

DMPC Decision – PCD 1305 - Project Peel Decision

Title: Project PEEL

Executive Summary:

In order to relentlessly deliver for London, the MPS is embarking on work to renew policing by consent by delivering more trust, less crime, and high standards. To do this, the Met needs an improved approach to how it understands and uses data, making use of new technologies and techniques.

Project Peel underpins efforts to relentlessly deliver for the public. It will enable the Met to become a data-driven, insight-based, and intelligence-led organisation. It will allow the Met to make better decisions by bringing precision to its community crime fighting and, by better use of data and the introduction of cutting-edge analysis, it will allow the Met to better focus its activity.

This project is critical to delivery of the over-arching ambition. Its goal is to set up a new capability – a coalition, representing colleagues from across the Met and private sector – which can take, analyse, and provide insight drawn from a range of data. This rich picture will influence its operational activity. Supporting this, Peel will deliver a new framework for measuring performance (focusing on the objectives of more trust, less crime, higher standards) and will identify new types of data which can inform further development.

Recommendation:

The Deputy Mayor for Policing and Crime is recommended to:

1. Approve the acceptance of donations from multiple suppliers detailed in this report up to a maximum of £3,835,000 towards building the capability of Project PEEL pursuant to section 93 of the Police Act 1996.
2. Delegate to Director Commercial Services the authority to approve additional s.93 agreements in relation to Project Peel up to the value of £500k, ensuring the new approvals and overall scope are subject to the same process and reported back to the Deputy Mayor for Policing and Crime.

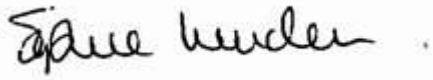
Deputy Mayor for Policing and Crime

I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct. Any such interests are recorded below.

The above request has my approval.

Signature

Date 24/10/2022

A handwritten signature in black ink, appearing to read "E. Hender", is written on a light blue rectangular background.

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC

1. Introduction and background

- 1.1. In order to relentlessly deliver for London, the MPS is embarking on work to renew policing by consent by delivering more trust, less crime, and high standards. To do this, the Met needs an improved approach to how it understands and uses data, making use of new technologies and techniques.
- 1.2. Project Peel underpins efforts to relentlessly deliver for the public. It will enable the Met to become a data-driven, insight-based, and intelligence-led organisation. It will allow the Met to make better decisions by bringing precision to its community crime fighting and, by better use of data and the introduction of cutting-edge analysis, it will allow the Met to better focus its activity.
- 1.3. This project is critical to delivery of the over-arching ambition. Its goal is to set up a new capability – a coalition, representing colleagues from across the Met and private sector – which can take, analyse, and provide insight drawn from a range of data. This rich picture will influence the Met's operational activity. Supporting this, Peel will deliver a new framework for measuring performance (focusing on the objectives of more trust, less crime, higher standards) and will identify new types of data which can inform further development.
- 1.4. Data science uses creative problem solving tools to business challenges, often uncovering transformative insight along the way. Data sciences can interrogate data sources and learn at a scale and pace previously impossible. Data science and the use of data is a very fast moving world and commercially extremely dynamic. Navigating the market place in a traditional route would fail to realise that this very new market needs very new ways of engagement to comprehend its potential and ways of working. Technological and learning advances are happening extremely quickly and the market is diversifying and growing at an incredible rate. This provides a huge opportunity for the public sector and for the Met.
- 1.5. The role of catching criminals is driven by information and having the ability to take advantage of this is paramount. Criminals are also savvy to this development in a data driven world, and they too are using algorithms, data science and information to stay ahead of law enforcement.
- 1.6. Evidence-led decision-making, when twinned with precise community-led target activity can have a significant impact on crime outcomes. While great strides have been made in enabling the Met to be better data-led and insight-managed there is more to be done.
- 1.7. In setting up Project Peel, the new Commissioner hopes to be able to take advantage of the benefits of a more evidence-led insight-driven approach to decision-making and delivery. The Commissioner also realises that the potential in the market is very broad and he wants the Met to understand the potential and take advantage of it, in a way that is safe and doesn't involve decisions that can take years to back out of.

