



House of Commons

Public Administration Select  
Committee (PASC)

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# **Caught red-handed: Why we can't count on Police Recorded Crime statistics**

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**Thirteenth Report of Session 2013–14**





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to the report*

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## The Public Administration Select Committee (PASC)

The Public Administration Select Committee is appointed by the House of Commons to examine the reports of the Parliamentary Commissioner for Administration and the Health Service Commissioner for England, which are laid before this House, and matters in connection therewith, and to consider matters relating to the quality and standards of administration provided by civil service departments, and other matters relating to the civil service.

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### Committee staff

The current staff of the Committee are Catherine Tyack and Sian Woodward (Joint Clerks), Rebecca Short (Second Clerk), Alexandra Meakin (Committee Specialist), Jim Lawford (Committee Assistant) and Jonathan Olivier Wright (Web and Publications Assistant). Rod McInnes was seconded to the Committee from the House of Commons Library during this inquiry.

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# Contents

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<b>Report</b>	<i>Page</i>
<b>Summary</b>	<b>3</b>
<b>1 Introduction</b>	<b>5</b>
<b>2 Police Recorded Crime (PRC)</b>	<b>6</b>
Background	6
Previous reports since 2000 documenting concerns about crime statistics	8
Concerns about data quality	9
Misrecording of sexual offences	14
The role of the Crime Survey for England and Wales (CSEW)	17
<b>3 Removal of National Statistics status</b>	<b>19</b>
The Crime Statistics Advisory Committee (CSAC)	21
Implications for other public sector administrative statistics	23
<b>4 Police leadership, values and culture</b>	<b>24</b>
The College of Policing Code of Ethics	24
Target-chasing versus data integrity	25
The move away from national targets	26
Broader concerns about police values	30
Whistleblowing	30
<b>5 Monitoring and audit</b>	<b>34</b>
Monitoring of crime recording since 2002	34
HMIC's 2014 Crime Data integrity inspection	36
<b>6 Police and Crime Commissioners</b>	<b>39</b>
<b>Conclusions and recommendations</b>	<b>41</b>
<b>Formal Minutes</b>	<b>48</b>
<b>Witnesses</b>	<b>49</b>
<b>Published written evidence</b>	<b>50</b>
<b>List of Reports from the Committee during the current Parliament</b>	<b>52</b>





## Summary

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Crime statistics published by the Office for National Statistics (ONS) are central to our understanding of the nature and prevalence of crime in England and Wales. They provide crucial information for the police which helps them to decide how to deploy their manpower resources. Lax supervision of recorded crime data risks reducing the police's effectiveness in their core role of protecting the public and preventing crime.

Measurement of crime is based on two main statistical sources: (i) the Crime Survey for England and Wales (CSEW, formerly the British Crime Survey) and (ii) Police Recorded Crime (PRC). The CSEW and PRC provide strong evidence that the overall volume of crime has been falling. However, there is an accumulation of substantial and credible evidence indicating that the PRC data do not represent a full and accurate account of crime in England and Wales. Of most importance, we have strong evidence that PRC under-records crime, and therefore the rate of decrease in crime may be exaggerated, and this is due to lax police compliance with the agreed national standard of victim-focused crime recording.

As a result of PASC's inquiry and the evidence we have exposed, the UK Statistics Authority (UKSA) decided in January 2014 to strip PRC data of its designation as National Statistics. We conclude that the Home Office, ONS and UKSA have been far too passive in the face of concerns raised about PRC; they have repeatedly missed opportunities to ensure the integrity and quality of PRC data.

The cessation of regular external audit of police force crime recording in 2007 was a mistake. We recommend the re-instatement of annual audits of crime recording practices.

HM Inspectorate of Constabulary's inspection in 2013 into the Kent Police found clear evidence that targets are detrimental to the integrity of crime data. Numerical targets for individual police officers and police forces as a whole, based on PRC data, and set by senior police officers or Police and Crime Commissioners (PCCs), drive perverse incentives to misrecord crime, tend to affect attitudes and erode data quality. Some PCCs consider the perverse incentives created by targets to be so serious that they have dropped all targets. We applaud them. The attitudes and behaviour which lead to the misrecording of crime have become ingrained, including within senior leadership. This leads to the subordination of data integrity to target-chasing. This can present officers with a conflict between achievement of targets and core policing values.

We deprecate the use of targets in the strongest possible terms. The Home Office, which claims credit for abolishing national numerical targets, should also be discouraging the use of such targets. The Home Office must also take responsibility and accept accountability for the quality of PRC statistics. Senior police leaders must ensure that emphasis is placed on data integrity and accuracy, not on the achievement of targets. We regard such practice as a flawed leadership model, contrary to the policing Code of Ethics. The quality of leadership within the police, and its compliance with the core values of policing, including

accountability, honesty and integrity, will determine whether the proper quality of PRC data can be restored. We are convinced that this requires leadership in many police forces to place new emphasis on values and ethics, especially in the Metropolitan Police Service. We recommend that the Committee on Standards in Public Life conducts a wide-ranging inquiry into the police's compliance with the new Code of Ethics; in particular the role of leadership in promoting and sustaining these values in the face of all the other pressures on the force.

# 1 Introduction

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1. Crime statistics published by the Office for National Statistics (ONS) are central to our understanding of the nature and prevalence of crime in England and Wales. The statistics are based on two main sources: (i) the Crime Survey for England and Wales (CSEW, formerly the British Crime Survey) and (ii) Police Recorded Crime (PRC). The CSEW provides strong evidence that the overall volume of crime has been falling for up to two decades. PRC since the current series began in 2002/03 also shows that crime overall has been falling. There is no evidence to contradict this trend, though some types of crime have fallen much faster than others. However, there is an accumulation of substantial and credible evidence indicating that crime as recorded by the PRC data does not represent a full and accurate account of crime in England and Wales. There is strong evidence that PRC is under-recording, and therefore exaggerating the rate of decrease in crime, primarily due to lax police compliance with the agreed national standard of victim-focussed crime recording. As a result of this inquiry and the evidence we have exposed, the UK Statistics Authority (UKSA) decided in January 2014 to strip PRC data of its designation as National Statistics.

2. The Chair of PASC was contacted by a serving police officer, PC James Patrick, acting as a whistleblower, who had serious concerns about the validity of crime statistics. We are indebted to PC Patrick for his courage in speaking out, in fulfilment of his duty to the highest standards of public service, despite intense pressures to the contrary. The purpose of our inquiry was to examine whether crimes were being recorded by the police appropriately, to look at the factors which can influence police misrecording of crime, and to assess whether enough has been done to ensure the integrity of crime data. Ultimately, we wanted to know whether policy makers and the public can have confidence in the statistics which result from the recording of crime by police forces. We called for written evidence, and held four oral evidence sessions, hearing from current and former police officers, academics, senior police officers, Police and Crime Commissioners, HM Inspectorate of Constabulary, UKSA, the ONS and the Home Office minister, Norman Baker MP. Prompted by PASC's inquiry, the Home Affairs Committee also took evidence on this issue, during their current inquiry into Police and Crime Commissioners.<sup>1</sup>

3. This study on crime statistics is part of a wider programme of work we are carrying out on statistics and their use in Government. A full description of the studies is set out on our website at [www.parliament.uk/pasc](http://www.parliament.uk/pasc). We are grateful to our Specialist Adviser on statistics, Simon Briscoe, for his help with this inquiry.

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1 Home Affairs Select Committee, inquiry into [Police and Crime Commissioners](#).

## 2 Police Recorded Crime (PRC)

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### Background

4. Crime statistics published by the Office for National Statistics (ONS) are central to the understanding of the nature and prevalence of crime in England and Wales. The statistics are based on two main sources:

- The PRC series: the number of 'notifiable offences' recorded by the police (notifiable offences comprise all offences that could be tried by jury, plus a few additional closely-related offences);
- The Crime Survey for England and Wales (CSEW; known until April 2012 as the British Crime Survey)—a large scale population survey conducted since 1982, which captures crimes experienced by adults, whether or not these crimes were reported to the police, as well as gauging public perceptions of the police.

Each of these sources has its own inherent strengths and limitations but together they should provide a more comprehensive picture of crime than could be obtained from either series alone.

5. Our inquiry examined crime recording practices in England and Wales. Police crime recording arrangements in Scotland and Northern Ireland are the responsibility of the devolved administrations; although the UKSA's jurisdiction is UK-wide. The Police Service of Northern Ireland records crime using the same National Crime Recording Standard as in England and Wales, while Scottish PRC is compiled in accordance with the Scottish Crime Recording Standard, introduced in April 2004. Both jurisdictions also conduct what are known as household victimisation surveys; the equivalent of the CSEW.

6. HM Inspectorate of Constabulary for Scotland published their "review of incident and crime recording" in December 2013.<sup>2</sup> This looked at compliance with crime recording standards since 1 April 2013. It found that 93% of the records examined complied with the standards, stating "Compliance rates varied according to crime type, ranging from 99% for domestic abuse to 89% for sexual offences. We were disappointed that the total proportion of compliant incidents fell below the accepted standard of 95%."<sup>3</sup> The review notes that "the very high compliance rates for domestic abuse illustrates what can be achieved when a focussed and robust approach is taken to attending, investigating and recording a particular crime type".<sup>4</sup>

**7. Our inquiry covered crime statistics in England and Wales. However, it would be surprising if similar issues to do with the quality of the statistics did not exist in Northern Ireland and Scotland. HM Inspectorate of Constabulary for Scotland's recent**

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2 HM Inspectorate of Constabulary for Scotland, [Review of incident and crime recording](#), December 2013

3 HM Inspectorate of Constabulary for Scotland, [Review of incident and crime recording](#), December 2013, p1

4 As above, p1

**review into compliance of police recording with the expected standards gives cause for concern—the recording of some crime types falls well below the expected standard.**

***8. We recommend that UKSA urgently investigate the quality of crime statistics in Scotland and Northern Ireland and their compliance with the Code of Practice, in the light of the findings of this inquiry, and UKSA's decision to remove the 'National Statistics' kitemark from crime statistics in England and Wales.***

9. The collection and publication of data on crimes recorded by police forces in England and Wales began in 1857, making it one of the longest-running administrative datasets in the country. The main technical guidance document which informs police recording decisions, the Home Office Counting Rules (HOCR), has existed in one form or another since the 1920s.

10. The recorded crime figures are a by-product of a live administrative system which is continually updated as incidents are logged as crimes by police forces, and then investigated. As a result, some offences may change category, for example from theft to robbery. Other incidents initially recorded as crime may on further investigation be found not to be a crime—this is referred to as 'no-criming' (as distinct from 'not-criming', whereby an incident is not recorded as a crime in the first place). The rules stipulate that a recorded crime can be retrospectively 'no-crime'd' if 'additional verifiable information' emerges which demonstrates that no crime was committed. Another relevant non-crime incident type is 'crime-related incident' (CRI), used when the balance of probabilities suggest that a crime was committed, but no victim (or representative) can be found to confirm this.

11. Currently, the Home Office is responsible for collating raw data from police forces each month, performing some validation checks and querying outliers with forces, who may then re-submit data. The Home Office statisticians then supply a snapshot of the data each quarter to the ONS for further analysis and then publication.

12. The PRC dataset serves several vital purposes within the landscape of criminal justice statistics. It:

- indicates trends in overall crime levels (in conjunction with the CSEW);
- includes offences (and victims) falling outside the scope of the CSEW, for example, offences such as possession of weapons and drugs, and potential victims such as those living in communal establishments;
- enables detailed analysis of crime incidence at a local level (the CSEW cannot do this, due to sample-size constraints);
- provides detail on the incidence of individual offences and offence types;
- underpins the data on crime detection rates and criminal justice outcomes; and

- gives forces an account of what crimes are happening and where, and provides an important indicator of the size and distribution of police workloads, and so is a crucial factor which determines how police forces identify priorities and deploy resources.

**13. Accurate Police Recorded Crime data is essential if Police and Crime Commissioners and Chief Constables are to know what crimes are being committed in their area and therefore how to respond.**

14. There have long been concerns about the reliability and consistency of police recording practices. Debates about whether changes in PRC reflected actual changes in crime rather than changes in reporting and recording practices were part of the reason for the introduction of the British Crime Survey in 1982. The last fifteen years have seen a succession of reports examining PRC as part of broader reviews of crime statistics, detailed in the table below.

### **Previous reports since 2000 documenting concerns about crime statistics**

- HMIC, Povey, K, [On the record: Thematic Inspection Report on Police Crime Recording, the Police National Computer and Phoenix Intelligence](#), 2000
- Home Office, [Review of Crime Statistics](#), 2000
- Lynn P and Elliot D, [The British Crime Survey: a review of methodology](#) (2000)  
Simmons J, Legg C and Hosking R, [National Crime Recording Standard: an Analysis of the Impact on Recorded Crime](#) (2003)
- Statistics Commission, Crime Statistics: User Perspectives—[interim report](#) and [final report](#), 2006
- Smith, A, [Crime Statistics: An independent review](#), carried out for the Home Secretary, 2006
- Audit Commission, [Police Data Quality 2006–07](#), 2007
- Casey L, [Engaging Communities in Fighting Crime](#), Cabinet Office, 2008
- Sir Ronnie Flanagan, [Independent Review of Policing](#), 2008
- UKSA, [Overcoming Barriers to Trust in Crime Statistics England and Wales](#) Monitoring report 5, 2010
- ONS, [National Statistician's Review of Crime Statistics for England and Wales](#), 2011

15. In the wake of a critical inspection of police recording practices published by HM Inspectorate of Constabulary in 2000, the National Crime Recording Standard (NCRS) was

developed and introduced in 2002/03, with the aim of standardising crime recording practices across forces and establishing a more victim-oriented *prima facie* model of crime recording whereby the police are required to record a victim's report if it amounts to a crime in law and there is no credible evidence to the contrary.

16. The introduction of the NCRS led to an immediate structural increase in the number of crimes recorded in the first two years of its implementation (2002–03 and 2003–04). Since this initial bedding-in phase, overall recorded crime levels have fallen in every subsequent year, at a faster rate that the CSEW suggests is credible.

17. In January 2011 the Home Secretary announced an independent review into the collection and publication of crime statistics, to be led by the National Statistician.<sup>5</sup> In order to address concerns that the Home Office's involvement in publishing crime statistics was undermining public confidence in the political independence of the figures, the review was tasked with identifying an independent body which would take over responsibility for publication. The review, published in June 2011, recommended that responsibility for publishing the main crime statistics (PRC and the British Crime Survey, now the CSEW) be transferred from the Home Office to the ONS; this took effect from April 2012.<sup>6</sup> The review also led to the creation of a Crime Statistics Advisory Committee (CSAC) to provide expert advice on methodological issues.

