 22 crimes from the violence and other crimes audit workbooks. However, for the sexual crimes testing, from the selected 10 crimes, we noted three instances where discrepancies were not picked up by the auditor. Details of these three discrepancies are as follows:

- for one crime, the suspect had been incorrectly recorded on the Niche system and instead, should have been recorded as the witness of the crime;

- in the next case, the primary case was recorded accurately as harassment. However, the secondary cases were recorded as assault and indecent exposures but had been recorded on the Niche system as assault and criminal damage; and
- in the final crime, the Quality and Assurance Audit Officer explained that the occurrence should have three crimes recorded rather than only the one crime recorded.

We identified one further discrepancy in testing where the records on the audit workbook were unclear. The crime was marked in 'red' (indicating a discrepancy); however, this crime had not been recorded on the detailed feedback tab. The Force Crime and Incident Registrar had completed a dip sampling exercise on this workbook given the complexity of the cases and this crime was reviewed twice: once as part of the initial audit and again by the Force Crime and Incident Registrar for quality assurance purposes. Changes were made following testing; however, an audit trail of the review and changes was not clearly documented within the workbook.

These discrepancies had already been identified by the Force Crime and Incident Registrar during the dip sampling exercise undertaken prior to our review and action plans have been put in place to address these findings.

We further identified inconsistencies in the recording methodology within the workbook, for example, the use of the detailed feedback sheet. There is a risk that if audits and detailed feedback sheets are completed inconsistently and discrepancies not appropriately recorded, the effectiveness of bi-monthly audits could be reduced, and incorrect crime recording may be missed. **(Medium)**

For details of the low priority management actions agreed, please see section two of this report.

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



The Force have established a dedicated gold group meeting to monitor the Force's progress in ensuring the consistency of crime recording and manage the risk associated with the crime reporting function. The meeting is chaired by the Assistant Chief Constable (ACC) and attendees include other members of the senior management team from across the Force. We received an action log updated from these meetings and agendas from January 2021 onwards to ensure these meetings are regularly held.

Gold group meetings occur every six-weeks and an action log is maintained to support meeting discussions. A pre-meet is held with the Force Crime and Incident Registrar, the Head of Performance, Quality and Review, and the ACC prior to the meetings. The Force Crime and Incident Registrar can raise any concerns or queries to the ACC prior to the meeting. Through discussions with the Force Crime and Incident Registrar and review of evidence, we determined that the Force Crime and Incident Registrar has appropriate access to the Force's senior management team.

Going forward, the Force are disbanding the current Gold Group arrangements for crime recording and are developing a Chief Officer-led CDI governance meeting, which will be chaired by the Deputy Chief Constable rather than the ACC. The new governance arrangements are expected to go live in June / July 2021 and will service as a long-term replacement for the CDI Gold Group, broadly covering the same topics and issues.



The Force have developed the NCS / NCIR (National Crime Standards / National Standard for Incident Recording) and Quality Assurance Audit Schedule for planned audits in 2021 / 2022. The annual audit plan is a risk-based plan, which covers eight separate risk areas and sets out scheduled testing for each area. The audit schedule considers risks in crime recording across the Force and was developed as a further response to the HMICFRS findings from 2018.

The NCRS / NSIR and Quality Assurance Audit Schedule was presented to the CDI Gold Group in January 2021 (following the instatement of the Force Crime and Incident Registrar in October 2020) and was agreed in advance at the pre-meeting with the ACC. We received the CDI Gold Group highlight report from January 2021 presented by the Force Crime and Incident Registrar to confirm this.



The Force conduct bi-monthly audits to determine whether crimes have been correctly recorded as per the NCRS and HOCR. Crimes are categorised into three audit areas: violence, sexual, and other crimes. Each audit workbook includes a detailed feedback sheet to ensure any discrepancies identified are appropriately recorded and considered.

The audit process is relatively new and fully commenced from February 2021 onwards. We received the three audit workbooks for February 2021 and compared the results of audit tests with reports presented to the CDI Gold Group by the Force Crime and Incident Registrar. In all three cases, audit results and relative issues were accurately reported to the CDI Gold Group and reflected the detailed findings of the audits undertaken.



