



MOPAC

MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

Vetting Transformation

MOPAC Investment Advisory & Monitoring meeting 1 August 2024

Report by Hannah Jones on behalf of the Assistant Commissioner Professionalism

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

EXECUTIVE SUMMARY

1. This OBC details investment and decisions required to enable the design and delivery of long-term transformational change to the Met Vetting service, including investment in new enabling technology and delivery of a new operating model for vetting and integrity management. It sets out the internal and external drivers for change, most notably the New Met for London commitment to deliver wholesale transformation of vetting, the Baroness Casey Review, the Angiolini Inquiry findings (part 1) and the College of Policing Authorised Professional Practice.
2. Investment in the right technology and operating model over the coming months and years will both support the ongoing vetting recovery and create an agile function which is more immune to demand shocks experienced in recent years (and which are likely to continue for the foreseeable future).
3. Investment in the preferred option will drive tangible process improvements, enabling the release of between 22.9 and 37.7 FTE. We anticipate that any resource freed up by technology will be reinvested to provide the Met with the strongest possible Active Integrity Management programme. Appropriate business change activities will be put in place to manage the people impact. There are no anticipated impacts on existing plans regarding recruitment, however this will continue to be monitored as the Target Operating Model (TOM) design develops and, if potential impacts are identified, these will be flagged and managed through appropriate processes.
4. This paper sets out requests to initiate procurement and award for three specific services: two for software and one for delivery support. The individual value of each is in excess of £500k, and therefore requires agreement from Deputy Mayor for Policing and Crime.

Recommendations

The Deputy Mayor for Policing and Crime, via the Investment Advisory and Monitoring meeting (IAM), is asked to:

1. **Approve initiation of procurement action and award for a new Vetting Case Management Software as a Service (SaaS) solution.** Initial Project Revenue spend of circa £0.233m in 2024/25 and £0.778m in 2025/26.
2. **Initiation of procurement action and award for a contract for an upgraded automated Credit/Address Check SaaS solution.** Initial Project Revenue spend of circa £0.3m, with licence/hosting/support costs of £0.035m during 2024/25 (partial Yr1 costs for Q4), and ongoing varying revenue spend of up to £0.14m per annum from FY2025/26 – FY2028/29.
3. **Note use of Delivery Partner to supply Vetting Transformation project team to February / March 2026.**
4. **The release of additional NMfL funding of £2.306m in future years,** the NMfL schedule has been reprioritised and re-sequenced as approved at Management board to include funding for vetting.

The recommended option is 'transform (silver)', which will deliver the implementation of the Vetting TOM, continuous integrity checks, and the implementation of a new CMS and new credit checks solution. This option scored most favourably in the options appraisal and was deemed best placed to deliver crucial foundational elements against people, process, and technology to enable the Met to deliver vetting transformation as per the NMfL commitment.

Time sensitivity

A decision is required from the Deputy Mayor by 31 August 2024. This is because:

- The current Vetting Transformation project team contract expires on 13 September 2024 and we wish to limit the impact of a break in delivery;
- Delivery of a new CMS is likely to take up to 24 months, and we wish to avoid running into a 3rd year with our current case management system at a cost of c.£600k; and
- From 31 December 2024 the Met's current credit and address checking provision will become more expensive and replaced by "PAYG" option. Swift action in this area will reduce costs to the Met.

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

Introduction and background

1. Upon his appointment as Commissioner of the MPS in 2022, Sir Mark Rowley set out his case for reform of the service. The New Met for London (NMfL) plan sets out the Commissioner's mission to achieve **More Trust, Less Crime and High Standards**. Based on interactions with the public, the officers and staff who work for the MPS, and key partners across the city, the plan is empowered by the voices of people who want to see change in London's policing.

2. NMfL reflects the findings of the independent review carried out by Baroness Casey of Blackstock in 2022, with the plan highlighting specific areas of work relevant to the review findings. **In particular, the findings and recommendations include the need to radically reform the MPS vetting and misconduct processes.**

3. The transformation is highlighted as a priority commitment in the New Met for London plan:

“Transform and streamline vetting and misconduct processes and procedures, focusing on quality and timeliness (including internal and external dependencies).