### Concerns about data quality

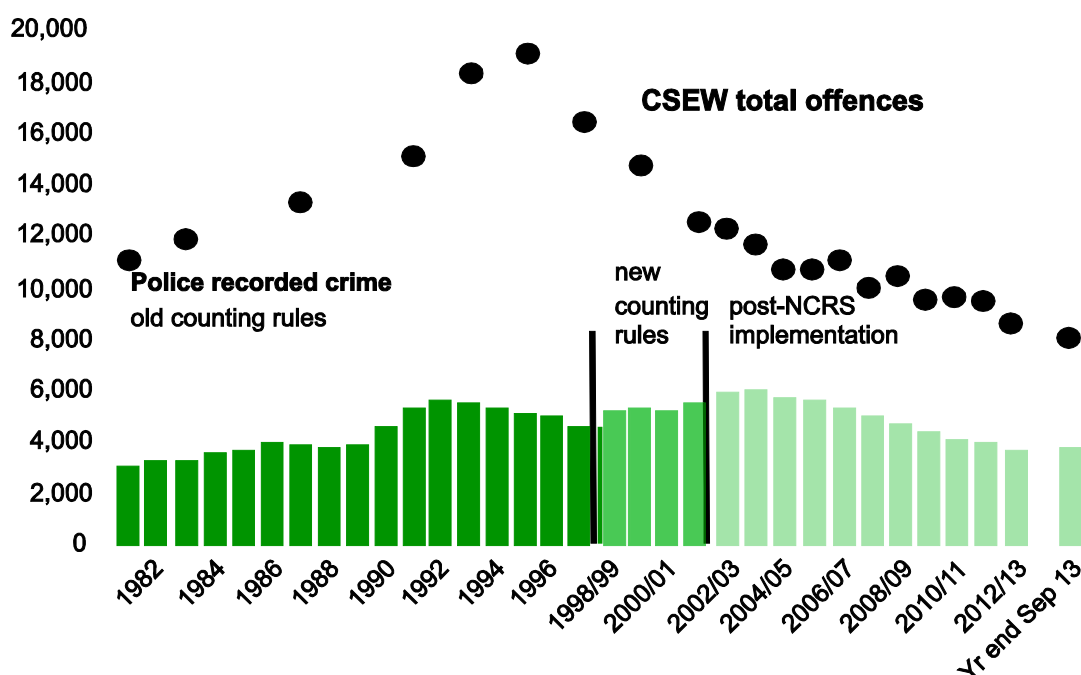
18. The CSEW provides strong evidence that the overall volume of crime has been falling over the past twenty years. The findings of the CSEW broadly parallel the overall trend indicated by the PRC data since 2002–03 (the first year of NCRS implementation)—the overall volume of crime recorded by both measures has fallen by 38% (from 2002/03 to year end September 2013), as illustrated by the chart below.

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5 HC Deb, 20 Jan 2011, [col 49WS](#)

6 Office for National Statistics, [National Statistician's Review of Crime Statistics: England and Wales](#), June 2011

**Chart 1: Trends in police recorded crime (vertical bars) and Crime Survey for England and Wales (CSEW - dots), 1981 to year ending September 2013**



Source: ONS Crime Statistics, year ending Sept 2013

19. There will be inevitable changes over time in how people report crime—what an independent review of crime statistics, written for the Home Secretary in 2006, called “unknown and uncontrollable variability in the public’s reporting of crime to the police”.<sup>7</sup> However, we have seen an accumulation of substantial and credible evidence—based on statistical analysis and on authoritative testimony from current and former police officers—indicating that:

- the PRC data does not correctly represent the rate of decrease in crime or the composition of crime;
- that the erosion of police compliance with the agreed national standards of victim-focused crime recording has contributed to this; and
- that monitoring and audit arrangements have been insufficient to ensure acceptable standards of data quality and integrity.

As a result of this evidence, UKSA decided in January 2014 to strip the PRC data of their designation as National Statistics, discussed later in this report.

20. In January 2013 the ONS published an analysis of crime trends which identified a divergence between the PRC data and the CSEW.<sup>8</sup> While both datasets show a clear downward trend over the last decade, the PRC dataset has in recent years shown a faster

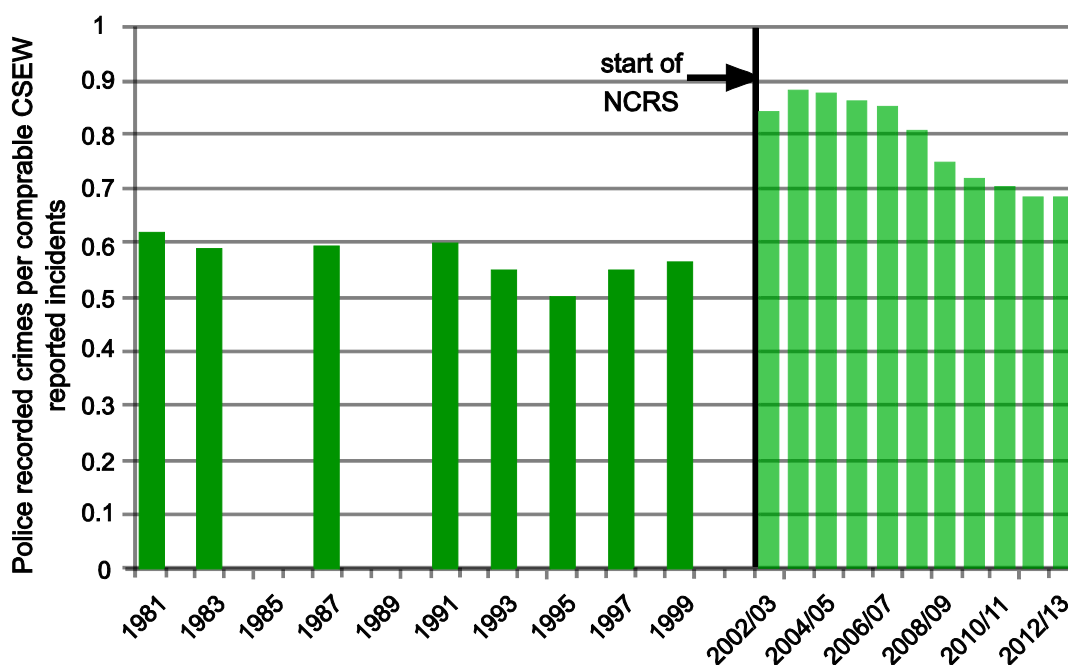
7 Professor Adrian Smith, [Crime statistics: an independent review](#), carried out for the Home Secretary, 2006

8 ONS, [Methodological note: analysis of variation in crime trends](#), 24 January 2013



decline than the CSEW for comparable offences, resulting in a smaller ratio of recorded crimes to CSEW crimes within the comparable subset, shown in the chart below.

**Chart 2: Ratio of police recorded crimes to CSEW reported incidents**



21. While the ONS analysis has said that “the data can’t tell us why the police appear to be recording a lower proportion of crime reported to them than in previous years”, it did suggest that declining standards of compliance with the established recording rules may have contributed to this divergence:

Given the consistent pattern, one possible hypothesis is that there has been a gradual erosion of compliance with the NCRS such that a growing number of crimes reported to the police are not being captured in crime recording systems.<sup>9</sup>

Among the possible drivers for this divergence, the ONS suggested the following:

- lack of awareness or adequate understanding of the NCRS as time passes from its launch leading to some officers recording ‘as charged’ or ‘if detected’ which might result from staff turnover and lack of sufficient on-going training;
- performance pressures associated with targets (for example, to reduce crime or increase detection rates) acting as perverse incentives for some crimes to be downgraded from notifiable into non-notifiable categories or as anti-social behaviour or as crime-related incidents (which are not captured in data returned to the Home Office);

- though forces have continued with their own internal audits, the cessation of independent audits from 2006-07 onwards may have reduced the focus on addressing non-compliance;
- the move to Neighbourhood Policing in recent years may also have led to more low-level crimes being dealt with informally and outside the formal crime recording system; and
- in the context of pressure on police budgets and a general policy shift to promote greater officer discretion, a return to a more evidential recording model.<sup>10</sup>

22. The ONS's analysis was one of the most recent to signal a problem with the PRC data. However, as the ONS report concedes, such high-level analysis:

cannot provide a definitive answer to these points or confirm or disprove these hypotheses. Nor, in the absence of regular independent audits since 2006–07 is it possible to draw on evidence to assess whether or not compliance with the NCRS has indeed changed over time.<sup>11</sup>

23. To gain a deeper insight into the reality of police forces' recording practices, we are heavily reliant on the testimony of concerned officers and staff working on the 'frontline' of the crime recording system. This inquiry was prompted by the concerns expressed by PC James Patrick, a serving officer in the Metropolitan Police with involvement in data analysis. PC Patrick is also a constituent of the Chair of PASC, Bernard Jenkin MP.

24. In his written and oral evidence to this inquiry, PC Patrick raised a number of specific and serious concerns relating to crime recording practices in the Metropolitan Police—such as the downgrading of offences to a less serious offence category (for example, from robbery to theft from the person) and also particularly troubling evidence in relation to the potential misrecording of sexual offences, which we consider later in this Report.<sup>12</sup>

25. Such concerns have been reinforced by an array of evidence and comments from serving and former officers, including those who have served at the most senior levels. For instance, Lord Stevens, former Metropolitan Police Commissioner, told the Home Affairs Committee in January 2014 that “ever since I have been in the police service, there has been a fiddling of figures” and that it was still going on.<sup>13</sup> Evidence from Dr Rodger Patrick (no relation of PC James Patrick), former Chief Inspector at West Midlands Police, sets out his research showing how the perverse incentives embedded in quantitative performance management regimes encourage a range of 'gaming' behaviours that result in under-recording of crime.<sup>14</sup> We discuss the issue of performance culture and gaming later in this Report.

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10 As above, p10

11 As above, p11

12 CST02, CST34, CST73, Q6-64

13 Oral evidence taken before the Home Affairs Committee on [7 January 2014](#), HC (2013-14) 757-ii, Q343-350

14 CST05, Q2-61

26. It is suggested that deliberate misrecording of crime is one source of under-recording. However, under-recording of crime can of course come about as a result of police officers' misunderstanding or ignorance of the established rules and principles of crime recording, which would be a particular problem in forces where crime recording training is inadequate or where there is insufficient communication of the core principles of crime recording to officers. For example, officers may erroneously set the evidential bar too high when making a recording decision, based on their perception of the likelihood of a Crown Prosecution Service charge, rather than using the victim-focussed standard prescribed by the NCRS.<sup>15</sup> Witnesses have also pointed out that lack of understanding of the counting rules can in some instances lead to over-counting of crime.<sup>16</sup>

27. Gwent Chief Constable Jeff Farrar, in his capacity as National Policing Lead for Crime Statistics, also raised the possibility of tension between compliance with official rules and the common-sense exercise of professional discretion in the public interest:

The majority of audits and inspections over the past ten years have been based on the hypothesis that administrative accuracy supports the highest quality of service for victims. However, it is not necessarily the case that such accuracy equates to the most victim-focussed response. This often brings Crime Registrars and their staff into direct confrontation with police officers who perceive them to be prioritising compliance with the rules over the needs of victims and the wider public. [...] This professional judgement arguably cannot currently be applied to crime recording and this repeatedly causes tension across the Service.<sup>17</sup>

To illustrate this point, Chief Constable Farrar used the example of a parent contacting the police for help in disciplining an 11-year-old son who had stolen money from her purse:

That is a crime and in the Home Office counting rules should be recorded as a crime, and there should be a crime outcome. That crime outcome could be a caution; it could be prosecution; it could be community resolution, but there should be a crime outcome. That then goes into the system. The reality is: would that member of the public have phoned us if they thought that was the approach we were going to take?<sup>18</sup>

28. Olivia Pinkney, then Assistant Inspector of Constabulary at HMIC (now Deputy Chief Constable at Sussex Police), explained to us that the new revised framework for recorded crime outcomes gives officers scope to apply a non-punitive outcome to a recorded crime where a prosecution or other criminalising sanction-detection outcome may not be in the victim's or the public's interest. She added that there will be "a much greater breadth of explanation for the public" about this.<sup>19</sup> The revised framework aims to ensure that police

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15 Q433 [Tom Winsor]

16 Q425 [Olivia Pinkney] and CST10 [Insp. Michael White]

17 CST24

18 Q211

19 Q432

officers know, and the public understand, that the police have the discretion to take a victim-focussed, common-sense approach, within the standards for recording crime.<sup>20</sup>

**29. It is not credible to suggest that sensible resolution of the tensions between a rigid compliance with the recording rules and a common-sense approach can explain the exaggerated decline of Police Recorded Crime. Our witnesses provided a wealth of insight into the various ways in which crime data accuracy and integrity can be and have been compromised. However, the lack of regular and rigorous audit of crime recording practices in recent years makes it impossible to assess the extent of any compromise and the relative importance of these factors. The re-establishment of regular annual external audit of forces from this year onwards, which we discuss later in this Report, provides a vital opportunity to fill this gap in the understanding of the problem and to contribute towards a durable solution.**

**30. It is vital that the Government ensures the accuracy and reliability of Police Recorded Crime. Police Recorded Crime provides a crucial intelligence resource for the police and informs the operational deployment of police resources. Lax supervision of recorded crime data risks reducing the police's effectiveness in their core role of protecting the public and preventing crime because they cannot deploy resource effectively if they are not aware of the true level and nature of crime.**

**31. Under-recording or miscategorising crime erodes public trust in the police and undermines the trust and confidence of frontline police officers in police leadership: it creates doubt that the public will be taken seriously when they report a crime.**

### Misrecording of sexual offences

32. A particular troubling aspect of the evidence heard by the Committee related to the misrecording of sexual offences by means of excessive recourse to 'no-criming' decisions and classifying cases as 'crime-related incidents' (CRI), rather than recorded crimes. The IPCC's critical report on the Southwark police's Sapphire Unit's recording of sexual offences in 2008-09, found "officers of all ranks [...] felt under pressure to improve performance and meet targets".<sup>21</sup> It stated that no-criming "benefited the unit's performance statistics" and "the number of serious sexual offences classified as a 'no crime' or as a 'crime related incident' was consistently higher than the MPS [Metropolitan Police Service] average".<sup>22</sup> PC Patrick described to us a more recent analysis of sexual offence recording decisions he conducted in 2013. He suggested that his findings indicated continuing excessive 'no-criming' and CRI-ing of sexual offences.<sup>23</sup>

33. Sir Bernard Hogan-Howe, the Metropolitan Police Service Commissioner, gave oral evidence to the Home Affairs Committee two weeks after our session with PC Patrick

20 Q432

21 Independent Police Complaints Commission, [Southwark Sapphire Unit's local practice for the reporting and investigation of sexual offences, July 2008 - September 2009](#)