There is one Designated Decision Maker (DDM) in place at the Force who is responsible for reviewing and approving crime reclassifications and cancellations. 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. This process was reiterated within an internal communication issued by the Force Crime and Incident Registrar in April 2021. The DDM presents training on the NCRS and HOCR to officers throughout the Force.

Previously (approximately 12 – 24 months ago), the Force had a dedicated crime management unit (previously known as CMSB) in place to manage the recording of crimes; however, currently the Force only have one DDM in post. Discussions with the DDM and the Force Crime and Incident Registrar established that a business case has been developed and approved for the creation of a stand-alone FCMU to administratively support crime management with the purpose of improving data quality, crime data integrity, and compliance with NCRS 24-hour recording and correct crime finalisation outcomes. We received the approved business case and understand that plans are underway to implement the unit. We understand the FCMU will provide additional support to the Force's crime recording and reduce the demands on the DDM.



The Force regularly monitor the recommendations and areas for improvement raised during the 2018 HMICFRS crime integrity inspection to ensure they have been appropriately actioned. We have verified that 10 separate progress reports each covering the 10 recommendations and AFIs, were reported to the Inspection and Audit Monitoring Board in May 2021. The reports were presented to ensure adequate monitoring is in place and that progress can be reviewed and discussed to ensure recommendations and AFIs have been addressed.

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 (crime recording)				
Control	The Force use the NCRS as their procedure for reporting crimes. This is a nationally agreed standard and is available for officers either via the internet or via the Force's intranet platform, SharePoint.		Assessment:	
	The Force plan to develop their own internal policies or procedures once the stand-alone FCMU is established.		Design	✓
			Compliance	×
Findings / Implications	<p>The NCRS is a nationally agreed standard and originally created by the Association of Chief Police Officers to ensure the consistency of crime recording across police forces. It contains required standards that all forces must follow in crime recording. The NCRS is available on the internet for anyone to access and officers at Cleveland Police can further access the NCRS through the Force's intranet platform, SharePoint, via an internet link, which ensures that officers are accessing the most up-to-date version of the standard.</p> <p>The Force acknowledge that there are currently no standard operating procedures in place to provide information on local crime recording at Cleveland Police. We understand that once the stand-alone FCMU is established, the Force expect to implement standard operating procedures.</p> <p>Where the Force do not operate a standard operating procedure, there is a risk that officers do not have access to local information on crime recording, including information on specific systems, needs, or internal processes, which could lead to inaccuracies in crime recording.</p>			
Management Action 1	Once the Force Crime Management Unit is developed, the Force will implement standard operating procedures for crime recording to ensure that officers are informed of processes and expectations specific to Cleveland Police.	Responsible Owner:	Date:	Priority:
		FCMU Manager	31 March 2022	Low

Area: Data quality (crime recording)

