MOPAC MPS Oversight Board
12 March 2021

Information Governance
Report by: The Director of Data

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1. Purpose of this Paper

1.1. The purpose of this paper is to provide the annual update on information governance within the MPS.

2. Recommendations – that the Oversight Board:

a) For the Board to note the successes and challenges in Information Governance for 2020
b) For the Board to note the next steps and progress to be made in delivering our data ambition

3. Context

3.1. Significant work has taken place to develop and deliver our data ambition in the last 12 months. Data is increasingly a common part of our language and culture at all levels of the organisation. Acknowledgement of data as a valuable asset that enables policing activity has progressed beyond one of 'compliance'. Our five year plan to establish a Data Office and service-wide data vision is making great progress, one of the by-products of this is improvements in information governance.

4. Developments and Successes

4.1. Since last year's report to Oversight Board the MPS has established a Data Board and made significant headway in building its Data Office. We have also made forward progress across the wider organisation in our use of data analytics, whilst improving our service to the public on privacy rights. All of this has been possible because of the prioritised investment into the way we govern and manage our current data capabilities and the build of new ones; see **Appendix A** for a reminder of the Data Capabilities.

4.2. The Data Board, chaired by the Chief of Corporate Services, oversees the delivery of the Data Strategy and our progress towards the Met Direction ambition to become a data driven organisation. The Board reviews the implementation and maturity of data capabilities for the organisation, tracks performance, prioritises new opportunities for data development and manages data risks. It is currently serviced by three sub-groups; Data Quality, Reporting & Analytics, Review, Retention and Disposal with a fourth on Information Security & Assurance approved at the last Data Board.

4.3. The Data Office, which manages the strategic vision for data and analytics, continues to build. It enables the organisation to use its data in a lawful and ethical way. Since the last report a further 68 posts have been recruited across our Reporting & Analytics and Data Governance teams. We have also recruited a lead for our Data Academy and await the arrival of our Data Ethics lead too. This has increased our capacity to manage data, address legacy risks and stand up new capabilities and outputs. These include;

  4.3.1. Introducing new analytics services through a Data Science Apprenticeship and developing Risk Terrain Modelling[1].
  4.3.2. Increasing our Data Engineering capacity; this enables greater data sharing, technical support and more sophisticated reports, dashboards and analytics to be created
  4.3.3. Operating a performance framework that uses data and analysis to track progress, and drive decision making, consistently at each level of the organisation; connecting strategic decisions to operational delivery for Londoners
  4.3.4. Greater and more transparent reporting to the public about our use of data; especially privacy rights[2].
  4.3.5. Roll-out of data analysts across the BCUs to support operational colleagues & build consistency of reporting across the MPS
  4.3.6. Delivering daily analysis and reporting on the policing impact of COVID; our ability to operate, our enforcement of the law and our engagement with affected communities. For nearly a year, our work has been at the forefront of law enforcement delivery and was rapid in its set up and our agile approach has meant that we have adapted quickly, with our partners, to enable data-based decisions.
  4.3.7. Introducing processes to offer specialist advice and support to the development of Data Protection Impact Assessments, Data Sharing Agreements and other key legal artefacts that ensure good data governance. Whilst the volume here is challenging, the marshalling of organisational awareness to a) what is being processed and b) how it should be processed, is a real positive. 12 months ago we had a handful of such activity on our radar. Grip, confidence and oversight is significantly improved. Over 300 DPIAs have been reviewed, assessed and supported by the Data Protection Officer (an independent role). Complex and leading edge DPIAs for law enforcement developed in the last year include the use

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[1] A branch of geospatial analytics that diagnoses environmental conditions that lead to crime (and other problems). RTM analysis brings multiple sources of data together by connecting them to geographic places. It adds context to 'big data' and forecasts new risk patterns for locations
[2] FOIA (2000) and DPA (2018) timeliness

of Live Facial Recognition, live-streaming of body-worn video and AI (Natural Language Processing)

4.4. Through our Information Futures programme we have;

    4.4.1. Secured funding for an Evidential Data Archive solution to allow us to store compliant data and remove legacy systems before our integrated technical solution (Connect) goes live. This is being delivered on time and will enable £6M savings when the legacy systems for Connect are "turned off" (full "go-live" spring 2021).