22 As above

23 Q7-11, CST02

(largely in connection with their inquiry into counter-terrorism). He said then that “[HMIC] inspected our systems in 2012 and found them to be competent and reliable” and “we think that some of the comments that this officer made to the Public Affairs Committee relate to a period of over two years ago when the no crime issue was around 25%”.<sup>24</sup> However, when he gave oral evidence to us in January 2014, he added that “some of the concerns that were expressed—for example about the no-criming of rape—are things that for police, and for others, have been a real issue over many years”.<sup>25</sup> PC Patrick submitted further evidence, which argued that the concerns were recent, not historic, giving data up to 2012-13.<sup>26</sup>

34. Data subsequently obtained from the Metropolitan Police under Freedom of Information by the Bureau of Investigative Journalism, and included in PC Patrick’s evidence, show the ‘no-crime’ and CRI rates in relation to alleged rapes reported to the Metropolitan Police in 2008–09 to 2012–13. The figures show that a decline in the ‘no-crime’ rate after 2008-09 was accompanied by an offsetting increase in the CRI rate in the same period, leaving the overall no-crime-and-CRI rate within the range of 25%-30% over the five years in question. This gives rise to the suspicion that even though police forces may have succeeded in reducing instances of unjustified ‘no criming’, any gain in overall accuracy of the recording was offset by an increase in those reported crimes which were categorised as CRIs. PC Patrick pointed out in his written evidence that during the period in question “significant efforts were made to specifically reduce ‘no-criming’—the central issue raised by the IPCC in the Southwark report”.<sup>27</sup>

35. We heard evidence that the desire to avoid unsolved reported sexual offences remaining on the system can go as far as trying to justify ‘no-crime’ on the basis of “mental health or similar issues of vulnerability” and that “what happened in Southwark is still happening.”<sup>28</sup> In the wake of these allegations, the Metropolitan Police Service Commissioner Sir Bernard Hogan-Howe announced before the Home Affairs Committee on 3 December that the Metropolitan Police had commissioned a piece of academic research examining the force’s no-criming decisions in respect of sexual offences, in order to investigate whether police officers put pressure on women to withdraw their allegations.<sup>29</sup>

36. There remain wide disparities in the no-crime rates for reports of rape crime. In January 2014, HMIC, on behalf of the Rape Monitoring Group, released a compendium of statistics on recorded rapes in each force over the previous five years. This revealed wide disparities between forces in the no-crime rate for reported rapes and in the rates of recorded rapes per 100,000 adults. According to these figures, in Lincolnshire, for example,

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24 Oral evidence taken before the Home Affairs Committee on [3 December 2013](#), HC (2013-14) 231-iv, Q336 [Sir Bernard Hogan-Howe]

25 Q300

26 CST34, CST73

27 CST34

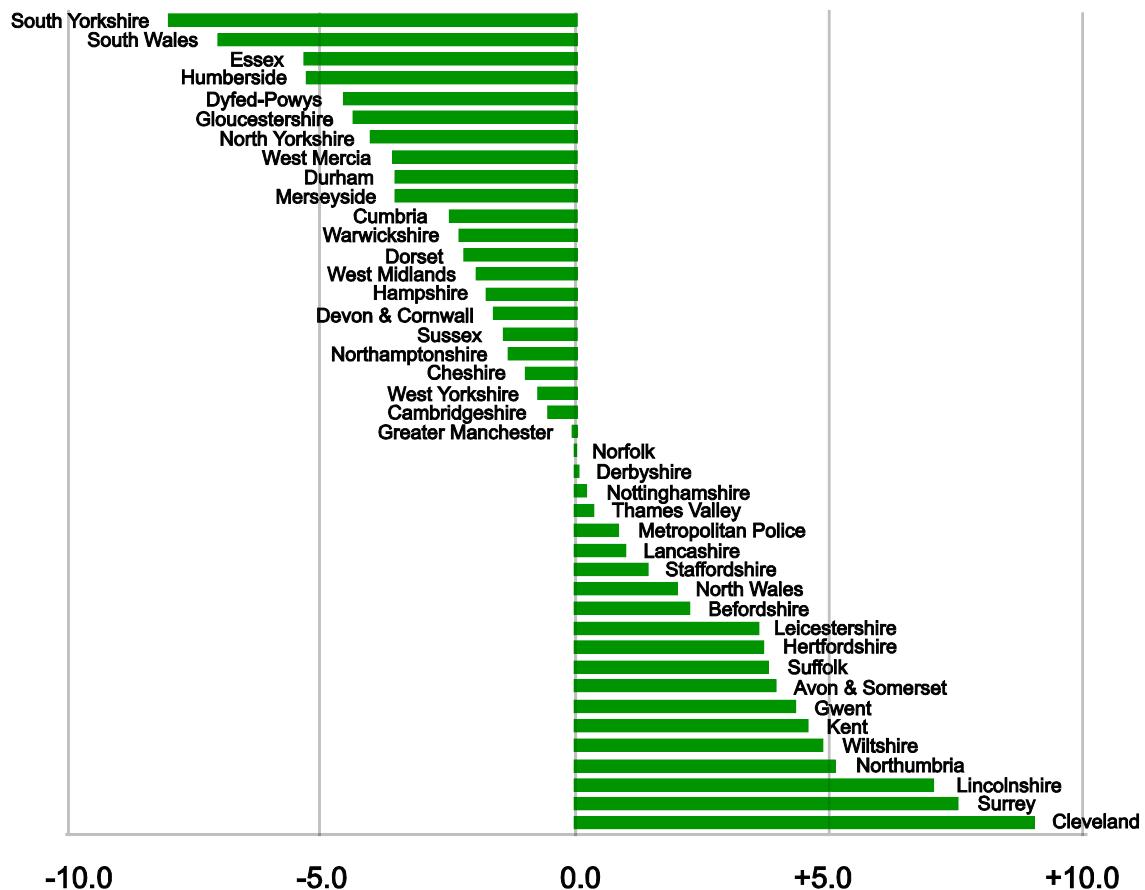
28 Q8-12 and CST02

29 Oral evidence taken before the Home Affairs Committee on [3 December 2013](#), HC (2013-14) 231-iv, Q336-7

26% of all reported rapes were no-crimed in 2012–13 and 20% were no-crimed in 2011–12. This contrasts with Merseyside, where 4% reported rape crimes were no-crimed in 2012–13 and 9% were no-crimed in 2011–12.<sup>30</sup>

37. In the chart below shows how far the no-crime rate for reported rape incidents differs from the average no-crime rate for England and Wales, aggregating the data from April 2008 to March 2013.<sup>31</sup> The national average no-crime rate for that period was 11.9% - that is, an average of 11.9% of reported rape incidents were no-crimed over that five year period. The chart shows that some forces, such as Cleveland, Surrey and Lincolnshire, had a far higher no-crime rate than the national average, while others, such as South Yorkshire, South Wales and Essex, had far lower no-crime rates than the national average.

**Chart 3: Divergence from the average no-crime rate for reported rape incidents, five year total**



38. When we asked him about these issues, Sir Bernard told us that the data accuracy for rape and sexual offences was “a lot better than it was, if we took it back five to 10 years” but did not think that it was entirely reliable.<sup>32</sup> He agreed that there was a “cause for concern”

30 HM Inspectorate of Constabulary, [Rape Monitoring Group - adult and child rape data 2012-13](#)

31 As above. House of Commons Library analysis of data. City of London omitted due to small number of recorded rapes.

32 Q329

and told us that “there is clearly something that PC Patrick raises that we need to get to the bottom of.”<sup>33</sup> He said he was taking three actions to address these issues: (1) invite academics to review quarterly the Metropolitan Police’s no-crime reports (2), invite a public figure to look at how the Metropolitan Police looks at sexual offences generally; and (3) change the standard for no-criming sexual offences to “beyond reasonable doubt”.<sup>34</sup>

**39. Any instance of deliberate misrecording of sexual offences is deplorable, but especially so if this has been brought about by means of improperly persuading or pressurising victims into withdrawing or downgrading their report.**

**40. The disparities between different police forces in the ‘no-crime rates’ for rapes and sexual offences are sufficient in our view to raise serious concerns about the varying approaches taken by police forces to recording and investigating these horrendous crimes. We look forward to the outcome of the research commissioned by the Metropolitan Police examining the force’s ‘no crime’ decisions in respect of sexual offences.**

**41. The fact that this research is necessary, following the 2008 Independent Police Complaints Commission report into the Sapphire Unit is a damning indictment of police complacency, inertia and lack of leadership. However, the data indicates that the Metropolitan Police Service is unlikely to be the only force of concern.**

*42. The Home Office must undertake a comprehensive analysis in order to explain the extraordinary disparities in no-crime rates for sexual offences across all police forces. We expect this to be completed within two months and included with the response to this Report. We also recommend that the devolved administrations undertake analogous work. This should lead to work to improve the accuracy transparency and reliability of police recorded sexual offences so that a table of no crime rates does not suggest systemic inconsistency in recording practices.*

## **The role of the Crime Survey for England and Wales (CSEW)**

43. The CSEW is a crucially important counterpart to PRC—not least as a benchmark against which the PRC trends can be compared. It is vital therefore that UKSA and the ONS ensure that the CSEW continues to meet the National Statistics standard. However, as it stands, the CSEW cannot give a detailed indication of crime trends at a local level. Although it is a substantial survey, we understand that the sample size is still too small in each force area for the local area survey statistics to give meaningful results for most crimes.

44. We heard that the CSEW could only replace PRC at police force, let alone local or neighbourhood, level at significant cost: an additional £13.7 million would be required in

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33 Q333

34 Q329

order to increase the sample, on top of the existing annual cost of CSEW of £3.8million.<sup>35</sup> From 2004-05 to 2011-12 the CSEW's core sample size was 46,000 adults; as of 2012-13 this has been reduced to 35,000.<sup>36</sup> In respect of interviews with children, the sample has been reduced from 4,000 to 3,000. According to the Home Office, the reduction in the core adult sample resulted from the scrapping of a target in the old Police Performance and Assessment framework, which had required a boosted sample size to achieve 1,000 interviews in each police force area.<sup>37</sup> The Technical Report to the CSEW does no more than state that there has now been a reduction in sample size; it does not give contextual information as to the impact of the sample size on the reliability of the statistics relating from the survey.<sup>38</sup>

**45. We note the reduction in the sample size of the Crime Survey for England and Wales. Police Recorded Crime is the only detailed indicator of crime trends at local level, enabling police forces, Police and Crime Commissioners, local authorities, the public and the Home Office to keep track of crime in different force area. The Crime Survey for England and Wales is no substitute for Police Recorded Crime in respect of monitoring crime trends in local areas.**

*46. We recommend that the ONS review and then publish, alongside the Crime Survey for England and Wales, information about the nature of the sample, including the impact of the reduction in sample size on the reliability of the statistics, its cost over time, and an explanation of what statistics might be published at a sub-national level, for example for the larger police forces.*

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35 UK Statistics Authority, [Assessment of compliance with the Code of Practice for Official Statistics: Statistics on crime in England and Wales](#), January 2013

36 ONS/TNS BMRB, [The 2012/13 Crime Survey for England and Wales Technical report Volume One](#), 2012, pp3, 6-7

37 Home Office, [Changes to British Crime Survey \(BCS\) sample design from April 2012](#) and TNS BMRB / Office for National Statistics, [The 2012/13 Crime Survey for England and Wales Technical report Volume One](#)

38 TNS BMRB / Office for National Statistics, [The 2012/13 Crime Survey for England and Wales Technical report Volume One](#)



### 3 Removal of National Statistics status

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47. 'National Statistics' is the quality mark for official statistics and, in the words of UKSA, it "requires the statistics to be produced, managed and disseminated to high professional standards. The statistics must be well-explained and meet users needs."<sup>39</sup> The Statistics and Registration Services Act 2007 stipulates that an official statistical series must adhere to the statutory Code of Practice for Official Statistics (the Code) in order for it to be designated as a National Statistic. The Code enshrines the principle of "sound methods and assured quality" and requires producers of official statistics to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".<sup>40</sup> The Code also requires that official statistics be well-explained and accessible, and managed impartially in the public interest, "to serve the public good".<sup>41</sup> Since it was established in April 2008, UKSA has performed the role of conducting assessment reviews of each set of official statistics to determine the extent of their compliance with the Code of Practice.

48. The initial UKSA assessment of PRC, published in April 2011, confirmed the National Statistics designation, judging that it complied with the statutory Code of Practice. The 2011 UKSA assessment, like the National Statistician's review of crime statistics published later that year, focussed on presentational aspects of the statistics and the provision by the Home Office of explanatory and methodological material to users. It paid less attention to the quality of the statistics and issues surrounding the creation and handling of the raw data at force level, although it did observe that "there is scope for more discussion about quality, including the accuracy and extent of crime recording by different police forces."<sup>42</sup>

49. The Home Office asked the National Statistician to carry out a review into crime statistics, which reported in 2011. The terms of reference for the review, set by the Home Office, asked ONS to "consider which body outside the Home Office is best placed to have future formal responsibility for the publication of crime statistics" due to concerns about the trustworthiness of crime statistics published by the Home Office.<sup>43</sup> After the initial UKSA assessment report, and in accordance with a recommendation in the National Statistician's 2011 review, the ONS took over the role of producer of the quarterly crime statistics outputs. This included taking over, from the Home Office, the responsibility to provide reassurance to the UKSA assessment team as to the quality of the data collection processes and methodology. However, it was also decided that the Home Office should retain its role in the initial collection and validation of forces' monthly data returns, on the basis of "existing relationships between the Home Office and the police service" and in

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39 [UK Statistics Authority website](#)

40 UK Statistics Authority, [Code of Practice for Official Statistics](#), January 2009

41 As above

42 UK Statistics Authority, Assessment Report 102, [Crime Statistics in England and Wales](#), April 2011, para 3.16

43 [National Statistician's Review of Crime Statistics: England and Wales](#), June 2011, Annex A: Terms of reference

order to “avoid an increase in bureaucracy in the police supply of data to both ONS (for crime statistics purposes) and to the Home Office (for other purposes).”<sup>44</sup>

50. ONS’s statisticians do not, in any case, have direct access to the locations at which these data are generated: inside police forces. To a large extent they have been and remain external observers, reliant on the data submissions and reassurances from the Home Office. They do not have an audit function and are reliant on any audits performed internally within forces or externally by other organisations.

