

**DMPC Decision – PCD 1482**

**Title: Vetting Transformation project – Resources for planning and implementation**

**Executive Summary:**

This paper seeks approval for funding to contract a Supplier to plan and implement thorough transformation of the Referencing and Vetting function of the Metropolitan Police Service.

**Recommendation:**

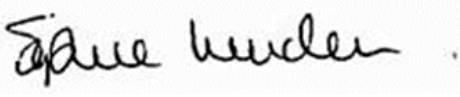
The Deputy Mayor for Policing and Crime is recommended to:

1. Approve £979k funding to fund the resource required to support the delivery of the Vetting Transformation Project over a term of 12 months.
2. Approve that Delegated authority to award the contract under the Framework, to the most commercially advantageous bid, is passed down to the Director of Commercial Services.
3. Seek retrospective approval to initiate the supplier competition to ensure the Vetting Transformation Delivery Team is in place by the 31 July 2023.

**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 27/07/2023



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

### 1. Introduction and background

- 1.1. To improve public confidence through improved accountability and transparency, body-worn video was introduced in the MPS in 2016.
- 1.2. Attempts have been made to transform Referencing and Vetting with internal resource since 2018. High profile cases of corrupt officers and independent reviews (namely Casey and that of the HMICFRS) have highlighted that vetting (including its processes and structure) must be wholly transformed. This is essential in order to restore public trust in the MPS, and to ensure that all police officers and staff who do not act in accordance with MPS professional standards are rooted out. Given this context, and the police uplift which has caused significant caseload backlogs, an Extra-Ordinary Performance Group was held on 17th May 2023, which approved the pursuit of resource to support the delivery of the Vetting Transformation Project.
- 1.3. A recent end-to-end review of referencing and vetting, which concluded in March 2023, highlighted inefficiencies and opportunities for automation within the process. The review team issued 12 recommendations resulting from their findings. These recommendations crystallised the actions which must be pursued in order to deliver a holistic approach to delivering an improved vetting function, and will ultimately set the direction of the project team. In addition, the team will refer to the Mets Principles and Values when implementing any change and consider how cultural issues can be highlighted. The 12 recommendations were as follows:

<b>R1</b> Consolidate all suggested changes to vetting (from R&V, external recommendations and this output) into a consolidated backlog and identify resource requirements	<b>R7</b> Increase resource and capacity to carry out DPS checks and investigate whether a handoff is required. Continue work to bring SB checks into the R&V teams
<b>R2</b> Create near real-time, holistic insights across the vetting processes to enable prioritisation and tracking of cases	<b>R8</b> Introduce a digital 'change in personal circumstances' form in combination with an annual mandatory declaration on personal circumstances
<b>R3</b> Increase capacity, skills, capability and culture of teams to champion change, increase agility and balance with operational delivery. Conduct a resource review to identify resource required for change portfolio	<b>R9</b> Carry out a robotics Proof of Value (PoV) to create a 'green-lane' check, initially in one key system (e.g. PNC or Centurion)
<b>R4</b> Take the learnings from Op Assure to create an ongoing vetting review BAU process. Across all processes, additional traits and indicators of vulnerability which might impact an individual's suitability to hold vetting should be built in over time	<b>R10</b> Clarify and strengthen the distinction between the scope of 'Vetting' and what is part of determining wider suitability (HR & Professional Standards) of a person for the MPS or a specific role, and communicate across the Met
<b>R5</b> Conclude CycVetting migration and rollout wider change management to realise its benefits (both in R&V and with wider stakeholders involved with vetting). Accelerate implementation of the next phase of functionality	<b>R11</b> Create a future-state user journey which will enhance the experiences of individuals interacting with vetting and is backed up by user feedback
<b>R6</b> Accelerate work to create automated PSOP/CycVetting and OLEEO/CycVetting linkages to enable consistent and near real time vetting status data across the organisation, aligned with HR data	<b>R12</b> Engage with other police forces and UKSV Vetting Transformation programme to share learning and continue to influence national police vetting policies (e.g. APP). Define and document local vetting policy including clarity on acceptable risk tolerances