- 1.8. By engaging a Taskforce of multiple providers, the Met hopes that they can help it identify and understand the opportunities where the Met can safely, but rapidly improve its data offer. The areas it is hoped the Taskforce can assist on are being packaged up across both build areas to help the Met understand what capability will be needed by the Met to deliver and areas focused on what capability it can start to produce to immediately help the Met be more insight-led from the off (proving the utility of a more enhanced approach to data analysis and insight).
- 1.9. Detailed in the list below, there are many areas that require consideration:
- system architecture and supporting technical tools and platforms
 - business process management
 - relationships and ways of working within a more data-enabled or science-led organisation
 - data-science techniques
 - data engineering and ways of working to make use of the data
 - data cleansing operational ability
 - building a new performance framework and helping the Met understand the relationship of its activity to outcomes
 - new performance dashboards
 - demand analysis and supporting evidence
 - operating model, relationships to existing met structures, roles, responsibilities, culture, ways of working, behaviours and communications
 - problem book with suite of use cases for data science exploration.
- 1.10. All the above areas are significant and could take many years to plan effectively using more traditional methodologies – by which time the Met would be very far behind the rest of the world. However, by operating in the way proposed in the paper, the Met can scan the market in the many niche areas described above (many suppliers operate in one area or a few areas of specialism) and begin to paint for the Met a complete picture of the capability and services it wants to provide.

Phase 1 – Pro-Bono

- 1.11. This phase is being led by Michelle Thorp – MPS Director Transformation and Aimee Reed – MPS Director Data with a cross functional team including Strategy and Governance, Digital Policing and Commercial Services.
- 1.12. The purpose of the first 100 days (Phase 1) is to scope the market, prove some use cases, and develop a longer term plan for developing a long-term, sustainable capability within the Met (people, process, systems, op model) for an insight-enabled future. It is likely that realising the potential will involve longer term investment and generation. One of the key deliverables is giving the Met a new set of tools for its toolkit.
- 1.13. Project Peel will give the Met a better real time environment for managing performance, with far better connection to the impact of decisions in real time and

shifts in trends and crime in London, also in real time. By offering insights in a room, the effect of evidence-based decision making using the same data at the same time can be extremely powerful as the service acts as a single source of the truth for the organisation's impact on performance, driving up outcomes for Londoners.

- 1.14. Having such a live operating environment, similar, but very different to the way that MetCC responds to individual incidents, will help the Met respond to trend changes in crime, respond better to community shifts in attitude and engagement, better understand what works across crime type and environment (e.g. in the public, private and online spheres), and manage its resources better.
- 1.15. By bringing in data science to this picture, the Met can also overlay what works by taking advantage of the most cutting edge ways to interrogate the big data sets that the Met owns (the Met has struggled with the scale aspect of its data and the Taskforce may be able to help the Met think about how to address).
- 1.16. Project Peel won't just impact on the Met. It is fully envisaged for some of the products to be designed for communities themselves, as well as working with partners like MOPAC.

Phase 2 – Post Pro-Bono

- 1.17. By the end of Phase 1 the Met would have worked with Taskforce members on a pro bono basis (the initial period is 6 months but engagements will be staggered through this process), which should have the following products:
 - an agreed operating model, with supporting infrastructure and design
 - proven use cases that can demonstrate the value of the approach
 - an understanding of a delivery road map and agile methodology for iterative capability improvements, building on what it was hoping to achieve during the first iterations
 - vision about additional capability that can be brought on board.
- 1.18. During this period the Met would have developed a business case defining the approach to build out more of the capability, develop the service offering to the Met and partners, and provide the right system, processes, infrastructure and tools to enable the full potential of the service to be realised. The business case will progress through normal governance for approval.

2. Issues for consideration

- 2.1. It should be recognised that engaging with industry is critical to help drive innovation and understanding of options for building upon the MPS's already established data capabilities. By engaging on a pro bono basis, the Met can secure value for Londoners by asking open questions and exploring the very best the market has to offer, unfettered by commercial considerations.

- 2.2. There are a number of risks the Met are managing, through the process. This paper covers a lot of the issues involved in managing the suppliers and their access to data, but it is also considering other interdependencies that may have an impact. Other dependencies include the availability of appropriate supporting systems and legacy incumbents. As these are part of the work the Taskforce is exploring the Met hopes to better articulate these through the process and into the business case.
- 2.3. Work is already under way to consider short term (Met Stats Stabilisation) and longer term strategic data warehousing capability within the Met and thinking is being linked into these teams, to ensure join up as thinking evolves.

3. Financial Comments

- 3.1. Details of the estimated value of individual sponsorship offers and a broad description are contained in section 2 of this report. The total estimated value of the sponsorship agreements for which approval is now sought is up to a maximum of £3.835m.
- 3.2. As this phase of the project evolves, additional capability gaps may evolve where the Met would like to engage with other suppliers or extend the offer of the current suppliers on a Pro-Bono basis. It is proposed that this approval is delegated to the Director of Commercial subject to Directorate of Legal Service (DLS) approving the s.93 agreement. If any of these offers should exceed £500k or be for a novel or contentious capability the Met would come back to MOPAC for additional approval.