    4.4.2. Rolled out self-service analytics to over 6,000 front-line staff (and growing) with our MetInsights tool. Allowing officers to build their own analytical searches to drive operations and activity now being delivered as BAU by the Data Office and Digital Policing

    4.4.3. Standing up an Information Asset Register and building an Information Asset Owners network (the latter still developing) allowing the MPS to know what data it collects, and about what, for the first time – now being delivered as BAU by the Data Office through a newly recruited Information Asset Registrar.

4.5. In partnership with Transformation Directorate, Digital Policing and Commercial Services we have integrated 'privacy by design' into the innovation pipeline and transformation delivery. This means we have coordinated information governance in place from concept, through procurement, contracting and execution for the first time. This was tested on two large pieces of work; a review of the risk to contracts when the EU-US Privacy Shield was removed (known as SHREMS2) and in our run-up to Brexit, where Data Adequacy and partnerships needed to be mapped and challenged on data processing security.

4.6. The MPS continues to test its ambition in the area of Analytics coupled with a strong desire to capitalise on that opportunity while maintaining and building public trust. Met Intelligence is working with Atos/Google on a pilot to identify linked series through investigation notes. We also continue to develop our Strategic Insight Unit; combining the experience of a renowned data scientist with academia and behavioural insight expertise to explore evidenced-based policing.

4.7. We have established a role as Data Leaders across law-enforcement and wider government. Spear-heading a cross-force team for the National Police Chief's Council who coordinated a successful submission to the Spending Review to build a National Data Office and Data Board for Policing. We hold a number of national portfolios in this area of expertise (Data Sharing, LFR) and attend Home Office Committees to shape the future of data, analytics and digital capabilities across policing; including SCIB[3], Crime Lab, Data Capabilities Centre and NDAS[4]. We are also key partners in cross-government Heads of Data Strategy group as well as a multi-agency Data Leaders Forum; both established to provide a professional voice to Data Leadership – and the coordinated development of data capabilities – across government.

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[3] Strategic Capabilities Investment Board
[4] National Data Analytics Service

4.8.   The release of the Government's National Data Strategy, NPCC's Digital Strategy, MPS Digital Enabling Framework and maturity of our organisational understanding of data opportunity and risk have all happily converged in 2020. This has led to a review of how we will drive data capability build over the next few years. A closure proposal for Information Futures Programme is almost near completion and plans aligning data work streams to the Data Strategy are also ready for submission – see an overview at **Appendix B**

5.   Governance and Privacy Rights

5.1.   After removal of the ICO Enforcement Notice in December 2019, the MPS has continued to improve and stabilise its management of Data Privacy Rights. We have focused considerable effort in this area as we know how critical it is to public trust; we must be able to service their right to access data about themselves and, more broadly, about the performance of our organisation. The recent ICO report (December 2020) of all forces on compliance showed that we have moved from enforcement to consistent delivery; a significant shift given our size and contribution to the privacy rights requests (we account for approximately 25% of all requests to law enforcement). We are proud of the monumental changes we have made in this space, in all aspects of our capacity, capability, process and technological improvements, improved training and awareness.

5.2.   Our current compliance reports – which have monthly public dashboards available on our website, another great step forward in our transparency here – show further improvements, despite some increases in demand over the last year.

    5.2.1. In 2020, we received 10,200 ROA requests (up from 7,700 in 2019). We have managed down the backlog of requests which led to the enforcement notice and now have a compliant turn-around time. On average we responded in a timely manner to 71% of ROA requests per month. In 2019 our monthly average was 40%. In February 2021, the public experienced a timely response in 76% of cases[5]

    5.2.2. In 2020, we received 4,200 FOIA requests (4,400 in 2019). Our response timeliness for FOIA also improved to a monthly average of 60% despatched on time, from 44% in 2019. In February 2021 the public experience a timely response in 68% of cases.