51. Professor Stephen Shute, the Chair of the Crime Statistics Advisory Committee, told us that it would be “a very sad state of affairs” were such a de-designation to occur, while his colleague on CSAC Professor Mike Hough expressed the concern that “if they were downgraded, the system would collapse.”<sup>45</sup> Nevertheless, following evidence exposed by this PASC inquiry, UKSA made a second assessment of crime statistics, published in January 2014. They removed the designation ‘National Statistics’ from PRC data. The separate CSEW retained its National Statistics status.<sup>46</sup> In its assessment report, UKSA noted:

- accumulating evidence that suggests the underlying data on crimes recorded by the police may not be reliable. This evidence includes HMIC assessments of data recording practices;
- ONS's own report, in January 2013, which raised concerns that the degree of compliance with the standards for police crime recording may be falling; and
- high profile concerns raised at the Public Administration Select Committee and the Home Affairs Select Committee.<sup>47</sup>

52. This assessment, unlike the one in 2011, also concluded that ONS did not have sufficient knowledge of (and therefore did not publish enough information about) the processes involved in the recording of crime by police forces and the checks carried out on the data received from police forces, to be assured that they are accurately recorded. It did not provide enough information to users about the quality of the statistics—most importantly the accuracy and reliability of the statistics. The assessment report also referred to an unpublished memorandum of understanding between the ONS and the Home Office which outlines the roles and responsibilities of each department in the production of crime statistics, and recommended that the ONS should publish this information.

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44 CST17

45 Q205 and Q206

46 Police Recorded Crime data continues to be published as usual in the ONS’s quarterly Crime Statistics bulletin, but with the loss of National Statistics status signposted where these data appear.

47 UK Statistics Authority, Assessment Report 268, [Statistics on Crime in England and Wales](#), 15 January 2014

## The Crime Statistics Advisory Committee (CSAC)

53. The Crime Statistics Advisory Committee (CSAC) is a non-statutory body established in 2011 by the National Statistician. It has seven permanent members, from the Home Office, ONS and other government bodies working on crime statistics, and eight non-executive members who are mostly academics. The National Statistician is an ex-officio member. Its terms of reference state that it:

advises the Home Secretary, the Office for National Statistics and Her Majesty's Inspectorate of Constabulary on how best to ensure that official statistics on crime for England and Wales are accurate, clearly presented, comprehensive, transparent and trustworthy taking account of the needs of users and providers.<sup>48</sup>

It is clear from the CSAC's correspondence and its latest Annual Report (for 2012-13) that it has done little on the issue of the divergence in trends between CSEW and PRC. This is despite the National Statistician saying in her report that established CSAC that it should advise "on any changes to the data requirements from the police needed for crime statistics and any changes to Home Office Counting Rules".<sup>49</sup> The Annual Report states only that it "has been considering issues arising from the divergence of data between the Crime Survey for England and Wales (CSEW) and Police Recorded Crime (PRC)", with a view to having a meeting at the end of 2011.<sup>50</sup> It is clear that the Committee's power is limited. Professor Hough, member of CSAC, told us "We can only really operate at arm's length and look at the governance structures that affect local crime recording. [...] We do not have larger, more direct levers."<sup>51</sup> Professor Shute, the Chair of CSAC, added:

[...] we do not have an executive function. We have done a number of things to try to bolster confidence in crime data. We can analyse trends and we can look to see if those disclose worrying aspects of the current system. [...] We can and have offered advice on how the data ought to be presented in a way that is comprehensible to users and to the public more generally, and we have done. There are a number of things we can do, but there are obviously limitations on what we can do. We are an advice body [...]

**54. We commend UKSA for acting in response to the evidence exposed by PASC's inquiry, to strip Police Recorded Crime statistics of the quality designation 'National Statistics'. However, the fact that it took our inquiry, and a whistleblower from the Metropolitan Police Service, to expose sufficient evidence suggests serious shortcomings in UKSA's ability and capacity in their assessment function. We acknowledge their recent decision to remove the designation 'National Statistics', but this cannot mitigate what amounts to a long-standing failure of a number of bodies to address the thoroughness of the assessment of Police Recorded Crime, despite a series of previous reviews which identified shortcomings.**

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48 UK Statistics Authority, [Crime Statistics Advisory Committee terms of reference](#), August 2013

49 [National Statistician's Review of Crime Statistics: England and Wales](#), 2011

50 Crime Statistics Advisory Committee, [Annual Report 2012-13](#)

51 Q146

55. This raises serious concerns around the decision to designate Police Recorded Crime as National Statistics in 2011. It has been quoted by ministers that the ONS described the system for recording crime in England and Wales as “one of the best in the world” in 2012.<sup>52</sup> This was after the cessation of regular external audit of force crime recording in 2007. All can see now that this reflected a lamentable complacency. The then National Statistician took no action at that time. This was wrong—the then National Statistician, or UKSA, once established, should have pressed for other process to be put in place to ensure the integrity of crime data.

56. The reviews of crime statistics by UKSA and the ONS in 2011 failed to expose the unreliability of recording practices within police forces themselves. An opportunity was therefore missed to gather evidence and identify issues which could have called into question the designation of Police Recorded Crime as ‘National Statistics’ at a much earlier stage.

57. It is deplorable that ONS can have overseen the production of crime statistics, which were a set of National Statistics, with what appears to have been very limited knowledge of the ‘quality assurance’ steps that the data went through before being sent to the ONS. The ONS has been too reliant on too little information about the audits performed within police forces or by HM Inspectorate of Constabulary. Overall, the ONS has been too passive in carrying out their duties in relation to crime statistics. This cannot continue.

58. The fragmentation of responsibility between individual forces, Home Office and the ONS was not satisfactory and contributed to the failure of the Police Recorded Crime series to meet the standards of the Code of Practice with which official statistics must comply. No single organisation has taken overall responsibility or accountability for ensuring an acceptable quality of crime statistics, which has led to their inadequate quality.

59. *We endorse UKSA’s recommendation that the ONS should publish a clear statement of the respective roles and responsibilities of the Home Office and the ONS in the production of Police Recorded Crime statistics.*

60. *We recommend UKSA works closely with the Home Office in its role as the first recipient of raw data from forces, and ensures the Home Office takes active primary operational responsibility and accepts accountability for ensuring the integrity of the data which it collates, validates and submits to the ONS for publication. UKSA should hold the Home Office directly accountable for its role in the recorded crime statistics process, including its validation and quality assurance processes as well as its policy guidance to forces and Police and Crime Commissioners, and should in future examine the Home Office’s processes and procedures directly rather than at one remove.*

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52 Decision to designate as National Statistics: see UK Statistics Authority, [Crime Statistics in England and Wales: Assessment with the Code of Practice for Official Statistics](#), April 2011 and [Letter of confirmation as National Statistics](#), January 2012. Quotation from ONS: [Methodological note: Analysis of variation in crime trends](#), January 2013. Quoted by Norman Baker MP, Q531

61. The Crime Statistics Advisory Committee (CSAC), which contains representation of all of the main stakeholders in the crime statistics production process as well as the Chief Inspector of Constabulary, has failed. It has not demonstrated sufficient independence and objectivity in carrying out its role to ensure recorded crime statistics are “accurate, clearly presented, comprehensive, transparent and trustworthy” as set out in its terms of reference. CSAC has a vital role in leading the efforts to provide that the system guarantees the reliability and integrity of all crime statistics emerge strengthened from this episode.

62. *We recommend that UKSA should review the role and composition of CSAC and the structures supporting the production of crime statistics, just as it has recently with a similar committee advising on inflation figures, to ensure that CSAC is independent and rigorous and that these statistics best meet user needs in future.*

### Implications for other public sector administrative statistics

63. The de-designation of PRC potentially raises concerns about data quality and integrity elsewhere in the public sector, where personal and organisational performance is measured against data which those same organisations are responsible for generating, as acknowledged by UKSA. As Ed Humpherson, Head of Assessment at UKSA, told us: “We need to be clear in the way we prioritise the reassessments of official statistics that we place those statistics that are drawn from administrative data high up our list so we get to them first.”<sup>53</sup> UKSA have subsequently published more information on the work which they will be doing to look at statistics produced in areas where targets exist.<sup>54</sup>

64. **We welcome UKSA’s comments that it intends to prioritise in its workplan the reassessment of National Statistics based on administrative datasets, taking on board the lessons learned from the declassification of Police Recorded Crime.**

65. *UKSA must not in future grant to, or maintain, the kitemark of ‘National Statistics’ on any set of statistics where it has failed to verify whether the underlying data meets the standard required. They should, as a matter of urgency, review all other similar statistics where collection processes are beyond the control of the ONS. UKSA should review the Code of Practice for Official Statistics to determine whether it needs to be revised to allow for the new emphasis on administrative data.*

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53 Q475

54 UK Statistics Authority, [Administrative data and Official Statistics](#) press statement, 7 February 2014 and UK Statistics Authority website, [Administrative data and Official Statistics](#) webpage giving more detail on the programme of work.

## 4 Police leadership, values and culture

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### The College of Policing Code of Ethics

66. The College of Policing was recently established as the professional body for the police in England and Wales. It has assumed strategic responsibility for development of policy and practice, including PRC statistics. It has developed a new Code of Ethics for the police in England and Wales, based on the seven core principles developed by the Committee on Standards in Public Life (CSPL) (accountability; honesty; integrity; leadership; objectivity; openness; selflessness), with the additional principles of fairness and respect. It articulates the standards of professional behaviour expected of police officers, including a requirement to ensure accurate and honest record-keeping:

- Under the heading 'Honesty and Integrity': "do not knowingly make false, misleading or inaccurate entries in any record or document kept or made in connection with any police activity"
- Under the heading 'Work and responsibilities': "ensure that accurate records are kept as required by relevant legislation and force policies and procedures."

It also establishes "challenging and reporting improper conduct" as a core principle, placing on police officers "a positive obligation to report, challenge or take action against the conduct of colleagues which I believe has fallen below the Standard of Professional Behaviour set out in this Code."<sup>55</sup>

67. The College of Policing's Chief Executive, Chief Constable Alex Marshall, reacted to the testimony heard at PASC's first evidence session by pointing to the draft code of ethics as part of the solution:

The College of Policing's draft code of ethics, which reflects established standards in the service, is very clear that to knowingly make false, misleading or inaccurate entries in records damages our integrity. Where it has been shown that figures have been deliberately misreported, this should be looked into.

The service has come through a period where targets were more important than outcomes and the College is working to ensure greater accuracy and consistency in recorded crime. Modern policing relies on the integrity and robustness of our data, which has huge potential to help us to cut crime further, and I am confident that better recording will benefit police officers, staff and ultimately the public.<sup>56</sup>

68. In its written evidence to this Committee, CSPL welcomed the publication of the draft Code of Ethics and its adoption of the CSPL's Seven Principles of Public Life, and observed

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<sup>55</sup> College of Policing, [Draft Code of Ethics: public consultation](#), October 2013

<sup>56</sup> College of Policing press release, [College of Police comments on recording of crime figures](#), 20 Nov 2013

that the “Seven Principles, especially those of leadership, accountability and integrity apply to the production of crime statistics as well as to other areas of policing.”<sup>57</sup> In a House of Lords debate in November 2013 on public trust in the police, the CSPL’s chairman Lord Bew reiterated his warm welcome for the draft Code, but called for a clearer articulation of the “relationship between not living up to the code of conduct and possible issues of misconduct.” He added that “the great danger is that the College of Policing statement of principles just becomes abstract and out there and is not fully operationalised in the conduct of police officers.”<sup>58</sup>

69. The Chief Inspector of Constabulary in his first Annual Assessment of policing, published in March 2014 while we were completing this Report, emphasised the importance of “the requirement of scrupulous honesty and integrity required of all police officers” as restated in the College of Policing’s Code of Ethics.<sup>59</sup> He added that “in every organisation, the conduct as well as the quality of leadership is a material determining factor in relation to its culture, principles and performance”.<sup>60</sup>

**70. We welcome the adoption of the new statutory Code of Ethics setting out the principles and standards of professional behaviour expected of the police in England and Wales. This is most important in respect of the training of police leadership.**

*71. We recommend that the Home Office and College of Policing make a more explicit statement of how the Code of Ethics’ enforcement framework will impose a duty of data integrity on police officers in respect of crime recording practices, and that penalties will apply in the event of deliberate non-compliance. They must also ensure that officers are familiar with the victim-focussed principles of the National Crime Recording Standard and the distinction between recording standards and charging standards.*

## Target-chasing versus data integrity

72. Accurate crime recording is not merely a technical matter. Effective police recording processes require a professional ethos of data integrity, reinforced by the right set of incentives and messages from senior leadership. This in turn reflects the importance leadership attaches to the values of policing, such as openness, transparency, integrity, which are values at the core of standards in public life.

73. Data integrity in any organisation is at risk of being compromised if the people responsible for generating data are subject to performance appraisal and political pressure based on the trends shown by that data. The natural tendency is for the organisation to prioritise cosmetic improvements in the statistical indicator over the accurate measurement of the real underlying trends. This tendency can only be exacerbated if the

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57 CST06

58 HL Deb, 28 November 2013, [col 1593](#)

59 Her Majesty’s Inspectorate of Constabulary, [State of policing: the annual assessment of policing in England and Wales 2012/13](#), March 2014, para 83

60 HM Inspectorate of Constabulary, [State of policing: the annual assessment of policing in England and Wales 2012/13](#), March 2014, para 89

organisation in question is required to achieve specific quantitative targets based on its own data. Even without any targets, there is a general expectation that the police should aim to cut crime. The Committee has also heard evidence that the legacy of centrally-imposed performance targets has played an unhelpful role in helping to entrench a 'target culture' within forces—and that the problem of target culture persists to this day.

74. Senior leadership is influential in shaping the institutional attitudes and behaviour of the people they lead. In the opinion of Tom Winsor, Chief Inspector of Constabulary:

The quality of leadership in policing, as in so many other organisations, is absolutely critical. The behaviour of the man and woman, and men and women, at the very top of a police force affects the whole culture, the whole approach, and the integrity and the honesty of their operations. If they believe their leaders are misbehaving in some way, that will affect the whole performance and culture of the organisation.<sup>61</sup>

75. Remarks to the Association of Chief Police Officers conference by Derbyshire's Chief Constable Mick Creedon in November 2013, made immediately following this inquiry's first oral evidence session, acknowledged the responsibility of senior police leadership for reinforcing the culture of performance, with the emphasis on targets more than principles:

My fear is that inadvertently we are all still putting pressure on officers to do all they can to manipulate and create crime reductions. [...] It is whether we have the nerve to step away from crime reductions and the obsession with crime figures and move to a real environment where we do properly record. [...] It is sadly what is told to me by many forces still is that everything people do everything they can to make sure crime is not going up. [...] The consequence is another threat to integrity. This is inadvertently caused by what we have done over the past decade. I don't think they do it because they are inherently corrupt, they are doing it because the pressure is on to reduce crime.<sup>62</sup>

## The move away from national targets

76. In 1999, HMIC reported into Police Integrity. They identified crime recording as "perhaps the major area of malpractice connected with the performance culture".<sup>63</sup> Nevertheless, in the mid-2000s, police forces became subject to a centralised assessment regime based on a range of statutory numerical performance targets, of which the PRC data formed a key part. In recent years, central Government has sought to shift the emphasis away from the use of centrally-imposed targets as a means of assessing police performance, but this is not reflected in the attitudes, systems and processes of individual police forces and their governing authorities, Police and Crime Commissioners.