- 1.4. Defined as 'Short Wave' activity, the MPS Referencing and Vetting function is currently aiming to achieve the Gold Strategy set on 2nd May 2023 in order to urgently address vetting backlogs and organisational risk following the completion of the Police Uplift Programme and the migration to a new online vetting portal. This will recover vetting performance, however it will not contribute to transformation of the function.
- 1.5. Without sufficient resource, meaningful transformation has not been realised to date and the current vetting function is straining to manage the influx of cases. Transformation is unable to provide the necessary resource to enable the required



change at the desired pace. Therefore, the Met must outsource support to accelerate vetting transformation, and ensure the change has certain durability and longevity.

## 2. Issues for consideration

- 2.1. The Vetting Transformation Project is expected to pursue a vetting function displaying the following hallmarks:
  - 2.1.1. Completely **digitalised**;
  - 2.1.2. Largely, if not entirely **automated**, potentially including decision making process;
  - 2.1.3. **Innovative** through the deployment of new and emerging technologies, such as AI and biometric and behavioural detection technologies (voice and facial recognition);
  - 2.1.4. **Collaborative**, particularly in the context of core infrastructure with connectivity to other forces and national security partners;
  - 2.1.5. **Highly efficient** - Issuing of low level clearances within hours;
  - 2.1.6. **Income generating** - MPS should emerge as a national vetting provider akin to the National Criminal Records Office, hosted by Hampshire Police, which provides criminal records certificates;
  - 2.1.7. Highly **cost effective** through a reduction in overall staff costs.
- 2.2. Professionalism has appointed a highly experienced lead to facilitate the necessary transformational change, who has been in post since 12th June 2023. Given the limited access to project support on arrival, the Project Executive must have a fully constituted team of suitably experienced and qualified personnel in place by 31st July 2023. This team will assess, plan and implement the 12 recommendations from the end-to end review in order to illicit the necessary change, and would be expected to deliver quick wins where possible e.g. Create dashboards to provide insights.
- 2.3. Engagement with experienced colleagues who have managed vetting transformation programmes indicated that the project would take 12 months to plan and implement, and require a blended team of five competent contracted individuals to enact the delivery. Throughout the activity the team plan to engage with external partners to ensure that the Met solutions align with broader national initiatives.

## 3. Financial Comments

- 3.1. The blended contracted team would be made up of the following:
  - a. A consultancy team to provide a formed resource who will know each other and have reach-back into a large firm with expertise in this type of delivery. Critically, the Delivery Lead must have specialist skills and experience, which is commensurate with the expected daily rate. The other team member rates are based on senior average rates available from Crown Commercial Services to ensure no further funding is requested. To be competed on Crown Commercial Services Management Consultancy Framework 3 (MCF3) LOT 3 and is estimated to cost c. £814k.