Control	<p>Crime recording audits are conducted bi-monthly in three crime categories (violence, sexual, and other crimes) with any actions noted and contact made with the relevant officer, where applicable.</p> <p>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 Gold Group meetings.</p>	<p>Assessment:</p> <p>Design ✓</p> <p>Compliance x</p>
Findings / Implications	<p>It was agreed with management that our audit would not mirror the HMIC inspection testing for crime recording, rather our audit would focus on the crimes selected in the crime recording audits for February 2021 to review whether discrepancies have been accurately recorded and reported, and provide assurance on the effectiveness and consistency of the crime recording audit process.</p> <p>The schedule for audits is outlined within the Assurance Matrix spreadsheet. The audit team maintain audit workbooks for each crime area, including detailed feedback sheets on discrepancies noted. This process ensures that all information is recorded and can be verified by a third-party. Any progress undertaken at the time of the audit is immediately recorded.</p> <p>We selected 12 violence crimes chosen as part of the February 2021 audit, which included three crimes with discrepancies identified and nine crimes where no issues were noted. We undertook a walkthrough of each crime of the Niche system with the Force and Incident Registrar and in all 12 cases, we corroborated audit findings against NCRS guidance. For all three crimes with discrepancies, we confirmed that action was taken to rectify the issues identified in the February 2021 audit testing and appropriate audit trail existed on the Niche system.</p> <p>For the 10 other crimes that were selected as part of the sample of the February 2021 audit, we confirmed that all 10 had been correctly audited and the correct codes had been input into the system. In the three instances in which a discrepancy was noted in the February audit, all three had been correctly identified, recorded on the detailed feedback sheet and the system subsequently updated to rectify the discrepancies.</p> <p>We selected 10 sexual crimes reviewed as part of the February 2021 audit, we verified that the audit process was consistent and accurate in six of the 10 cases. In the remaining four instances, we noted that:</p> <ul style="list-style-type: none"> for one crime, the suspect had been incorrectly noted and instead, should have been recorded as the witness of the crime on the Niche system. We queried this with the Force Crime and Incident Registrar, and it was agreed that the discrepancy was missed by the auditor during testing and would form part of the data quality audit testing. We further noted that the call taker in the detailed feedback sheet had been incorrectly stated, which risks accountability for discrepancies being incorrectly recorded. The Force Incident and Crime Registrar has informed us the data quality issues identified have now been corrected; for another selected crime, at the time of testing, it was unclear as to why the crime was recorded as a 'pass' when the crime was marked as red on the testing spreadsheet and appeared to have discrepancies noted. There was no record on the detailed feedback sheet to outline what was discovered at the time of audit testing. The auditor had initially requested a fourth crime to be recorded; however, the Force Crime and Incident Registrar identified in dip sampling that the fourth crime was not actually required and has 	

Area: Data quality (crime recording)

since been cancelled. However, the numbers of crimes on the audit workbook do not reflect the correct situation nor does the audit workbook clearly document the quality assurance review by the Force Crime and Incident Registrar;

- in the third case, the Quality Assurance and Audit Officer outlined that the correct primary crime was recorded as harassment. However, the additional crimes recorded should be assault and criminal damage rather than assault and indecent exposure. Whilst it is not always clear, based on the case details and evidence recorded on Niche, it would appear that the indecent exposure could be included under the harassment crime. The Force Crime and Incident Registrar outlined that the auditor may have felt that the indecent exposure was the principal crime because of the sexual element and outlined that neither auditor's decision could be criticised in this instance due to the complexity of the case. We further noted that the COP collar number on the detailed feedback spreadsheet had been incorrectly recorded; and
- in the final case, the Quality and Assurance Audit Officer explained the occurrence should have had three crimes rather than only one crime; however, this was not picked up at the time of the audit. The Force Crime and Incident Registrar has sent this crime to the DDM and original auditor to rectify.

Discussions with the Force Crime and Incident Registrar established that discrepancies within the sexual crimes audit testing had already been identified prior to our completion of the audit. The Force Crime and Incident Registrar had completed a dip sampling exercise to assess the quality of audit work completed; however, this review was not fully documented within the sexual crimes audit workbook we received, meaning the information documented was not fully clear.

There is a risk that if audits and detailed feedback sheets are completed inconsistently and discrepancies not appropriately recorded, the effectiveness of bi-monthly audits could be reduced, and incorrect crime recording may be missed.

In addition to the above discrepancies, we identified inconsistencies in the recording of information by different auditors in the detailed feedback spreadsheet. For example, one auditor would record all collar numbers included in crime recording and another auditor noted only the collar number who appears responsible for the identified discrepancy. Without clear guidance on the recording requirements for the detailed feedback sheet, there is a risk that discrepancies identified as part of bi-monthly audits may not outline clear lines of accountability.