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61 Q420

62 As reported by [BBC](#), [Telegraph](#), [Daily Mail](#), 20 November 2013

63 HM Inspectorate of Constabulary, Police Integrity England, Wales and Northern Ireland: securing and maintaining public confidence, June 1999



77. The Police Act 1996 gave the Home Secretary the power to direct police authorities to establish performance targets.<sup>64</sup> The Policing Act 2002 inserted a requirement for the Home Secretary to publish an annual National Policing Plan setting out strategic policing priorities and specifying the performance indicators (that is, targets) to be used for assessing each force's performance.

78. Between 2004–05 and 2007–08, police performance was assessed using the Policing Performance Assessment Framework (PPAF). Under PPAF, the Home Office graded each force's performance against a range of Statutory Performance Indicators, including crime incidence rates, detection rates and public satisfaction. PRC statistics were central to the calculation of a number of these statutory targets. At the time, concerns were expressed that the importance attached to crude detection rates were leading officers to concentrate on 'low-hanging fruit', focusing unduly on offences that were easier to clear up.<sup>65</sup>

79. Following the Flanagan review of policing, in July 2008 the Home Office's Policing Green Paper "From the neighbourhood to the national: policing our communities together" announced that the Home Office would no longer set or maintain any statutory top-down numerical targets for individual police forces, apart from a target to increase the level of public confidence in the police. The current Government announced in July 2010 that it was scrapping the remaining Government-set target on police forces to improve public confidence, stating that "from now on it will be for communities to decide how well their force is doing".<sup>66</sup> As the Home Secretary remarked in March 2011: "I've scrapped the last remaining national police targets, and replaced them with a single objective: to cut crime."<sup>67</sup>

80. Despite this declared intention to relieve police forces of target-related burdens, the 'target culture' has remained a concern among producers and users of crime statistics. The UKSA's 2010 monitoring report "Overcoming Barriers to Trust in Crime Statistics" noted:

In setting performance targets, much harm can be done if statistics are chosen or used inappropriately. The aspects of a service that matter most to people may not lend themselves to numerical measurement and what can be measured may be a poor substitute. The existence of a target may change the behaviour of service providers in ways that have unexpected and unwanted side effects. There may be scope for manipulation or gaming.<sup>68</sup>

The pernicious effects of target cultures were a recurrent theme in the evidence received by this inquiry. Notwithstanding the widespread awareness of the issue within the policing world, Paul Ford, the Secretary of the National Detectives' Forum at the Police Federation, told us that the target culture is alive and well:

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64 Police Act 1996, sections 36A -38

65 See, for example, [Police 'target culture' hurting crime victims](#), Daily Mail, 19 September 2006 and [Police criminalising young to hit targets, says charity](#), Guardian, 3 April 2008, and [Police condemn 'target culture'](#) BBC, 15 May 2007

66 Home Office, Cm 7925, [Policing in the 21st Century: Reconnecting police and the people](#), July 2010, para 3.5

67 Home Secretary, [Speech on police reform](#), 2 March 2011

68 UK Statistics Authority, [Overcoming Barriers to Trust in Crime Statistics: England and Wales](#), May 2010

We have Police and Crime Commissioners demanding reductions in crime, and again that explanation is placing pressure on people. I think it is really important to understand. I do not think [...] that there are memos and diktats from on high, in my experience, in the organisation I represent. But there is a culture within policing of success and 'We have to do this to be successful'. It pervades every level, unfortunately.<sup>69</sup>

81. The second report of the Winsor Review of Policing in 2012 took on board the problem of perverse incentives and gaming in making its recommendations for police officer pay and progression. The review recommended a qualitative assessment of officers based on values and competencies rather than a quantitative performance measure, noting that:

There is widespread concern that crude performance measures will be inappropriate, creating perverse incentives and promoting the pursuit of short-term, simple, quantitative targets. There is a lack of trust in the ability of the police service to operate a robust performance appraisal system on which to base decisions about individual officers' performance.

82. A particularly disturbing example of how target-chasing can distort the policing of serious crime and harm victims was revealed by the Independent Police Complaints Commission's February 2013 report into Southwark Sapphire Unit's handling of sexual offence investigations in 2008 and 2009, referred to earlier in this Report. The report found that the Sapphire Unit had been "under pressure to improve performance and meet targets" rather than focus on the outcome for the victim and resorted to gaming the figures by inappropriately encouraging victims to retract allegations (so that a 'no-crime', rather than an unsolved crime, was recorded), in clear defiance of the NCRS principles.<sup>70</sup>

83. HMIC's June 2013 inspection report on crime recording in Kent, commissioned at the initiative of Kent's Police and Crime Commissioner Ann Barnes, provided a further illuminating case study into how ingrained target cultures have continued to influence recording practices. Although HMIC found "no evidence of corrupt activity in the way in which the crimes that we looked at had been recorded or resolved", it nevertheless concluded that:

a target-driven culture had, until recently, led to some officers in Kent pursuing crimes on the basis of how easy they were to solve, rather than on their seriousness, or their impact on victims or communities. [...] While such an approach is not unlawful, and does not contravene the letter of the HOCR, it is against the spirit of the rules, which place the needs of victims—not of meeting particular performance targets—at the centre of the crime-recording process. HMIC therefore concludes that there has, in the past, been an institutional bias in Kent towards chasing numerical targets for solving

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69 Q24

70 Independent Police Complaints Commission, [Southwark Sapphire Unit's local practices for the reporting and investigation of sexual offences July 2008-September 2009, Independent Investigation Learning Report](#), February 2013

crime. This has led to some officers focusing on those categories of crime which have the best chance of a quick and easy resolution.<sup>71</sup>

HMIC published an interim progress report on Kent Police in January 2014 which found that the force had “responded positively” to the 2013 inspection and that there had been “considerable improvements to crime recording processes made by the force, and inspectors found substantially greater accuracy in crime recording—although HMIC found that more needs to be done on training and raising awareness of the force’s new approach to managing performance.”<sup>72</sup>

84. In his first Annual Assessment of the state of policing, published in March 2014, the Chief Inspector of Constabulary referred to the “widespread use” of performance targets, stating that “Regrettably, performance targets of this kind have in some instances become so ingrained for so long that difficulties are found in getting people to do things in a more rational and intelligent way”.<sup>73</sup> He also highlighted the importance of strong leadership in ensuring the police do act in a “more intelligent way”, stating that “it is the responsibility of police leaders to ensure that their officers and staff concentrate on what matters most, not what scores highest in the partial and impact, discredited performance measurement systems of the past.”<sup>74</sup>

85. In relation to the legacy of the target-driven culture, HMIC found that the force had “recognised the critical importance of ensuring that its culture is consistent with working in a different way, where activity is not driven primarily by numerical targets” and that “none of the staff we spoke to had any individual numerical performance targets, nor did they feel under any pressure to concentrate on numerical performance at the expense of quality and victim care.”<sup>75</sup>

**86. The vast majority of police officers joined the police in order to serve as dedicated and courageous professionals, motivated by their vocation to protect the public. However, targets, based either on Police Recorded Crime data or on other internally-generated administrative data, set by senior police officers or Police and Crime Commissioners, tend to affect attitudes, erode data quality and to distort individual and institutional behaviour and priorities.**

**87. HM Inspectorate of Constabulary’s inspection in 2013 into the Kent Police found clear evidence that targets are detrimental to the integrity of crime data. We are pleased to note that when they returned to Kent in January 2014, they found that good progress had been made in tackling this issue. HMIC’s findings in Kent are a promising indication of how a rigorous and sustained audit regime, combined with a clear**

71 HM Inspectorate of Constabulary, [Crime recording in Kent](#), 2013, p22

72 HM Inspectorate of Constabulary, [Crime recording in Kent – An interim progress report](#), 31 January 2014, p10

73 HM Inspectorate of Constabulary, [State of policing: the annual assessment of policing in England and Wales 2012/13](#), March 2014, para 95

74 HM Inspectorate of Constabulary, [State of policing: the annual assessment of policing in England and Wales 2012/13](#), March 2014, para 97

75 As above, p8

prioritisation of data integrity by senior leadership, can contribute to bringing about positive change.

88. The attitudes and behaviours which lead to the misrecording of crime have become ingrained, including within senior leadership, leading to the subordination of data integrity to target-chasing. This can present officers with a conflict between achievement of targets and core policing values. HMIC recognises this in their first Annual Assessment of the state of policing, but we are disappointed that this vital issue received only cursory attention in over 200 pages.

*89. Senior police leaders and HMIC must ensure that emphasis is placed on data integrity and accuracy, not on the direction of recorded crime trends. Formal performance appraisal should be based upon these core policing values and not based on targets derived from Police Recorded Crime data or other administrative data on their own. We are convinced that this requires leadership in many police forces to place new emphasis on values and ethics, especially in the Metropolitan Police Service. We expect HMIC to lay much stronger emphasis on this aspect of police behaviour in future Annual Assessments.*

## Broader concerns about police values

90. The doubts relating to police recording practices are just one of a range of serious concerns about values and ethical standards within the police. The Home Affairs Committee's 2013 report on Leadership and standards in the police highlighted how a "concatenation of crises risks damaging the quality of law enforcement: public faith in policing has been tested by episodes such as the findings of the Hillsborough Panel Report, the 'plebgate' incident, and the first dismissal of a chief constable in 30 years."<sup>76</sup> More recently, there have been the Operation Elveden investigation into allegations that police officers accepted money for supplying information to journalists, and the recent revelations about undercover policing in the Stephen Lawrence case.<sup>77</sup>

*91. The issues raised in this Report concerning the integrity of Police Recorded Crime statistics demonstrate the subordination of core policing values to the 'target culture'. This reflects broader concerns about policing values. We recommend that the Committee of Standards in Public Life conducts a wide-ranging inquiry into the police's compliance with the new Code of Ethics; in particular the role of leadership in promoting and sustaining these values in the face of all the other pressures on the force.*

## Whistleblowing

92. We are grateful to PC James Patrick, a serving police officer with the Metropolitan Police Service (MPS), for his courage in coming forward to voice his concerns. This was instrumental in prompting this inquiry. PC Patrick became a police officer in 2004, joining

<sup>76</sup> Home Affairs Committee, Third Report of Session 2013-14, [Leadership and standards in the police](#), HC 67-I, para 4

<sup>77</sup> [Stephen Lawrence Independent Review](#), HC 1094, March 2014

Derbyshire Police, and moved to the MPS in 2009. At the MPS, he had a growing number of concerns, some of which related to the manipulating of crime data by police officers in order to improve the crime statistics. For example, he told us that robbery offences were sometimes downgraded to 'theft-snatch' and burglaries to 'criminal damage', or that incidents were logged as 'crime-related incidents' until there was a detection, in which case the incident would then be logged as a crime.<sup>78</sup> He also believes that the misrecording of crime led to the misallocation of resources in the MPS, which in turn helped to leave the MPC ill-prepared for the summer riots in London in 2012.<sup>79</sup> PC Patrick's evidence stated that he went public with his concerns as a 'whistleblower' only after encountering resistance and obstructiveness within his force.<sup>80</sup> In 2012, he started to blog and tweet about some of his concerns (which were wider than the issue of crime statistics). Many of his blog posts were self-published in a book, "The Rest is Silence", in 2013.<sup>81</sup> In November 2012, the Metropolitan Police started to investigate him for alleged gross misconduct and he was placed on restricted duties. According to his solicitors, this was in relation to the publication of his book.<sup>82</sup> In February 2014, following a "management review" of the case by another force, at the invitation of the MPS, the charges of "gross misconduct" were dropped. Nevertheless, the MPS continued to pursue charges of "misconduct".<sup>83</sup> In March 2014, PC Patrick resigned with effect from June 2014, stating that "this resignation arises directly from my treatment [by the Metropolitan Police Service] as a result of making disclosures in good faith and in the public interest".<sup>84</sup> PC Patrick claims that he has been subject to bullying and intimidation over a long period, which has affected his physical and mental wellbeing and his family life.<sup>85</sup>

93. It would not be appropriate for us to comment on PC Patrick's disciplinary proceedings in any detail. However, there are some wider lessons to be learnt from PC Patrick's experiences. The new police code of ethics places a duty on officers to report misconduct among their peers. Norman Baker MP, Minister of State at the Home Office, also expressed his desire that officers "exercise their duty and report any conduct they believe to be inappropriate."<sup>86</sup> However, officers need to feel safe and confident that they can raise their genuine concerns without adverse repercussions. Paul Ford of the Police Federation told us that his organisation was "dealing with a lot of stifled whistleblowers", and added:

We have lots of anecdotal information but, unfortunately, people are fearful of coming forward and raising concerns. That comes down to the

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78 Q6, Q9, Q10

79 CST02, CST34

80 CST02

81 James Patrick, [The Police Debating Directive](#) blog and James Patrick, *The Rest is Silence*, published April 2013

82 Kaim Todner solicitors, [Media statement - PC James Patrick](#), 4 December 2012

83 Kaim Todner solicitors, [Media statement - PC James Patrick](#), 11 February 2014

84 James Patrick, [Statement on resignation](#), blog post on [The Candle Legacy](#) blog, 24 March 2014

85 As above

86 Q595

whistleblowing aspect of the lack of protection for people, the peer pressure and the fear factor in terms of their future.<sup>87</sup>

94. The National Audit Office recently looked at whistleblowing in their report “Making a whistleblowing policy work”.<sup>88</sup> In that report, they found that:

The departments we examined are effective at promoting internal routes to blow the whistle, but external routes for employees are less clear. We found departments offer a range of appropriate contacts internal to an organisation, but were less consistent in explaining how an individual could raise their concerns externally, and still be protected under the Public Interest Disclosure Act 1998.<sup>89</sup>

95. During the course of our inquiry we encountered some uncertainty as to which external avenues a police officer may use to make a complaint, if dissatisfied with the response after raising his or her concerns within his or her force. In particular, it is unclear whether an officer may approach the Independent Police Complaints Commission (IPPC). The Police Reform Act 2002 states that police officers cannot make a complaint to the IPPC, but IPPC’s guidance adds that:

This does not mean that a person serving with the police cannot raise concerns about the conduct of other people serving within their own force. However, the person serving with the police who raises the concern does not have any of the statutory rights of a complainant. Police forces and local policing bodies should ensure that there are adequate systems in place to support and protect people serving with the police who want to raise concerns about the conduct of their colleagues. This might include extending confidentiality to anyone raising such a concern, as far as this is possible and appropriate.<sup>90</sup>

96. We wrote on 27 January 2014 to the Home Office Minister, Norman Baker MP, to ask for further clarity on the avenues open to police whistleblowers who are not satisfied with the response received if they raise their concerns within their forces. Despite our chasing the minister and his private office, we have still not received a reply.