4. Legal Comments

- 4.1. This proposal seeks approval for multiple offers of sponsorship under the provisions of s.93 of the Police Act. As long as the offers are assessed fairly and transparently then there is little risk of a legal challenge being made by way of judicial review.
- 4.2. There are reasonable objective grounds to approach known and/or incumbent suppliers for a short term project because they are more likely to have vetted staff and be able to contribute immediately. It would be important to consider offers from other suppliers and to respond with sound reasons for decisions to accept the offer or not.
- 4.3. Clause 4.8 of the MOPAC Scheme of Delegation requires the Deputy Mayor for Policing and Crime to approve all inward donations of £50k and above in value.
- 4.4. Each supplier arrangement will be formalised by an s.93 agreement. The s.93 agreement ensures any activity during this initial phase of Project Peel will not distort any procurement activity for future 3rd party commercial support.
- 4.5. In the event that future contracts are awarded to suppliers after Project Peel then they would need to be justified on an individual basis as normal. However, it would also be worthwhile to anticipate the likely objections of competitors who did not participate to help ensure both that the decision is objectively justified and that the rationale is adequate to help defend any legal challenges.
- 4.6. Publication of the agreement will be under the Elected Local Policing Bodies (Specified Information) Order 2011.

5. Commercial Issues

- 5.1. The selection of suppliers approached was based upon the fact that they are:
 - a. a current MPS supplier with relevant capabilities linked to Project Peel (Deloitte, Accenture, Microsoft, PWC, AWS, ATOS, Google, EY)
 - b. a recognised market expert in their field of expertise being explored by Project Peel (Naimuri, Agilisys, Kainos, Apple)
 - c. able to scale and operate quickly to meet the requirements of the project
- 5.2. A combination of reference points were used such as Gartner (and their suite of magic quadrants, example attached in Part 2 of the paper), to confirm compatibility against Project Peel requirements and their niche skill sets.
- 5.3. If other suppliers express an interest in participating on the taskforce, their capabilities would be assessed on a similar basis for potential inclusion.
- 5.4. A current MPS supplier was discounted due to current performance issues and this was explained to them and they agreed with the Met's position.
- 5.5. The estimated value of sponsorship offers and a broad description are contained in section 2 of this report.
- 5.6. For the purpose of the paper, where discussions are still being held with the supplier an estimated value of £500,000 each has been used. The final value will be clearly defined in the s.93 agreement and should this exceed £500,000 for any individual supplier the MPS will come back to MOPAC for prior approval.
- 5.7. Subject to the above point, the overall estimated value of the sponsorship is between £835k and £3,835k.
- 5.8. As this phase of the project evolves, additional capability gaps may evolve where the Met would like to engage with other suppliers or extend the offer of the current suppliers on a Pro-Bono basis. It is proposed that this approval is delegated to the Director of Commercial subject to Directorate of Legal Services (DLS) approving the s.93. Any such additional offers will be subject to the same process and be reported back to the DMPC. If any of these offers should exceed £500k or be for a novel or contentious capability the MPS would come back to MOPAC for additional approval.
- 5.9. All section 93 agreements signed will be reported through the current agreed mechanism, which is via the Investment Advisory and Monitoring (IAM) meetings, on the next commercial dashboard following signature of the S93 agreement.
- 5.10. During the initial phase of Project Peel Commercial Services will work with the project team to establish a commercial strategy in order that it can mobilise the third party

supply chain to support the longer term delivery of Project Peel. All future commercial arrangements will follow the appropriate governance for initiation and approval.

Supplier Management

- 5.11. The Taskforce is currently led by two experienced Directors, one who has a significant history of complex relationship management and experience of managing multiple suppliers on a single area of work. The approach below details the many steps taken to ensure all participants in the taskforce will be managed carefully.
- 5.12. Work packages will be agreed in depth, a single point of contact will be identified and work quality and learning applied.
- 5.13. During the course of the work, the approach will be monitored through the governance associated with the Commissioner's 100-day delivery plan as well as managed and led through the Enterprise-wide view of change as a significant project.
- 5.14. Each taskforce member will have a project lead who works with them to help them navigate the Met, stay true to their work package or use case and to manage outputs, and quality. They will be closely involved with commercial colleagues who will help track and manage any issues which could compromise the pro bono nature of the work or future equality.
- 5.15. As with all contracts, prior engagement of any nature, could provide participants an advantage. That being said, appropriate steps have been taken to protect any participant from an unfair advantage in any future engagement, including clear positions on IPR to protect future usage of products (e.g. software, tools and knowhow) developed as part of the PEEL project.
- 5.16. This includes, as part of the preparation for engagement with potential Taskforce participants, written material has been explicit that there is absolutely no guarantee or presumption of future work from the engagement.
- 5.17. It has also been made clear that any knowledge gained during the pro bono work can be shared as part of future commercial activity to ensure participants do not have an advantage in bidding for future work.
- 5.18. All participants have also been informed the pro-bono phase of the taskforce is for a defined maximum 6 months duration.
- 5.19. The suppliers providing pro-bono support have had their initial offer matched against the initial operating design and where required the Met has discussed and amended their solution to ensure maximum benefit from their offer is achieved.
- 5.20. Taskforce members will be brought onboard in a staggered way to manage their onboarding. Access to individual data sets will be strictly managed and all participants will go through the usual onboarding regimes to assess association with the Met (e.g. all participants will be asked to undertake Information and You training).