5.3.   We are pleased that our investment and commitment to public trust in the way we handle their privacy rights has shown dramatic improvement. Our aspiration of full compliance remains in place but will be a challenge in the current financial and operating environment without a disproportionate reinvestment of resources from other areas of the Met protecting the public. Nevertheless, we have plans in place to continue improvements in resourcing, technology and business processes.

5.4.   Data breaches are now managed and tracked centrally within the Data Office, overseen monthly by Data Board. Our analysis and insight of these breaches is more mature than a year ago and allows us to target prevention, awareness and

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[5] Latest performance data for month of February 2021

advice far more effectively. For example, we are able to understand if the breach is by an internal, external or 3rd party, the nature of the breach and the risk it poses. This led to a targeted awareness campaign across the MPS from May to July 2020. It has also led to our "Information & You" training being allocated "mandatory" status for all personnel (internal and external) with access to MPS systems.

5.5.   Our maturity in data governance and assurance has received a number of positive independent/external reports in the last 12 months. The two most prominent being the IPCO Review into Data Assurance and the ICOs report into all forces compliance with DPA (2018) and FOIA (2000) (available on the internet).

5.6.   The Commissioner and the Information Commissioner have regular meetings and our relationship remains strong with the regulator. In response to our request for greater clarity on data protection legislation applied to a law enforcement environment, we welcomed their development of toolkits on data sharing and data analytics in particular. We are embedding these into our own policy and guidance.

**6.   Challenges and Next Steps**

6.1.   Whilst the financial climate remained uncertain for much of 2020, our investment in some data capabilities were 'frozen'. This meant we focused on i) establishing good data governance, ii) serving the privacy rights agenda, iii) rationalising reporting and analytics outputs and iv) supporting data innovation in key operational areas.

6.2.   With greater financial certainty, we are pleased to have investment unlocked (£1.1M) to continue the build of the Data Office over the next twelve months. The focus for 21/22 will be i) working with more operational teams to drive value from data, ii) expansion of analytics and the profession of analysis & data science and iii) maturing critical data capabilities – Data Quality, Data Literacy, Data Sharing, Open Data (i.e. to the public).

6.3.   The pandemic, and consequential adjustments of working away from the Office, have not limited our delivery of information governance in the main. However, it did have an impact on our ability to collate physical records and respond in a timely manner to the public for privacy rights; albeit we have already seen that the performance is significantly improved.

6.4.   Our goal is to continue to improve in this space for 21/22. We are dedicating further senior oversight in a Deputy to the Data Protection Officer, applying triage (by complexity and risk) to submissions for DPIAs and Data Sharing Agreements and investing in new technology platforms that will aid our Information Asset Register management, data sharing and data artefacts. This will also mean we can give professional support to Information Asset Owners as the network is stood up in 2021. We have volunteered to an ICO Audit in autumn 2021 to review our compliance and delivery against DPA (2018); checking progress and being supported in areas that may need more focus.

6.5. Data Ethics has been an area impacted by the freeze in investment, but is now developing again at pace. This starts with recruiting a lead (due April 2021) who will establish links that were made in 2020 with NPCC UK Policing Ethics Governance Group, the London Ethics Network and RUSI. We have reviewed data ethics frameworks that can enshrine ethical considerations into an integrated impact assessment (encompassing DPIA and EIA); a first in policing being developed by DLS & Data Office that will mean operational staff can spend more time thinking through and articulating to the public 'what and why' rather than form filling.

6.6. We have found establishing timely Data Sharing Agreements across our partners a challenge. The latter half of 2020 has seen us align with MOPAC, the GLA and LOTI's Information Governance Leaders Forum to agree common sharing principles and an approach that we will build on to remove bureaucracy, improve training (data literacy) and drive an audit of User Access to MPS data so we have greater control on how data is accessed, for what and by whom.

6.7. Our considered development of data analytics capabilities has been hindered by delays in building the right environment within which we can operate data science techniques. We expect an interim solution for this to be in place in the spring of 2021. This will unlock wider roll-out of the successful Proof of Concepts we ran in 2019 that need technical architecture in place to support them; Intervention Analysis, Operational Horizon Scanning, Crime Spotter & Predictive Demand Forecast.