***97. We recommend that the Home Office clarify the current position about the external bodies a police officer may approach once internal procedures have been exhausted. We deplore the failure of the Home Office to send us a reply in time for this Report. As soon as we receive a reply, we will publish it on our website.***

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87 Q47

88 National Audit Office, [Making a whistleblowing policy work](#), March 2014

89 As above, para 8

90 Independent Police Complaints Commission, [Statutory Guidance to the police service on the handling of complaints](#), 2013

*98. We recommend that the Home Office clarifies the route open to police whistleblowers who have exhausted internal channels within their police forces. Police whistleblowers should be free to refer their allegations to the IPCC, and should, while those concerns are pending formal investigation, enjoy immunity from disciplinary proceedings in relation to actions taken in order to raise those concerns.*

*99. We recommend that Her Majesty's Inspectorate of Constabulary should investigate the Metropolitan Police Service in respect of the treatment of PC Patrick and review the internal processes and procedures of the police for dealing with whistleblowers, in order to ensure that they are treated fairly and compassionately. We further recommend that the Home Affairs Committee should inquire into these matters to ensure that whistleblowers in any police force are treated fairly and with respect and care. We have grave doubts that the Metropolitan Police Service has treated PC Patrick fairly or with respect and care.*

## 5 Monitoring and audit

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### Monitoring of crime recording since 2002

100. The National Crime Recording Standard (NCRS), introduced across England and Wales in 2002, makes clear that “an essential element of the National Standard is the need for regular and on-going local and national scrutinisation at all stages of the process.”<sup>91</sup>

101. Primary responsibility for the maintenance of crime data quality lies with each force's nominated Chief Officer. They are responsible for the accuracy and integrity of crime recording processes. In their leadership role, Chief Officers are encouraged to make an “unequivocal statement and clear commitment” to the maintenance of consistent and victim-oriented crime recording standard, and to ensure “on an ongoing basis that each force's position on crime recording [is] clearly articulated throughout the organisation”.<sup>92</sup>

102. Each Chief Officer appoints a Force Crime Registrar (FCR) to have day-to-day responsibility for accurate and consistent implementation of the NCRS. The FCR is an NCRS specialist and acts as the final arbiter of the force's internal audit process, the interpretation of the counting rules and assigning outcomes. The FCR also acts as the Force representative and Home Office contact on the subject of crime recording. The FCR is answerable to the relevant Chief Officer, but must be outside operational line command, to ensure that NCRS implementation is not subject to operational or managerial pressures that may compromise data integrity.

103. The Force Crime Registrar position is not defined consistently across police forces and the people holding that position vary in rank. For example, Sir Bernard Hogan-Howe told us that the Metropolitan Police FCR is a Chief Superintendent, a senior middle manager. However, Chief Constable Farrar observed in his evidence that at present FCRs “vary greatly in their status and grade across the country and their engagement levels with Chief Officers is also inconsistent.”<sup>93</sup>

104. In respect of external monitoring, there has not been the same imperative. There has not been a consistent ‘regular and on-going [...] national scrutinisation’ of crime recording practices across forces since 2007. During the first few years of NCRS implementation, the Audit Commission conducted a series of annual reviews of police data quality, to monitor and assess each force's progress towards compliance with the new standard. Their findings were published in three reports (for 2004, 2005 and 2006–07). By the time of the final report, the Audit Commission concluded that good progress had been made in improving the quality of recorded crime data and in increasing user satisfaction:

Thirty-eight police authorities and forces (88 per cent) have good or excellent crime data quality. This is a significant improvement from 12 (28 per cent) in

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91 Home Office, [National Crime Recording Standard](#)

92 As above, para 4.1

93 Q310, CST24, CST36



2003–04. Since 2005–06, no police authority or force has poor crime data quality. There has been a sustained improvement in crime data quality. Compliance with national standards is now built into the activity and processes of most police authorities and forces.<sup>94</sup>

105. The Audit Commission ceased its annual monitoring work on the implementation of NCRS in 2006/07. As we have discussed in this report, witnesses and the ONS have identified the discontinuation of regular annual audit as a possible contributor to the subsequent faster fall in recorded crime compared with the trend indicated by the CSEW.

106. In 2009, following the discovery of inconsistencies in the way the police were recording grievous bodily harm with intent, HMIC conducted a one-off quality review into the way in which police forces record most serious violence (which at the time was part of a central Government target). The resultant report found some variation in recording which they partly attributed to the lack of independent monitoring of crime records, following the cessation of the Audit Commission's regular reviews.<sup>95</sup>

107. Prompted by the cessation of the Audit Commission's involvement, and informed by the findings of HMIC's 2009 inspection, UKSA noted its concern over the cessation of periodic external audit in its 2010 monitoring report, "Overcoming Barriers to Trust in Crime Statistics":

There seems to be broad agreement that inspections by the Audit Commission over several years contributed to improvements in police crime recording, but these inspections have now ceased. [...] The more recent HMIC review of the way police forces record most serious violence considered that the current lack of independent monitoring was a possible contributory factor to the error rate, and concluded that there is a need for better quality assurance.<sup>96</sup>

108. In January 2011, HMIC was commissioned by the Home Office to examine how the police record, investigate and resolve crimes and incidents of anti-social behaviour.<sup>97</sup> This review looked at a small sample of crimes and incident records across all English and Welsh forces (fewer than 6,000 records in total) and found:

- Three-quarters of forces made correct crime recording decisions from incidents 90 per cent or more of the time—an average of 92 per cent of incidents correctly finalised, indicating a good overall national standard;
- Whilst the majority of police forces performed well, there remained a wide variation in the quality of decision making associated with the recording of crime (a range of

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94 Audit Commission, [Police data quality 2006/07](#), p2

95 HM Inspectorate of Constabulary, [Crime counts: A Review of Data Quality For Offences of the Most Serious Violence](#), October 2009

96 UK Statistics Authority [Overcoming Barriers to Trust in Crime Statistics](#), Monitoring Report, May 2010, para 38 and 79

97 HM Inspectorate of Constabulary, [The Crime Scene - a review of police crime and incident reports](#), January 2012

between 86 and 100 per cent from the lowest to the highest performing force) which was a cause for concern;

Limited evidence of forces directly assessing whether their own crime quality audits provided confidence that their crime figures gave an accurate account of their performance, and few forces compare crime audits with crime performance in any meaningful way.<sup>98</sup>

109. HMIC's inspection work on crime recording during 2009–2013 found that forces which demonstrated high standards of data quality possessed the following key attributes:

- A clearly identified chief officer lead acting as the force champion for data quality and sending consistent and unequivocal messages to officers about the importance of maintaining high standards in crime and incident recording;
- A strong, independent Force Crime Registrar, enjoying unequivocal chief officer support and with a reporting line not subject to operational pressures.

Chief Constable Farrar noted in his evidence that “regular, clear and consistent Chief Officer engagement with FCRs is believed to be important in providing FCRs with independence from target cultures and so enabling them to ensure crime is accurately recorded.”<sup>99</sup>

## HMIC's 2014 Crime Data integrity inspection

110. In April 2013 HMIC announced plans to conduct a crime data integrity inspection in all 43 forces as part of its 2013-14 inspection programme, and confirmed this commitment to the Home Affairs Committee in May 2013.<sup>100</sup> The inspection was prompted by the HMIC's findings in Kent, which we consider earlier in this report.<sup>101</sup> The Home Secretary wrote to HMIC in June 2013 to approve of the HMIC's initiative, remarking that “it is vital that the public have access to transparent and trustworthy statistics on recorded crime [...]. It is clearly critical a report on this is published within the new inspection period.”<sup>102</sup> Initial findings will be provided in an interim report (as requested by the Home Secretary) in April 2014, with a final report to follow later in the year.<sup>103</sup>

111. The HMIC's previous inspections of data quality across forces were limited in scope—both Crime Counts (2009) and The Crime Scene (2012) only considered crime and incident records resulting from telephone calls to force crime centres, and examined only a small sample of such records. HMIC has assured us that the current inspection will encompass the various routes by which crimes can be reported to the police. It will address

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98 HM Inspectorate of Constabulary, [The Crime Scene - a review of police crime and incident reports](#), January 2012

99 CST24

100 Home Affairs Committee, Third Report of Session 2013-14, [Leadership and standards in the police](#), HC 67-I, Q602-603

101 Q411 and Q416 [Tom Winsor]

102 Letter from Home Secretary Rt Hon Theresa May MP to Chief Inspector of Constabulary Tom Winsor, 10 June 2013

103 Q21 [Tom Winsor]

key issues such as the quality of leadership and governance, the quality of internal audit processes and the role of the Force Crime Registrar, how effectively victims are placed at the centre of crime recording decisions, and the extent to which no-crime decisions correctly adhere to the NCRS.

112. In December 2013, the Home Office announced £9.4 million funding for regular annual all-force audit by HMIC.<sup>104</sup> Tom Winsor told us that “I have every expectation, although we are still doing the planning on this, that the integrity of crime recording will be part of [the annual audit]”.<sup>105</sup> Although HMIC were unable to confirm for us how much of the £9.4 million would be devoted to crime data integrity, they did tell us that “this year’s crime data inspection is costing just over £1 million, to give you an order of magnitude.”<sup>106</sup>

113. This intensified scrutiny of police recording practices and the focus on compliance with prescribed procedures may lead to concerns that the police are being burdened with additional red-tape and distracted from their core role of fighting crime. However, reliable crime recording is a bedrock of core policing work and of the service provided to the public, a point emphasised by several witnesses. Sir Andrew Dilnot, Chair of UKSA, told us:

My own view is that the imposition of rigorous external independent audit should not be a red-tape exercise. That is not what it is. Internal audit can be a red-tape exercise, but external audit is something coming in that should not take very large and significant resources from the police.<sup>107</sup>

Ed Humpherson, head of assessment at UKSA, stressed that:

the systems of assurance that we have been describing—such as the regular auditing—are not add-ons simply for the purpose of satisfying the Authority for designation as an official statistic; they are operational needs to support decision making in every police force.<sup>108</sup>

While Peter Barron [retired Detective Chief Superintendent,]at the Metropolitan Police Service, considered that:

those that describe HOCR [Home Office Counting Rules], NCRS [the National Crime Recording Standard] and NSIR [the National Standard of Incident Recording] as unnecessary bureaucracies do so because they provide a level of accuracy and consistency that challenge unsustainable claims of enhanced performance.<sup>109</sup>

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104 HC Deb, 18 Dec 2013, [col 111-118WS](#)

105 Q416

106 Q439 and Q445

107 Q509

108 Q509

109 CST03

114. We welcome HM Inspectorate of Constabulary's decision to undertake a data integrity inspection in 2014, and its commitment to reinstating an annual external audit programme. We welcome the extra funding provided by the Home Office for regular annual audit of all forces.

*115. We recommend that HMIC confirm that a rigorous audit of crime recording integrity will form a permanent part of these audits. Audits should ensure that the senior leadership within each force articulates the importance of data integrity to its officers. It is therefore essential that the Force Crime Registrar has not only had the requisite training but the necessary authority within the force to do their job. HMIC should identify a minimum suitable rank for FCRs, such as Deputy Chief Constable or equivalent, and FCRs should report directly to the force Commander.*

*116. We recommend that the current audit should examine the reasons for misrecording, such as the effect of performance culture (identifying instances where targets drive perverse incentives), poor understanding of counting rules, inadequate training and deliberate malpractice.*

117. The Chief Inspector of Constabulary assured us that HMIC is “completely independent” in its judgements and has “no allegiance, other than to the public interest and to the law.” This is not self-evident, given the numerous instances of HMIC inspectors moving from and into senior positions within police forces. It is therefore vital to the credibility of HMIC's annual audit of crime recording that this independence of judgement be maintained and be seen to be maintained.

## 6 Police and Crime Commissioners

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118. Police and Crime Commissioners (PCCs) are elected, and have assumed responsibility for setting policing priorities and the power to hire and fire the Chief Constable. They are accountable to the local electorate for the performance of the local police force in tackling crime and anti-social behaviour. There is therefore a danger that central Government's efforts to remove targets will be undermined by locally-set targets and electoral pressures.

119. A number of PCCs have refused to set numerical targets, mindful of their distorting effects. For example, Nick Alston, PCC in Essex, told us:

reducing numerical targets seemed to be absolutely key, so I took away the numerical targets from Essex policing. [...] I am very aware of the susceptibility of crime statistics to be worked in all sorts of different ways.<sup>110</sup>

120. During the course of this inquiry, we wrote, on 6 December 2013, to all 43 Police and Crime Commissioners in England and Wales to ask them:

- What, if any, targets they set for their police force and what impact they think this has on police recording crime practices.
- How they assure themselves that the recorded crime figures for their area are correct and to what extent can they trust the crime statistics for their area.

121. The replies are published on our website as evidence to this inquiry, along with evidence submitted by some PCCs to our original call for evidence. Three PCCs gave oral evidence to PASC on 19 November 2013, the Deputy Mayor of London, who acts as PCC for London gave oral evidence on 8 January 2014, and three different PCCs gave oral evidence to the Home Affairs Committee on 26 November 2013.<sup>111</sup> (Some of those PCCs who gave oral evidence also submitted written evidence.)

122. Out of the 42 pieces of written and oral evidence from PCCs, 16 PCCs told us they have set specific numerical targets in their local Police and Crime Plans, such as “to achieve a 12% reduction in overall crime” (Hampshire) or “to reduce burglary by 8%” (Thames Valley). A notable example of this is the Metropolitan Police: the Mayor's Office for Policing and Crime (MOPAC) has set a range of targets under the heading ‘MOPAC 20/20/20’—including a target to reduce the ‘MOPAC 7’ group of offences by 20%. The Deputy Mayor of London for Policing told the Committee that the target was designed to mitigate risks (sexual offences are excluded from the target, while acquisitive crimes cannot easily be reclassified/downgraded out of the scope of MOPAC 7 as the relevant categories are included).<sup>112</sup>

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110 Q92

111 Oral evidence taken before the Home Affairs Committee, [26 November 2013](#), HC (2013-14) 757-i

112 Q367 [Stephen Greenhalgh]

123. The definition of 'target' is a grey area however. The Wiltshire PCC has "thresholds" which are numerical and indicate the upper and lower boundaries between which he would expect his own force's performance to sit. Most of the other PCCs have some kind of "performance measures" or "ambitions", which, whilst not being numerical, are in place in order for the PCC to indicate expected performance from the local force. For example, the Avon and Somerset PCC has set the ambition for the burglary crime rate to be in the "top 10" performing forces.

