



Decision Paper:
Culture, Diversity & Inclusion Directorate Transformation Programme –
Resources to support core Management Activity

MOPAC Investment Advisory & Monitoring meeting - November 2023

Report by DAC Andy Valentine on behalf of the Chief People and Resources Officer

Part 1 – This section of the report will be published by MOPAC. It is classified as OFFICIAL – PUBLIC

EXECUTIVE SUMMARY

This paper seeks approval to go to market for a contract with a maximum value of £900k for support on delivering Culture, Diversity & Inclusion Professional Services to support a Baseline Audit of all on going CD&I initiatives across the Metropolitan Police Service (Met) and to activate the Standards and Values work-stream..

Recommendations

1. The Deputy Mayor for Policing and Crime, via the Investment Advisory and Monitoring meeting (IAM), is asked to:
 - A) **Approve the proposal to go to market for a contract to deliver the CD&I Professional Services of a value circa £900k; which will deliver: CD&I Baseline Audit (circa £300k), and Standards and Values Activation (circa £600k).**

Time sensitivity

2. A decision is required from the Deputy Mayor by 20th November 2023. Once agreed, the Metropolitan Police Service (Met) will commence the appropriate market scanning to deliver the Professional Services.

Non-confidential facts and advice to the Deputy Mayor for Policing and Crime

Introduction and background

3. The Met's remnant CD&I capabilities are not considered adequate to respond to the challenges identified by Baroness Casey and HMICFRS, or realise the Met's ambitions for reform. Consequently, the Met has committed to the formation of a CD&I Directorate of 53 posts.

4. In order to gauge the success of the CD&I Directorate it is critical to understand the foundation on which the Strategy is being developed. Hence, the Baseline Audit and Standards and Values Activation activity is essential and forms the CD&I Professional Services offering.
5. To understand what must change the Met has to gain an understanding of its current position therefore, it will be essential to understand the baseline to enable the Met to manage its success. Consequently, the CD&I Audit will be a tightly focused baseline audit of all existing activity within the Met to improve coherence and coordination. The identification of good practice with a view to upscaling is also a key imperative. This activity has been tried in the past under STRIDE however, much of the activity was under best endeavours lacking coordination and delivering inconclusive results.
6. Historically the Met has conducted discovery work that has identified a plethora of activity in the equality, diversity and inclusion (EDI) space which is commendable. Additionally, there have been studies (e.g. EY Culture Exploration Study in September 2022) to understand how to embed its values and principles within its staff something that the Met has struggled with '*aligning what it wants from people with how it articulates it*' and how to measure it.
7. The results of the previous studies will be considered in both the Baseline Audit and the Values and Principles Activation in negotiations with suppliers to ensure the experience of the previous studies can be referenced. However, how the CD&I Professional Services differs to previous studies will inform the overall CD&I Strategy, which will be owned by the newly formed Directorate.
8. To deliver the CD&I Professional Services external support is required from a single supplier to:
 - **Conduct the Baseline Audit.** The provision of experienced facilitators to conduct the audit across the Met, collate the results and suggest outcomes. Whilst the CD&I Directorate build up internal capacity and capability. The team will be independent and able to deliver impartial insight. Anticipated delivery is 3 months.
 - **The Value and Standards Activation.** The provision of experts to support the formulation and delivery of the Values and Standards Activation. Whilst the CD&I Directorate build up internal capacity and capability. Working closely with all stakeholders to ensure effective delivery of the Plan and the embedding of the Values & Standards across the Met. Anticipated delivery is 6 months.
9. The Met has to go to market to identify a supplier to work with the CD&I Directorate from February 2024 to July 2024. This will provide critical additional capacity and capability whilst it builds its internal infrastructure in order to reduce the need for external support post delivery from August 2024.

Issues for consideration

10. The CD&I Programme was formally launched on 21 August 2023.
11. All training will be underpinned by the Met's values and standards. Therefore, the Met must establish how this is facilitated effectively and ensure all training is consistent in approach.
12. The Met cannot wait for the new CD&I Directorate to deliver the Professional Services, which ideally should have been delivered ahead of the formation of the Directorate. Hence, the critical findings from the Professional Services will be incorporated into the iterative design of the Directorate.
13. The new CD&I Directorate will be mobilised at pace recognising the strategic imperative. Therefore, until the Directorate's Strategic Branch forms between November 2023 and the start of 2024, this procurement and delivery will be managed by the CD&I Programme Team. The Team's responsibilities will be as follows:
 - Overseeing the third party's delivery. This team will also ensure the Met is collecting appropriate data to measure benefits of this delivery. Third party delivery will be assessed on a weekly basis through participant evaluation so that any drops in quality or service can be promptly escalated. The team will meet weekly with the third party provider.
 - A dedicated Project Manager. This role holder will be responsible for ensuring an appropriate schedule for delivery activities and payments are made, ensuring early indication of schedule changes to avoid cancellation fees.
14. The CD&I Programme Manager will be responsible for overseeing supplier management and quality on a day to day basis, supported by a dedicated Superintendent.
15. Strategic oversight will be provided via the CD&I Programme (meeting with the supplier on a bi-weekly basis) and the Chief Officer Design Authority chaired by AC Gray (meeting monthly). This includes senior representatives from all Business Groups, along with the Federation.