- 5.21. Steps have been taken, via the s.93 agreement, to ensure any participants are aware that information or learning gathered during any period of pro bono engagement can be required to be shared in the event of engagement in future procurement activity to retain equality.
- 5.22. As part of managing the suppliers, all MPS staff who are controlling the work packages will be asked to sign up to Government Commercial Function (GCF) Contract Management training. This course provides an understanding of all elements of the contract lifecycle, as outlined in the Contract Management Professional Standards. Achieving accreditation will provide recognition for their contract management expertise, as well as helping create a common contract management language.

Conflicts of Interest

- 5.23. As part of the process all persons who led the official engagement were asked to complete the Conflict of Interest form that is held by Commercial Services.
- 5.24. As part of the initial engagement the now Commissioner mentioned the aim of Project Peel to Deloitte (a current MPS supplier), however, all further engagement and the definition of their offering was led and managed by the Project Peel team.

6. GDPR and Data Privacy

- 6.1. The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.
- 6.2. Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects. In the case of the MPS, this means due consideration and protection to the processing of data under both Part 2 and Part 3 of the Data Protection Act (where Part 3 relates to the specific processing, and safeguards, required of a law enforcement competent authority).
- 6.3. The suppliers engaged in the sponsorship agreements for project will not be provided with personally identifiable data of members of the public, so there are no GDPR issues to be considered. The Met will, however, “on-board” those participants with clear expectations and training requirements that outline the rules governing the processing of data, the management of information in line with Met Sec Code.
- 6.4. However, as this is an agile project that will evolve to meet operational requirements the MPS Data Office will be monitoring this position, and should it change a DPIA will be completed, with mitigations assessed and where relevant the appropriate Data Processing Contract will be put in place before any data is provided.

7. Equality Comments

- 7.1. The activities of Project Peel is in support of usual policing activities and will adhere to national and MPS law enforcement policies and guidance that have been developed and as such the acceptance of the donation does not impact on staff or service users.
- 7.2. Project Peel has been cognisant of equality and diversity considerations as part of the mobilisation of the project itself. This has included ensuring our project space is accessible, all outputs are designed and presented in formats that are usable / readable to those with accessibility issues (e.g. visual impairments), and accounting for neuro-diversity. This is in line with existing work to implement a data and ethical assurance framework across the organisation to ensure that when we build / procure new capabilities they are 'compliant by design'.
- 7.3. The MPS Data Office will be monitoring all work products for this project to ensure that it takes into account protected characteristics in its analysis, conclusions and recommendations.

8. Background/supporting papers

- 8.1. Report

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOIA) and will be made available on the MOPAC website following approval.

If immediate publication risks compromising the implementation of the decision it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If yes, for what reason:

Until what date:

Part 2 Confidentiality: Only the facts or advice considered as likely to be exempt from disclosure under the FOIA should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a **Part 2** form – YES

ORIGINATING OFFICER DECLARATION

Tick to confirm statement (✓)

Financial Advice:

The Strategic Finance and Resource Management Team has been consulted on this proposal.

✓

Legal Advice:

The MPS legal team has been consulted on the proposal.

✓

Equalities Advice:

Equality and diversity issues are covered in the body of the report.

✓

Commercial Issues

The proposal is in keeping with the GLA Group Responsible Procurement Policy.

✓

GDPR/Data Privacy

- GDPR compliance issues are covered in the body of the report.
- A DPIA is not required.

✓

Drafting Officer

Craig James has drafted this report in accordance with MOPAC procedures.

✓

Director/Head of Service:

The Acting Chief Finance Officer has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.

✓

Chief Executive Officer

I have been consulted about the proposal and confirm that financial, legal and equalities advice has been taken into account in the preparation of this report. I am satisfied that this is an appropriate request to be submitted to the Deputy Mayor for Policing and Crime.

Signature



Date 19/10/2022