124. A number of PCCs, such as the PCC for Essex, stated they were concerned about the perverse incentives targets can introduce, leading to misrecording of crime. Several stated that, on becoming the PCC, they had explicitly done away with targets. However, others stated that it was important to have at least some performance measures as part of their role in holding the local police force to account, setting expectations and meeting the wishes of the public. Most stated that performance measures were only part of the way in which they monitored the performance of the police and that they had measures in place to mitigate the risks that targets might introduce.

125. Several PCCs mentioned that in some areas they would welcome an *increase* in the recorded incidence of some types of crime, if this was because more victims were coming forward, for example, in reporting rapes.

**126. The Police and Crime Commissioner (PCC) role, and the political and electoral pressures that PCCs are subject to, has the potential to foster target cultures within forces, with consequent perverse incentives and detrimental impact on data quality. There is considerable variance across the country in the use of targets by PCCs.**

*127. Some PCCs consider the perverse incentives created by targets to be so serious that they have dropped all targets. Others believe the risk is manageable. As part of its annual audit programme, HMIC should examine the effect of PCC target-setting on crime recording practices and culture, and should in due course look back at the first PCC period in office to assess the impact on data integrity of locally-set targets.*

*128. The Home Office, which claims credit for abolishing national numerical targets, should make clear in its guidance to PCCs that they should not set performance targets based on Police Recorded Crime data as this tends to distort recording practices and to create perverse incentives to misrecord crime. The evidence for this is incontrovertible. In the meantime, we deprecate such target setting in the strongest possible terms. Police Recorded Crime data should not be used as the basis for personal performance appraisal or for making decisions about remuneration or promotion. We regard such practice as a flawed leadership model, contrary to the policing Code of Ethics.*

## Conclusions and recommendations

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### Police Recorded Crime (PRC)

1. Our inquiry covered crime statistics in England and Wales. However, it would be surprising if similar issues to do with the quality of the statistics did not exist in Northern Ireland and Scotland. HM Inspectorate of Constabulary for Scotland's recent review into compliance of police recording with the expected standards gives cause for concern—the recording of some crime types falls well below the expected standard. (Paragraph 7)
2. We recommend that UKSA urgently investigate the quality of crime statistics in Scotland and Northern Ireland and their compliance with the Code of Practice, in the light of the findings of this inquiry, and UKSA's decision to remove the 'National Statistics' kitemark from crime statistics in England and Wales. (Paragraph 8)
3. Accurate Police Recorded Crime data is essential if Police and Crime Commissioners and Chief Constables are to know what crimes are being committed in their area and therefore how to respond. (Paragraph 13)
4. It is not credible to suggest that sensible resolution of the tensions between a rigid compliance with the recording rules and a common-sense approach can explain the exaggerated decline of Police Recorded Crime. Our witnesses provided a wealth of insight into the various ways in which crime data accuracy and integrity can be and have been compromised. However, the lack of regular and rigorous audit of crime recording practices in recent years makes it impossible to assess the extent of any compromise and the relative importance of these factors. The re-establishment of regular annual external audit of forces from this year onwards, which we discuss later in this Report, provides a vital opportunity to fill this gap in the understanding of the problem and to contribute towards a durable solution. (Paragraph 29)
5. It is vital that the Government ensures the accuracy and reliability of Police Recorded Crime. Police Recorded Crime provides a crucial intelligence resource for the police and informs the operational deployment of police resources. Lax supervision of recorded crime data risks reducing the police's effectiveness in their core role of protecting the public and preventing crime because they cannot deploy resource effectively if they are not aware of the true level and nature of crime. (Paragraph 30)
6. Under-recording or miscategorising crime erodes public trust in the police and undermines the trust and confidence of frontline police officers in police leadership: it creates doubt that the public will be taken seriously when they report a crime. (Paragraph 31)
7. Any instance of deliberate misrecording of sexual offences is deplorable, but especially so if this has been brought about by means of improperly persuading or pressurising victims into withdrawing or downgrading their report. (Paragraph 39)
8. The disparities between different police forces in the 'no-crime rates' for rapes and sexual offences are sufficient in our view to raise serious concerns about the varying

approaches taken by police forces to recording and investigating these horrendous crimes. We look forward to the outcome of the research commissioned by the Metropolitan Police examining the force's 'no crime' decisions in respect of sexual offences. (Paragraph 40)

9. The fact that this research is necessary, following the 2008 Independent Police Complaints Commission report into the Sapphire Unit is a damning indictment of police complacency, inertia and lack of leadership. However, the data indicates that the Metropolitan Police Service is unlikely to be the only force of concern. (Paragraph 41)
10. *The Home Office must undertake a comprehensive analysis in order to explain the extraordinary disparities in no-crime rates for sexual offences across all police forces. We expect this to be completed within two months and included with the response to this Report. We also recommend that the devolved administrations undertake analogous work. This should lead to work to improve the accuracy transparency and reliability of police recorded sexual offences so that a table of no crime rates does not suggest systemic inconsistency in recording practices.* (Paragraph 42)
11. We note the reduction in the sample size of the Crime Survey for England and Wales. Police Recorded Crime is the only detailed indicator of crime trends at local level, enabling police forces, Police and Crime Commissioners, local authorities, the public and the Home Office to keep track of crime in different force area. The Crime Survey for England and Wales is no substitute for Police Recorded Crime in respect of monitoring crime trends in local areas. (Paragraph 45)
12. We recommend that the ONS review and then publish, alongside the Crime Survey for England and Wales, information about the nature of the sample, including the impact of the reduction in sample size on the reliability of the statistics, its cost over time, and an explanation of what statistics might be published at a sub-national level, for example for the larger police forces. (Paragraph 46)

### Removal of National Statistics status

13. We commend UKSA for acting in response to the evidence exposed by PASC's inquiry, to strip Police Recorded Crime statistics of the quality designation 'National Statistics'. However, the fact that it took our inquiry, and a whistleblower from the Metropolitan Police Service, to expose sufficient evidence suggests serious shortcomings in UKSA's ability and capacity in their assessment function. We acknowledge their recent decision to remove the designation 'National Statistics', but this cannot mitigate what amounts to a long-standing failure of a number of bodies to address the thoroughness of the assessment of Police Recorded Crime, despite a series of previous reviews which identified shortcomings. (Paragraph 54)
14. This raises serious concerns around the decision to designate Police Recorded Crime as National Statistics in 2011. It has been quoted by ministers that the ONS described the system for recording crime in England and Wales as "one of the best in the world" in 2012. This was after the cessation of regular external audit of force crime recording in 2007. All can see now that this reflected a lamentable complacency. The then National Statistician took no action at that time. This was wrong—the then



National Statistician, or UKSA, once established, should have pressed for other process to be put in place to ensure the integrity of crime data. (Paragraph 55)

15. The reviews of crime statistics by UKSA and the ONS in 2011 failed to expose the unreliability of recording practices within police forces themselves. An opportunity was therefore missed to gather evidence and identify issues which could have called into question the designation of Police Recorded Crime as 'National Statistics' at a much earlier stage. (Paragraph 56)
16. It is deplorable that ONS can have overseen the production of crime statistics, which were a set of National Statistics, with what appears to have been very limited knowledge of the 'quality assurance' steps that the data went through before being sent to the ONS. The ONS has been too reliant on too little information about the audits performed within police forces or by HM Inspectorate of Constabulary. Overall, the ONS has been too passive in carrying out their duties in relation to crime statistics. This cannot continue. (Paragraph 57)
17. The fragmentation of responsibility between individual forces, Home Office and the ONS was not satisfactory and contributed to the failure of the Police Recorded Crime series to meet the standards of the Code of Practice with which official statistics must comply. No single organisation has taken overall responsibility or accountability for ensuring an acceptable quality of crime statistics, which has led to their inadequate quality. (Paragraph 58)
18. *We endorse UKSA's recommendation that the ONS should publish a clear statement of the respective roles and responsibilities of the Home Office and the ONS in the production of Police Recorded Crime statistics.* (Paragraph 59)
19. *We recommend UKSA works closely with the Home Office in its role as the first recipient of raw data from forces, and ensures the Home Office takes active primary operational responsibility and accepts accountability for ensuring the integrity of the data which it collates, validates and submits to the ONS for publication. UKSA should hold the Home Office directly accountable for its role in the recorded crime statistics process, including its validation and quality assurance processes as well as its policy guidance to forces and Police and Crime Commissioners, and should in future examine the Home Office's processes and procedures directly rather than at one remove.* (Paragraph 60)

20. The Crime Statistics Advisory Committee (CSAC), which contains representation of all of the main stakeholders in the crime statistics production process as well as the Chief Inspector of Constabulary, has failed. It has not demonstrated sufficient independence and objectivity in carrying out its role to ensure recorded crime statistics are “accurate, clearly presented, comprehensive, transparent and trustworthy” as set out in its terms of reference. CSAC has a vital role in leading the efforts to provide that the system guarantees the reliability and integrity of all crime statistics emerge strengthened from this episode. (Paragraph 61)
21. *We recommend that UKSA should review the role and composition of CSAC and the structures supporting the production of crime statistics, just as it has recently with a similar committee advising on inflation figures, to ensure that CSAC is independent and rigorous and that these statistics best meet user needs in future.* (Paragraph 62)
22. We welcome UKSA’s comments that it intends to prioritise in its workplan the reassessment of National Statistics based on administrative datasets, taking on board the lessons learned from the declassification of Police Recorded Crime. (Paragraph 64)
23. *UKSA must not in future grant to, or maintain, the kitemark of ‘National Statistics’ on any set of statistics where it has failed to verify whether the underlying data meets the standard required. They should, as a matter of urgency, review all other similar statistics where collection processes are beyond the control of the ONS. UKSA should review the Code of Practice for Official Statistics to determine whether it needs to be revised to allow for the new emphasis on administrative data.* (Paragraph 65)

### Police leadership, values and culture

24. We welcome the adoption of the new statutory Code of Ethics setting out the principles and standards of professional behaviour expected of the police in England and Wales. This is most important in respect of the training of police leadership. (Paragraph 70)
25. *We recommend that the Home Office and College of Policing make a more explicit statement of how the Code of Ethics’ enforcement framework will impose a duty of data integrity on police officers in respect of crime recording practices, and that penalties will apply in the event of deliberate non-compliance. They must also ensure that officers are familiar with the victim-focussed principles of the National Crime Recording Standard and the distinction between recording standards and charging standards.* (Paragraph 71)
26. The vast majority of police officers joined the police in order to serve as dedicated and courageous professionals, motivated by their vocation to protect the public. However, targets, based either on Police Recorded Crime data or on other internally-generated administrative data, set by senior police officers or Police and Crime Commissioners, tend to affect attitudes, erode data quality and to distort individual and institutional behaviour and priorities. (Paragraph 86)
27. HM Inspectorate of Constabulary’s inspection in 2013 into the Kent Police found clear evidence that targets are detrimental to the integrity of crime data. We are

pleased to note that when they returned to Kent in January 2014, they found that good progress had been made in tackling this issue. HMIC's findings in Kent are a promising indication of how a rigorous and sustained audit regime, combined with a clear prioritisation of data integrity by senior leadership, can contribute to bringing about positive change. (Paragraph 87)

28. The attitudes and behaviours which lead to the misrecording of crime have become ingrained, including within senior leadership, leading to the subordination of data integrity to target-chasing. This can present officers with a conflict between achievement of targets and core policing values. HMIC recognises this in their first Annual Assessment of the state of policing, but we are disappointed that this vital issue received only cursory attention in over 200 pages. (Paragraph 88)
29. *Senior police leaders and HMIC must ensure that emphasis is placed on data integrity and accuracy, not on the direction of recorded crime trends. Formal performance appraisal should be based upon these core policing values and not based on targets derived from Police Recorded Crime data or other administrative data on their own. We are convinced that this requires leadership in many police forces to place new emphasis on values and ethics, especially in the Metropolitan Police Service. We expect HMIC to lay much stronger emphasis on this aspect of police behaviour in future Annual Assessments.* (Paragraph 89)
30. *The issues raised in this Report concerning the integrity of Police Recorded Crime statistics demonstrate the subordination of core policing values to the 'target culture'. This reflects broader concerns about policing values. We recommend that the Committee of Standards in Public Life conducts a wide-ranging inquiry into the police's compliance with the new Code of Ethics; in particular the role of leadership in promoting and sustaining these values in the face of all the other pressures on the force.* (Paragraph 91)
31. *We recommend that the Home Office clarify the current position about the external bodies a police officer may approach once internal procedures have been exhausted. We deplore the failure of the Home Office to send us a reply in time for this Report. As soon as we receive a reply, we will publish it on our website.* (Paragraph 97)
32. *We recommend that the Home Office clarifies the route open to police whistleblowers who have exhausted internal channels within their police forces. Police whistleblowers should be free to refer their allegations to the IPCC, and should, while those concerns are pending formal investigation, enjoy immunity from disciplinary proceedings in relation to actions taken in order to raise those concerns.* (Paragraph 98)

33. *We recommend that Her Majesty's Inspectorate of Constabulary should investigate the Metropolitan Police Service in respect of the treatment of PC Patrick and review the internal processes and procedures of the police for dealing with whistleblowers, in order to ensure that they are treated fairly and compassionately. We further recommend that the Home Affairs Committee should inquire into these matters to ensure that whistleblowers in any police force are treated fairly and with respect and care. We have grave doubts that the Metropolitan Police Service has treated PC Patrick fairly or with respect and care. (Paragraph 99)*

### Monitoring and audit

34. We welcome HM Inspectorate of Constabulary's decision to undertake a data integrity inspection in 2014, and its commitment to reinstating an annual external audit programme. We welcome the extra funding provided by the Home Office for regular annual audit of all forces. (Paragraph 114)
35. *We recommend that HMIC confirm that a rigorous audit of crime recording integrity will form a permanent part of these audits. Audits should ensure that the senior leadership within each force articulates the importance of data integrity to its officers. It is therefore essential that the Force Crime Registrar has not only had the requisite training but the necessary authority within the force to do their job. HMIC should identify a minimum suitable rank for FCRs, such as Deputy Chief Constable or equivalent, and FCRs should report directly to the force Commander. (Paragraph 115)*
36. *We recommend that the current audit should examine the reasons for misrecording, such as the effect of performance culture (identifying instances where targets drive perverse incentives), poor understanding of counting rules, inadequate training and deliberate malpractice. (Paragraph 116)*
37. The Chief Inspector of Constabulary assured us that HMIC is “completely independent” in its judgements and has “no allegiance, other than to the public interest and to the law.” This is not self-evident, given the numerous instances of HMIC inspectors moving from and into senior positions within police forces. It is therefore vital to the credibility of HMIC's annual audit of crime recording that this independence of judgement be maintained and be seen to be maintained. (Paragraph 117)

### Police and Crime Commissioners

38. The Police and Crime Commissioner (PCC) role, and the political and electoral pressures that PCCs are subject to, has the potential to foster target cultures within forces, with consequent perverse incentives and detrimental impact on data quality. There is considerable variance across the country in the use of targets by PCCs. (Paragraph 126)

39. *Some PCCs consider the perverse incentives created by targets to be so serious that they have dropped all targets. Others believe the risk is manageable. As part of its annual audit programme, HMIC should examine the effect of PCC target-setting on crime recording practices and culture, and should in due course look back at the first PCC period in office to assess the impact on data integrity of locally-set targets. (Paragraph 127)*
  
40. *The Home Office, which claims credit for abolishing national numerical targets, should make clear in its guidance to PCCs that they should not set performance targets based on Police Recorded Crime data as this tends to distort recording practices and to create perverse incentives to misrecord crime. The evidence for this is incontrovertible. In the meantime, we deprecate such target setting in the strongest possible terms. Police Recorded Crime data should not be used as the basis for personal performance appraisal or for making decisions about remuneration or promotion. We regard such practice as a flawed leadership model, contrary to the policing Code of Ethics. (Paragraph 128))*

# Formal Minutes

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**Tuesday 1 April 2014**

Members present:

Mr Bernard Jenkin, in the Chair

Sheila Gilmore

Lindsay Roy

Kelvin Hopkins

Mr Andrew Turner

Greg Mulholland

Draft Report (*Caught red-handed: Why we can't count on Police Recorded Crime statistics*), proposed by the Chair, brought up and read.