We further noted that other crimes audit workbook for February 2021 did not include any detail on equality information recorded against each crime. Equality information has been outlined as an area for improvement for all Forces; however, Cleveland Police are in the process of querying this with the Home Office to obtain further clarity on recording requirements as there are inherent limitations in the Niche system which prevent the Force from fully documenting equality information, for example, there is no section for recording disability or LGBTQ+ status. Discussions with the Force Crime and Incident Registrar outlined that the Force do have the capacity to record age, gender and ethnicity, and has advised that the Quality and Compliance Team that any recorded information (age, gender or ethnicity) should be included within the audit workbook testing; however, this information was not recorded in the other crimes workbook. We note that the bi-monthly audits have only started fully from February 2021 and the Force have adopted the HMICFRS inspection framework to

Area: Data quality (crime recording)

carry out these audits. As the audits are still a relatively new process, the Force are constantly reviewing its approach with the aim of improving processes. Where the Force do not fully document the available equality information on the Niche system as part of the bi-monthly audits, the Force may not be fully considering the Home Office national areas for improvements in reviewing this information.

Management Action 2	<p>The Force Crime and Incident Registrar will consider the findings of our testing and revise audit processes to ensure a consistent approach is adopted. This will include but not limited to outlining requirements for equality of information and the detailed feedback sheet.</p> <p>The Force Crime and Incident Registrar will further determine how quality assurance reviews are documented within the crime audit workbooks to ensure there is a sufficient audit trail where changes to findings have been made.</p>	Responsible Owner: Force Crime and Incident Registrar	Date: 30 September 2021	Priority: Medium
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Area: Data quality (crime recording)

Control	<p>The DDM is responsible for all transfers, cancellations, and reclassifications.</p> <p>Minor reclassifications can be completed by qualified and experienced officers that were part of the former CMSB before it was disbanded.</p>	Assessment:	
		Design	✓
		Compliance	x
Findings / Implications	<p>We have selected 15 cancellations or transfer of crimes to ensure they have been correctly managed and have all been completed by the DDM (or in extreme cases, the Crime and Incident Registrar).</p> <p>There are five separate codes for cancelling or transferring a crime. 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 (the DDM explained that he has not seen an example of this whilst working as the DDM).</p> <p>For the purpose of our testing, we have selected five C2, five C3 and five C4 codes to ensure a range has been considered. Of the 15 samples, 14 had been closed correctly and no issues identified. For the remaining cancellation, we noted that this had not been sent to the DDM for review. There had already been a crime of harassment transferred from South Yorkshire Police and the OiC (officer in charge) had already identified this, and as per NCRS, as only one crime should be recorded in a series of events, the operator has cancelled the crime as it was recorded in error. The correct cancellation code had been applied; however, this was a responsibility of the DDM rather than the crime operator.</p>		

Area: Data quality (crime recording)

Although the crime operator in this discrepancy had correctly applied the correct cancellation for this crime, this may not always be the case, and where cancellations are not sent to the DDM for approval, there is a risk that crimes may be incorrectly cancelled by officers who lack the appropriate authority or knowledge to do so.

Management Action 3	The Force Crime and Incident Registrar will issue a reminder to all officers on the instances in which crimes should be referred to the DDM.	Responsible Owner: Head of Force Control Room	Date: 31 August 2021	Priority: Low
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Area: Data quality (crime recording)