- b. An MPS support team made up from the Met's Business Partners, as they understand the business and have the necessary expertise to provide enabling activities across the project. This would ensure the Project team can readily replace skills by drawing on the Supplier resource pools. The Met has existing commercial frameworks to procure this resource, through competition which can be run to select the Supplier providing the best value for money. The Technical BA would be contracted through the existing DDaT framework, and the Comms Specialist through the Business Change framework. The cost for both of these is estimated at c. £165k based on an average rate, but will depend on which Supplier is selected. During procurement we will seek to reduce rates through competition and longevity of contract.
- 3.2. For IT solutions, additional funding will be required to deliver the solutions and support implementation. This activity would be managed via the Professionalism DDaT Business Engagement Manager and would be costed accordingly. The packages of solution designs are expected to encompass design work, infrastructure and security, and are estimated at circa £100k<sup>1</sup>. Funding will be requested separately for this following the assessment of requirements and it would be included in the solution delivery cost.
- 3.3. Furthermore, the delivery team proposal does not include Business Change; this will be provided by Transformation Business Change and the business group at various points over the 12 months. The established Professionalism Business Change Specialist and Change Manager will define the Business Change requirement and coordinate the activity throughout. Both will also assess the need for any Training Needs Analysis; however, Vetting has an established training academy that delivers against the training requirements. Therefore, support from Learning and Development should not be required.
- 3.4. Following consultation with Commercial, it was recommended that the competition was run in parallel with governance arrangements, and that the contractor was awarded under MCF3 as opposed to Bloom and Consultancy+ to avoid fees of up to 5%. The MCF3 route will deliver value for money, comply with competition rules and if run in parallel, it will deliver the necessary resource by 31st July 2023, enabling the transformational work to begin in a timely manner. The estimated costs are based on average rates via the MCF3 Framework, the competition is expected to provide reduced costs. An EOI has been sent to 30 suppliers to gauge interest, prior to tendering.
- 3.5. The Vetting Transformation Project will be broken down into 12 packages of work designed by the Supplier in collaboration with the Project Executive. These packages of work will be representative of the 12 recommendations. It is anticipated that approximately two thirds of the funding would be required in FY 23/24 (following contract award in July 2023), and the remaining third would be required in Q1/Q2 FY 24/25.
- 3.6. Funding for the Team will come from the Transformation budget as part of the New Met For London Plan.

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<sup>1</sup> Separate business cases will be developed once the technical solutions are fully scoped.



#### **4. Legal Comments**

- 4.1. 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.
- 4.2. 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).
- 4.3. 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 MPS 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.
- 4.4. 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.

#### **5. Commercial Issues**

- 5.1. The services will be procured via Management Consultancy Framework (MCF3) which is a compliant route to market and has been utilised by other police forces to contract for these services.

#### **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.
- 6.3. The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.
- 6.4. 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 MPS 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 MPS complies with the requirements of GDPR and they demonstrate that appropriate measures have been taken to ensure compliance.

- 6.5. As the intention of this document is to seek funding to deliver the resource required to deliver the Vetting Transformation Project, there is no impact on Data. However, an initial DPIA for the Project has been raised on DAPIAN (535) and this will develop further once the delivery team is in place.

## **7. Equality Comments**

- 7.1. MOPAC is required to comply with the public sector equality duty set out in section 149(1) of the Equality Act 2010. This requires MOPAC to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations by reference to people with protected characteristics. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 7.2. As the intention of this document is to seek funding to deliver the resource required to deliver the Vetting Transformation Project, there is no real organisational change. Further reviews will be conducted and if any new Equality Impact is identified, a full Equality Impact Assessment will be initiated.

## **8. Background/supporting papers**

- 8.1. Supplementary context for the project has been included as an Appendix to the PIB paper.

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

The Government Security Classification marking for Part 2 is:  
OFFICIAL-SENSITIVE [COMMERCIAL]

Part 2 of the BJP is exempt from publication for the following reasons:

- Exempt under Article 2(2)(a) of the Elected Local Policing Bodies (Specified Information) Order 2011 (Data Protection Section 43 – Commercial Interests).

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.



**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? YES/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	<i>Tick to confirm statement (✓)</i>
<b>Financial Advice:</b> The Strategic Finance and Resource Management Team has been consulted on this proposal.	✓
<b>Legal Advice:</b> The MPS legal team has been consulted on the proposal.	✓
<b>Equalities Advice:</b> Equality and diversity issues are covered in the body of the report.	✓
<b>Commercial Issues</b> Commercial issues are covered in the body of the report.	✓
<b>GDPR/Data Privacy</b> GDPR compliance issues are covered in the body of the report .	✓
<b>Drafting Officer</b> Alex Anderson has drafted this report in accordance with MOPAC procedures.	✓
<b>Director/Head of Service:</b> The interim MOPAC Chief Finance Officer and Director of Corporate Services 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**

*Manakucherd.*

**Date** 26/07/2023