*Ordered*, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 128 read and agreed to.

Summary agreed to.

*Resolved*, That the Report be the Thirteenth Report of the Committee to the House.

*Ordered*, That the Chair make the Report to the House.

*Ordered*, That embargoed copies of the Report be made available (Standing Order No. 134).

[Adjourned till Tuesday 8 April at 9:15am

## Witnesses

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The following witnesses gave evidence. Transcripts can be viewed on the Committee's inquiry page at [www.parliament.uk/pasc](http://www.parliament.uk/pasc).

### Tuesday 19 November 2013

*Question number*

**James Patrick**, Police Constable, Metropolitan Police, **Paul Ford**, Secretary, National Detectives' Forum, Police Federation, **Dr Rodger Patrick**, former Chief Inspector, West Midlands Police and **Peter Barron**, former Detective Chief Superintendent, Metropolitan Police

**Ann Barnes**, Police and Crime Commissioner for Kent, **Alan Pughsley**, Deputy Chief Constable, Kent Police, **Nick Alston**, Police and Crime Commissioner for Essex, and **Paddy Tipping**, Police and Crime Commissioner for Nottinghamshire

[Q1-135](#)

### Wednesday 11 December 2013

**Professor Stephen Shute**, Chair and **Professor Mike Hough**, Member, Crime, Statistics Advisory Committee

**Chief Constable Jeff Farrar**, National Lead on Crime Statistics, acting on behalf of the Association of Chief Police Officers

[Q136-283](#)

### Wednesday 8 January 2014

**Stephen Greenhalgh**, Deputy Mayor of London and **Sir Bernard Hogan-Howe**, Commissioner, Metropolitan Police

**Tom Winsor**, Her Majesty's Chief Inspector of Constabulary, and **Olivia Pinkney**, Assistant Inspector of Constabulary, HM Inspectorate of Constabulary

[Q284-462](#)

### Tuesday 21 February 2014

**Sir Andrew Dilnot**, Chair, UK Statistics Authority, **Ed Humpherson**, Head of Assessment, UK Statistics Authority, **Jil Matheson**, National Statistician, Office for National Statistics, and **John Flatley**, Head of Crime Statistics

**Norman Baker MP**, Minister of State for Crime Prevention, and **Professor Bernard Silverman**, Chief Scientific Adviser, Home Office

[Q463-603](#)

## Published written evidence

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The following written evidence was received and can be viewed on the inquiry page at [www.parliament.uk/pasc](http://www.parliament.uk/pasc). CST numbers are generated by the evidence processing system and so may not be complete.

- 1 Anonymous ([CST0028](#))
- 2 Association of Police and Crime Commissioners ([CST0016](#))
- 3 Barron, Peter ([CST0003](#))
- 4 Bennett, Steve ([CST0013](#))
- 5 Bligh, Professor Donald ([CST0059](#))
- 6 Brimicombe, Professor Allan ([CST0008](#))
- 7 Cavendish, Edmund ([CST0032](#))
- 8 City of London Corporation ([CST0052](#))
- 9 Committee on Standards in Public Life ([CST0006](#))
- 10 Deputy Mayor for Policing and Crime ([CST0019](#))
- 11 Farrar, Jeff ([CST0024](#), [CST0035](#))
- 12 Ford, Michael ([CST0027](#))
- 13 Gilbertson, David ([CST0001](#))
- 14 Grove, Matthew ([CST0009](#))
- 15 Guilfoyle, Simon ([CST0026](#))
- 16 Guy, Stephen ([CST0029](#))
- 17 Her Majesty's Inspectorate of Constabulary ([CST0015](#))
- 18 Hobbs, Chris ([CST0018](#), [CST0043](#))
- 19 Home Office ([CST0021](#))
- 20 Hope, Professor Tim ([CST0004](#))
- 21 Local Government Association ([CST0012](#))
- 22 Patrick, Dr Rodger ([CST0005](#))
- 23 Patrick, James ([CST0002](#), [CST0034](#), [CST0073](#))
- 24 Police and Crime Commissioner, Avon and Somerset ([CST0053](#))
- 25 Police and Crime Commissioner, Bedfordshire ([CST0071](#))
- 26 Police and Crime Commissioner, Cambridgeshire ([CST0060](#))
- 27 Police and Crime Commissioner, Cheshire ([CST0040](#))
- 28 Police and Crime Commissioner, Cleveland ([CST0067](#))
- 29 Police and Crime Commissioner, Cumbria ([CST0055](#))
- 30 Police and Crime Commissioner, Derbyshire ([CST0063](#))
- 31 Police and Crime Commissioner, Devon and Cornwall ([CST0047](#))
- 32 Police and Crime Commissioner, Dorset ([CST0056](#))
- 33 Police and Crime Commissioner, Durham ([CST0039](#))
- 34 Police and Crime Commissioner, Dyfed-Powys ([CST0057](#))
- 35 Police and Crime Commissioner, Gloucestershire ([CST0044](#))
- 36 Police and Crime Commissioner, Greater Manchester ([CST0061](#))
- 37 Police and Crime Commissioner, Gwent ([CST0062](#))
- 38 Police and Crime Commissioner, Hampshire and Isle Of Wight ([CST0069](#))
- 39 Police and Crime Commissioner, Herts ([CST0078](#))



- 40 Police and Crime Commissioner, Lancashire ([CST0058](#))
- 41 Police and Crime Commissioner, Leicestershire ([CST0076](#))
- 42 Police and Crime Commissioner, Lincolnshire ([CST0064](#))
- 43 Police and Crime Commissioner, Norfolk ([CST0066](#))
- 44 Police and Crime Commissioner, North Wales ([CST0050](#))
- 45 Police and Crime Commissioner, North Yorkshire ([CST0070](#))
- 46 Police and Crime Commissioner, Northamptonshire ([CST0075](#))
- 47 Police and Crime Commissioner, Northumbria ([CST0072](#))
- 48 Police and Crime Commissioner, Nottingham ([CST0054](#))
- 49 Police and Crime Commissioner, South Wales ([CST0045](#))
- 50 Police and Crime Commissioner, South Yorkshire ([CST0068](#))
- 51 Police and Crime Commissioner, Suffolk ([CST0048](#))
- 52 Police and Crime Commissioner, Surrey ([CST0037](#))
- 53 Police and Crime Commissioner, Sussex ([CST0051](#))
- 54 Police and Crime Commissioner, Warwickshire ([CST0065](#))
- 55 Police and Crime Commissioner, West Mercia ([CST0074](#))
- 56 Police and Crime Commissioner, West Yorkshire ([CST0046](#))
- 57 Police and Crime Commissioner, Wiltshire and Swindon ([CST0049](#))
- 58 Secretariat for the Crime Statistics Advisory Committee ([CST0007](#))
- 59 Simon, Jonathan ([CST0030](#))
- 60 Stubbs, Edward ([CST0023](#))
- 61 Sussex Police and Crime Commissioner ([CST0014](#))
- 62 Thames Valley Police and Crime Commissioner ([CST0038](#))
- 63 UK Statistics Authority ([CST0017](#))
- 64 West Midlands Police ([CST0036](#))
- 65 White, Michael ([CST0010](#))
- 66 Wilce, Ra ([CST0031](#))

## List of Reports from the Committee during the current Parliament

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All publications from the Committee are available on the Committee's website at [www.parliament.uk/pasc](http://www.parliament.uk/pasc). The reference number of the Government's response to each Report is printed in brackets after the HC printing number.

### Session 2013–14

First Special Report	Public Trust in Government Statistics: A review of the operation of the Statistics and Registration Service Act 2007: Government and UK Statistics Authority Responses to the Committee's Ninth Report of Session 2012–13	HC 77
Second Special Report	Special advisers in the thick of it: Government Response to the Committee's Sixth Report of Session 2012–13	HC 515
First Report	Communicating statistics: not just true but also fair	HC 190 (HC 573)
Second Report	Public engagement in policy-making	HC 75 (HC 986)
Third Report	The role of the Charity Commission and "public benefit": Post-Legislative scrutiny of the Charities Act 2006	HC 76 (HC 927)
Fourth Report	Engaging the public in National Strategy	HC 435
Fifth Report	Appointment of the Chair of the Committee on Standards in Public Life	HC 516
Sixth Report	Government Procurement	HC 123 (HC 105)
Seventh Report	Migration Statistics	HC 523
Eighth Report	Truth to Power: how Civil Service reform can succeed	HC 74 (HC 955)
Ninth Report	Latest proposals for ministerial involvement in permanent secretary appointments: PASC's recommendations	HC 1041
Tenth Report	Statistics and Open Data: Harvesting unused knowledge, empowering citizens and improving public services	HC 564
Eleventh Report	The failure of the Cabinet Office to respond to our Report on the Business Appointment Rules	HC 1156
Twelfth Report	More complaints please!	HC 229

**Session 2012–13**

First Special Report	Public Appointments: regulation, recruitment and pay: Government Response to the Committee's Fourteenth Report of Session 2010–12	HC 18
Second Special Report	Leadership of change: new arrangements for the roles of the Head of the Civil Service and the Cabinet Secretary: Further Report: Government Response to the Committee's Twenty Third Report of Session 2010–12	HC 313
Third Special Report	Strategic thinking in Government: without National Strategy, can viable Government strategy emerge? Government Response to the Committee's Twenty Fourth Report of Session 2010–12	HC 573
Fifth Special Report	The Prime Minister's Adviser on Ministers' Interests: independent or not? Government Response to the Committee's Twenty Second Report of Session 2010–12	HC 976
First Report	The Big Society: Further Report with the Government Response to the Committee's Seventeenth Report of Session 2010–12	HC 98
Second Report	The Honours System	HC 19
Third Report	Business Appointment Rules	HC 404
Fourth Report	Appointment of the Chair of the Charity Commission	HC 315-I
Fifth Report	End of term report: 2011–12	HC 316
Sixth Report	Special advisers in the thick of it	HC 134
Seventh Report	The Honours System: Further Report with the Government Response to the Committee's Second Report of Session 2012–13	HC 728
Eighth Report	The Role of the Cabinet Secretary and the Resignation of the Chief Whip	HC 864 (HC 968)
Ninth Report	Public Trust in Government Statistics, A review of the operation of the Statistics and Registration Service Act 2007	HC 406

**Session 2010–12**

First Report	Who does UK National Strategy?	HC 435 (HC 713)
Second Report	Government Responses to the Committee's Eighth and Ninth Reports of Session 2009–10: Goats and Tsars: Ministerial and other appointments from outside Parliament and Too Many Ministers?	HC 150
Third Report	Equitable Life	HC 485 (Cm 7960)
Fourth Report	Pre-appointment hearing for the dual post of First Civil Service Commissioner and Commissioner for Public Appointments	HC 601
Fifth Report	Smaller Government: Shrinking the Quango State	HC 537 (Cm 8044)
Sixth Report	Who Does UK National Strategy? Further Report with the Government Response to the Committee's First Report of Session 2010–11	HC 713
Seventh Report	Smaller Government: What do Ministers do?	HC 530 (HC 1540)
Eighth Report	Cabinet Manual	HC 900 (HC 1127, Cm 8213)

Ninth Report	Pre-appointment hearing for the post of Parliamentary and Health Service Ombudsman	HC 1220-I
Tenth Report	Remuneration of the Parliamentary and Health Service Ombudsman	HC 1350
Eleventh Report	Good Governance and Civil Service Reform: 'End of Term' report on Whitehall plans for structural reform	HC 901 ( <i>HC 1746</i> )
Twelfth Report	Government and IT—"a recipe for rip-offs": time for a new approach	HC 715-I ( <i>HC 1724</i> )
Thirteenth Report	Change in Government: the agenda for leadership	HC 714 ( <i>HC 1746</i> )
Fourteenth Report	Public Appointments: regulation, recruitment and pay	HC 1389
Fifteenth Report	Smaller Government: What do Ministers do? Further Report with the Government Response to the Committee's Seventh Report of Session 2010–12	HC 1540 ( <i>HC 1746</i> )
Sixteenth Report	Appointment of the Chair of the UK Statistics Authority	HC 910
Seventeenth Report	The Big Society	HC 902
Eighteenth Report	Change in Government: the agenda for leadership: Further Report, with the Government Responses to the Committee's Eleventh, Thirteenth and Fifteenth Reports of Session 2010–12	HC 1746
Nineteenth Report	Leadership of change: new arrangements for the roles of the Head of the Civil Service and the Cabinet Secretary	HC 1582
Twentieth Report	Government and IT—"a recipe for rip-offs": time for a new approach: Further Report, with the Government response to the Committee's Twelfth Report of Session 2010–12	HC 1724
Twenty First Report	Future oversight of administrative justice: the proposed abolition of the Administrative Justice and Tribunals Council	HC 1621
Twenty Second Report	The Prime Minister's adviser on Ministers' interests: independent or not?	HC 1761
Twenty Third Report	Leadership of change: new arrangements for the roles of the Head of the Civil Service and the Cabinet Secretary, Further Report, with the Government Response to the Committee's Nineteenth Report of Session 2010–12	HC 1914
Twenty Fourth Report	Strategic thinking in Government: without National Strategy, can viable Government strategy emerge?	HC 1625