6.8. Business cases outlining the investment needed in our reporting and analytics platforms will be submitted in the coming year and we will be producing an AI Strategy to support the Advanced Analytics Strategy already managed by Data Board. We continue to engage in collaboration opportunities across law enforcement where value for public money in the delivery of analytics is clear.

6.9. Despite the progress made in Information Governance the MPS has been unable to tackle some aspects of our transformation due to the absence of key technical skills in a range of areas including Data Literacy, Data Quality, Data Standards and Master Data Management. 21/22 will see subject matter experts aligning with the MPS to help build capabilities in these areas to ensure we have the core foundations in place for good analytics and insight.

7. Conclusion

7.1. The MPS has made significant improvements in Information Governance over the last 12 months. Our focus on end to end build of data capabilities, alongside gripping our previous challenges in compliance means that we will be able to move our priorities for the next phase of work to enabling wider, better and more transparent use of data.

Appendix A – MPS Data Capabilities (MPS Data Strategy)
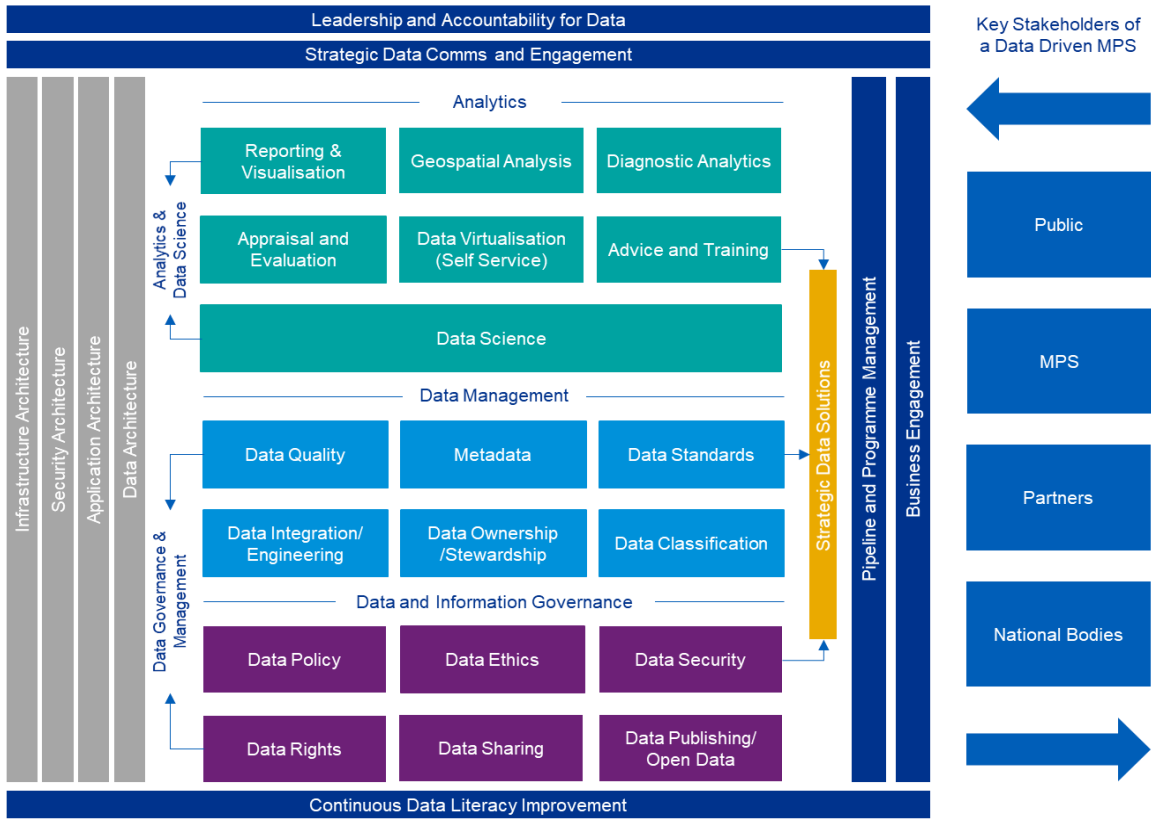
Appendix B – Data work streams for delivery in 2021/2022