Contributes to the MOPAC Police & Crime Plan 2022-25¹

16. Undertaking this work contributes to the area of the MOPAC Police & Crime Plan aimed at 'increasing trust and confidence', as it will provide a robust framework to deliver against the New Met for London's Plan to make culture change a priority for everyone, driven by senior leaders.

¹ [Police and crime plan: a safer city for all Londoners | London City Hall](#)

Financial, Commercial and Procurement Comments

17. The New Met for London Plan outlines three key priorities to reform; one of these is embedding the culture of policing by consent which is underpinned by the CD&I Programme and supported by the CD&I Directorate. Hence, the CD&I Professional Services will be funded from the New Met for London Plan.
18. There will be a requirement to secure external resource to deliver the CD&I Baseline Audit and complete the Standards and Values work. The current commercial frameworks will be used to evaluate suppliers for acceptable equality and diversity statements, as well as their ability to meet the Met requirements under the Equality Act 2010 as suppliers to MOPAC. The evaluation exercise will consider their ability to act as a responsible employer and meet employment obligations deemed commensurate with wider GLA objectives. There are no known negative equality or diversity implications arising from this process thus negating the requirement to present any mitigation.
19. In addition, it should be noted that the Met supports the Mayor's Responsible Procurement Policy including: Enhancing Social Value, Encouraging Equality and Diversity, Embedding fair employment practices, Enabling skills, training and employment opportunities, promoting ethical sourcing practices and improving environmental sustainability. The procurement will be done under the terms of the Crown Commercial Services (CCS) Management Consultancy Framework CCS framework agreements, the Met will take further steps to influence the behaviours of the preferred suppliers to achieve these aims if they are not already doing so. The new Directorate will adhere and take into consideration the Met Environment policy.
20. **London's Anchor Institutions' Charter.** This work contributes to the area of the London Anchor Institutions Charter which commits the Met to 'support our communities', as it will ensure that only those who can uphold the acceptable standards of professional behaviour are accepted into the Met, which will renew Londoners' trust in officers and staff.

Legal Comments

21. MOPAC is a contracting authority as defined in the Public Contracts Regulations 2015 ("the Regulations"). All awards of public contracts for goods and/or services valued at £213,477 or above shall be procured in accordance with the Regulations.
22. The MOPAC Scheme of Delegation and Consent provides the Deputy Mayor for Policing and Crime ("DMPC") has delegated authority to approve:
 - Business cases for revenue or capital expenditure of £500,000 and above (paragraph 4.8).

23. Paragraph 7.23 of the Scheme provides that the Director of Strategic Procurement has consent for the approval of the award of all contracts, with the exception of those called in through the agreed call in procedure. Paragraph 4.14 of the Scheme provides the DMPC reserves the right to call in any Met proposal to award a contract for £500,000 or above. This report requests approval by the DMPC for the Director of Strategic Procurement to approve the eventual award.
24. The route to market is clear and compliant, being based on using valid framework agreements. As such there are no legal issues with this proposal.

Equality Comments

25. As the intention of this document is to seek funding to deliver the resource required to deliver Professional Services reviews will be conducted throughout and if any new Equality Impact is identified, a full Equality Impact Assessment will be initiated.

Privacy Comments

26. The Met 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 Met to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.
27. 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.
28. The Information Assurance and Information Rights units within Met will be consulted at all stages to ensure the project meets its compliance requirements.
29. There are no apparent data protection issues at this early stage of the project. The project will ensure a privacy by design approach, which will allow the Met to find and fix problems at the early stages of any project, ensuring compliance with GDPR. DPIAs support the accountability principle, as they will ensure the Met complies with the requirements of GDPR and they demonstrate that appropriate measures have been taken to ensure compliance.
30. Whilst it is not expected to impact Data an initial DPIA will be raised on DAPIAN (535) and this will develop further once the delivery team is in place.

Real Estate Implications

31. The interim solution will not require any additional estate and will offer a blended method of working. Future estate requirements will be considered and bid for accordingly.

Environmental Implications

32. There are no environmental implications associated with this proposal.

Background/supporting papers

33. Supplementary context for the project has been included as an Appendix to the ExCo paper.

Part 2 – This section refers to the details of the Part 2 business case which is NOT SUITABLE for MOPAC Publication.

1. The Government Security Classification marking for Part 2 is:
 - OFFICIAL-SENSITIVE [COMMERCIAL]
2. Part 2 of the Decision Paper is exempt from publication for the following reason:
 - Exempt under Article 2(2)(a) of the Elected Local Policing Bodies (Specified Information) Order 2011 (Data Protection Section 43 – Commercial Interests).
3. The paper will cease to be exempt upon completion of the contract. This is because the information is commercially sensitive and could compromise future procurement activity.