Control	<p>The Force Crime and Incident Registrar and the DDM are in the process of conducting training sessions on crime recording throughout the Force. The training programme is running for a total of 10 weeks and is expected to reach the majority of officers.</p> <p>The Force Crime and Incident Registrar is working with the Learning and Development Department to further develop the Force's crime recording training package, potentially using the online NCALT training platform to enable remote and continuous access to the Force's training material.</p>	Assessment: Design ✓ Compliance ×
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Findings / Implications	<p>Discussions with the Force Crime and Incident Registrar established that the Force have identified that crime recording training across the Force is an area for improvement, particularly given the results of the HMICFRS inspection conducted in 2018. Training on crime recording sits as a standing agenda item on the CDI Gold Group meetings.</p> <p>The Force Crime and Incident Registrar and the DDM are currently delivering a training programme over 10 weeks to all initial response officers that are available. This ensures that each officer has at least one days' worth of training on crime recording and is aware of their responsibilities and correct procedures for recording crimes. The Force were part-way through the training programme at the time of our audit and therefore we have not conducted testing to assess training completion rates. However, we did receive the training programme PowerPoint presentations, which included information of crime types, involvements, and current concerns in the Force, for example, the recording of malicious communication crimes.</p> <p>The Force Crime and Incident Registrar aims to further expand the training programme to include a lot more formalised training moving forward, for example, the Force Crime and Incident Registrar has met with the Learning and Development Department to discuss the development of an NCALT (National Centre for Applied Learning Technologies) training package for crime recording. The NCALT package would allow all officers to access training material at their convenience and facilitate continuous completion, where required. However, given the demands on the Learning and Development Department, the NCALT package may take some time to develop and implement.</p> <p>The Quality and Compliance Team bi-monthly audits ensure that discrepancies identified in sampled crimes are raised with the relevant officers and their superiors, where identified. However, implementing regular training facilities, such as an NCALT package, would ensure</p>
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Area: Data quality (crime recording)

that officers are provided with up-to-date information and guidance on crime recording and can re-visit any areas of concern, where applicable. Without an accessible training package, there is a risk that officers do not have appropriate resources to increase their understanding of NCRS and reduce the level of crime recording-related errors.

Management Action 4	<p>The Force Crime and Incident Registrar is liaising with the Learning and Development Department on the development of an NCALT package for crime recording, which would enable online and continuous access to training materials.</p> <p>Given the demands on the Learning and Development Department, the Force Crime and Incident Registrar will continue to review the bi-monthly audits to identify any areas of concerns and raise any future training needs, as appropriate.</p>	Responsible Owner: Force Crime and Incident Registrar	Date: 31 December 2021	Priority: Low
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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 management actions		
					Low	Medium	High
Crime recording (data quality)	0	(9)	4	(9)	3	1	0
Total					3	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.

APPENDIX B: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The internal audit assignment has been scoped to provide assurance on how the Chief Constable of Cleveland manages the following area.

Objective of the area under review

To ensure crimes have been recorded consistently and in accordance with the National Crime Recording Standards (NCRS) and Home Office Counting Rules (HOCR).

Scope of the review

The Force's Crime Integrity Inspection (2018) resulted in an overall judgement of 'inadequate'. We will consider the internal arrangements of the Force for checking crime records by the Crime Registrar; including the checks performed and training provided to ensure consistency in crime recording. We will assess if the most suitable checks are being performed or if validation is focussed on meeting HMICFRS requirements. Our review will consider the following areas:

- Policies and supporting procedures are in place and provide direction and clarity on how the Force manage the recording of crimes. Policies are reviewed on a periodic basis and are available to staff.
- The Force Crime Registrar has appropriate access to the Force's senior management team and there is auditable evidence of communication with the Force's senior management team.
- A risk-based annual audit plan has been developed including the engagement with stakeholders and key themes / historical performance have been reviewed to ensure resource is used effectively.
- Review of the audits undertaken and how actions identified are implemented and followed up.
- Designated Decision Makers (DDMs) have been appointed and decisions made are reviewed to ensure standards are maintained.
- Review of how transfer, cancellation and reclassification of crimes are managed.
- We will select a sample of crimes from a sample of outcomes to confirm the crime has been recorded in accordance with the Force's own detailed findings and national guidance.

- Review of how the actions raised as part of the crime integrity inspection have been monitored, tracked and embedded.

The following limitations apply to the scope of our work:

- We will not confirm all crimes have been recorded in accordance with the Home Office Counting Rules or other national guidelines.
- We will not undertake a complete review of the quality of data recorded in Niche as testing will be undertaken on a sample basis only.
- We will not duplicate or replicate the HMICFRS's approach or testing.
- Testing will be completed on a sample basis.
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

Debrief held	8 June 2021
Draft report issued	10 June 2021
Revised draft report issued	15 June 2021
Responses received	29 June 2021

Final report issued	29 June 2021
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