



---

The Office of Matthew Grove

*Working hard to keep you safe*

---

Mail Room  
Force Headquarters  
Hull  
HU5 5SF  
[www.humberside-pcc.gov.uk](http://www.humberside-pcc.gov.uk)

The Rt Hon Theresa May MP  
Home Secretary  
2 Marsham Street  
London  
SW1P 4DF

**Contact:** Matthew Grove  
**Tel:** 01482 220787  
**e-mail:** [pcc@humberside.pnn.police.uk](mailto:pcc@humberside.pnn.police.uk)  
**Our ref:** MG/MS/2014

26 September 2014

Dear Home Secretary

### **Crime Data Integrity – HMIC Inspection of Humberside Police**

I am writing to you with my comments on the recent HMIC report entitled "*Crime data integrity – Inspection of Humberside Police*". The report makes for both interesting and challenging reading.

I made it very clear in my Police and Crime Plan back in November 2012 that I would not be setting any specific numerical targets. This was in-line with your single aim to reduce crime. I truly believe that a focus on targets distorts the system and leads to short term reactions on specific areas based on a necessity to keep the inspectorate happy. I am, therefore, pleased HMIC has found evidence that a target-based performance culture has lessened in Humberside Police. It is, as HMIC points out, vital that the integrity of the crime recording and disposal of crimes is victim-led in the first instance. This is the route we now clearly take, although there is much work still to do.

I am of course delighted that HMIC found no evidence of performance pressures leading to failures in crime recording, whether under-recording or misclassification of crimes. The significant take away is due to the percentage of crimes that the audit says were incorrectly recorded; the Force still has some work to do to get things right. However, it equally means that the mistakes are purely that, i.e. 'mistakes' or human error. It also means that the national concerns raised over the last several months by the Chief Inspector of Constabulary and the Home Affairs Select Committee about 'fiddling' the crime statistics are clearly unfounded in Humberside Police. There are undoubtedly some inaccuracies in the crime data locally, but as I believe it is merely human error and genuine mistakes, we can and will put it right. I intend to continue my work with the Chief Constable to ensure sound processes are in place, along with adequate training. We should ensure that supervisors are allowed to 'supervise', and messages about crime recording need to be constantly and consistently communicated across the whole organisation.

I welcome the seven recommendations specific to Humberside Police and will be working with the Chief Constable to look at the feasibility and cost of implementation. I am concerned that the majority of recommendations need to be implemented with immediate effect. I will work with the Chief Constable to focus our attention on three key areas in the first instance, namely:

- (1) Improved training around crime recording.
- (2) Ensuring that recommendations do not create unnecessary bureaucracy.
- (3) Providing both the time and opportunity for the Chief Constable to put in place what is operationally sound whilst better meeting the needs of victims of crime.

I will briefly mention one concern I have with one of the recommendations, as none of us wish to create unnecessary bureaucracy. Recommendation two mentions the need for the Force to develop a crime-recording policy according with the Home Office Counting Rules (HOCR) and National Crime Recording Standards (NCRS). The Force already, as HMIC states in their report, defers to the HOCR and NCRS. I am therefore quite concerned that the recommendation is merely asking the Force to create a policy whose only aim is to state that we should follow national guidance when this is clearly the case already. This is nonsense and creates unnecessary bureaucracy.

I remember the Crime Prevention Minister stating that it was vital recorded crime statistics remained as robust as they could possibly be. I fully share this view and I am pleased the results from the audit of the small sample of crimes carried out by HMIC paints a fair picture. However, on first reading of the report my first question was around why there was a difference between the local audit results I receive from the Force Crime and Incident Registrar compared to the findings of HMIC. The answer is three-fold:

- (1) Local audits focus on specific crime types and therefore the results can and do vary.
- (2) Local audits tend to have higher sample sizes than those undertaken by HMIC, therefore the 'failure' rate potentially makes a smaller difference to the percentage rate, i.e. a sample size of 10 with three failures means a 70% correct rate. If a further one 'failed', this would reduce to 60%. On the other hand, a sample size of 100 with 30 failures would be a 70% correct rate just the same, but one further failure would reduce the correct rate to 69%.
- (3) The timing of audits is also a factor in the results – this could be down to a range of issues including changes in staffing and/or supervision, training and re-audits.

All of these factors are within our control locally.

I am pleased that, despite the negative slant of the report (especially when compared to the initial positive feedback immediately following the audit), HMIC have highlighted a number of areas where the Force is progressing well. These will need to be flagged up to ensure good practice is retained and enhanced. This is particularly important given the changes being made in the Force at present. Some of the positive areas highlighted by HMIC include:

- Customer Service Crime Centre (CSCC).
- Force Crime and Incident Registrar Audit Unit.
- Dedicated Decision Makers (DDMs).
- Our work in piloting and integrating the new crime outcomes framework.
- No-criming of offences.

Just over 12 months ago I challenged the newly appointed Chief Constable to re-design the force with the overall objectives of modernisation, protecting the public and maintaining visibility whilst concurrently meeting the significant financial challenges. The Chief Constable carried out a significant and professional review, entitled 'Building the Future', which has thoroughly re-evaluated the way the Force operates. The plans for change are now in place and I am fully aware of the scale of the task in hand with the accompanying risks. However, the changes are essential if the force is to maintain its duty to the public and I intend to make sure it works. This is an area that I would welcome the professional expertise and advice of HMIC, as a body who should identify and export national best practice where locally practicable.

With a slightly wider perspective on recent and planned HMIC activity I have written to both Mr Tom Winsor and the now ex-HMI, Mr Roger Baker, detailing my concerns on the future direction of HMIC. There also now seems to be a national consensus that the HMIC inspection regime and intent raises some significant concerns and contradicts legislation and purpose.

The most significant issue is the national v local agenda. There are many other issues that I detailed to Mr Winsor and Mr Baker, however, the majority stem from this fundamental issue. With the inception of Police and Crime Commissioners and the issuing of subsequent Police and Crime Plans, local accountability and priorities were set. HMIC now appear to be attempting to contradict our Police and Crime Plans, which is absolutely unacceptable and at worse is dangerous and confusing to both the public and force.

I fully believe that we need to have an open and honest debate as to the future of policing and how both Police and Crime Commissioners and HMIC fit into a potential new model. If the aspiration from the centre is to have national standards across policing then let's discuss that issue. At the moment it feels like the concept of a national police force is being imposed stealthily with the thin veneer of local accountability masking the current of change.

Thank you for the opportunity to discuss the specific issue of the HMIC Crime Integrity Inspection whilst also highlighting some wider concerns on the direction of travel of HMIC and the national agenda.

Yours sincerely

A handwritten signature in black ink that reads "Matthew Grove". The signature is written in a cursive style with a large, sweeping initial 'M'.

Matthew Grove  
Police and Crime Commissioner

cc Tom Winsor, HM Chief Inspector of Constabulary  
Michael Cunningham, HM Inspector of Constabulary, Northern Region  
Justine Curran, Chief Constable, Humberside Police  
Nick Alston, Chairman, APCC