Integrate key systems and processes (e.g., HR, vetting) to enable organisation wide connectivity and decision making.”

4. A wholesale transformation of vetting and misconduct is essential to aid in restoring public trust in the MPS, to ensure only the right people who are fit to work for the service are recruited, and that all police officers and staff who do not act in accordance with MPS professional standards are removed from the organisation.

5. From this foundation, the MPS has further long term ambitions to develop the capacity, capability, and credibility to be in a position to offer national vetting services to other UK forces and law enforcement agencies. In time this could become an income generation stream for the Met once the internal service has been developed and stabilised sufficiently.

Issues for consideration

6. Over the last 12 months the Vetting Transformation Project has worked through the recommendations from the 2023 End-to-end Vetting Review. In doing so, the project has formed a sound understanding of the further steps required to transform the function.

7. The recommended option set out in the attached OBC is not the most transformational that was considered, but it is the highest scoring option in the options appraisal looking through the monetary, non-monetary and risk lenses. Elements descoped in the recommended option reflect the acute financial circumstances of the MPS. Crucially, everything that will be implemented through this OBC will ensure the function is in a strong position to achieve full transformation in future.

8. The transformation set out in the OBC, and the target operating model being designed for vetting, complement the work of the wider Professionalism programme which will see DPS and Vetting teams merge to introduce a public-health approach to Integrity Management within the MPS. Our two key shifts – efficiency through digitisation and a culture of continuous assurance – are aligned with those of the wider programme.

9. Whilst we are seeking financial investment from the New Met for London funding for the first two years of this transformation, we expect that the ongoing running costs of the new systems will be funded from within existing budgets. As we consider further automation of vetting processes we expect to release FTE to build our Active Integrity Management function.

10. Further detail on all of the above is contained in the restricted section of the report.

Contributes to the MOPAC Police & Crime Plan 2022-25¹

11. The Vetting and Professionalism Transformation Programme directly contributes to the MOPAC Police & Crime plan priority: Increasing Trust & Confidence. Specifically, the transformation will ensure that only those who meet the high professional standards expected of the MPS will be able to join the service. It will also improve our effectiveness at managing those at risk of falling short of our standards and driving out those who do.

Financial, Commercial and Procurement Comments

12. The funding required for this OBC comprises business as usual costs and New Met for London Investment The NMFL investment has been agreed through Transformation Group (28 May 2024), Management Board prioritisation (17 July 2024) and has been noted by ExCo on 23 July 2024.

13. Planned spend will be split between Project Revenue Costs from NMFL and business as usual costs There are projected savings in years 3-5 of the project.

14. This paper recommends the initiation of procurement and delegation of authority to the Commercial Director to award the following contracts:

- the direct award of a contract for a new Case Management System and Connection to the MPS Integration Layer to Softcat Ltd, a value-added reseller via the EEM Framework, with WPC Software as a subcontractor for a term of 5 years (an initial period of 4 years with one optional period of extension of 12 months).
- a contract for an upgraded Credit Check solution, for a term of 5 years (an initial period of 4 years with one optional period of extension of 12 months, via a mini-competition from the HTE Framework).
- The delivery team will be sourced from the Met's Transformation Delivery Partner, only in the unlikely event that they cannot provide all required roles for delivery - a contract for the specialist resources required through a mini-competition using a standard commercial framework for a maximum term of 15 months.

15. MOPAC and the MPS are required to comply with the public sector equality duty set out in section 149(1) of the Equality Act 2010. The decisions above will include an assessment of the supplier's ability to meet the MPS requirements under the Equality Act 2010 and an assessment of acceptable equality and diversity statements. There are no known negative equality or diversity implications arising from this process.

16. Further information is contained in the restricted section of the report.

Legal Comments

17. The Mayor's Office for Policing and Crime 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 (inclusive of VAT) or

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

above will be procured in accordance with the Regulations.

18. Paragraph 4.13 of the MOPAC Scheme of Delegation and Consent provides the Deputy Mayor for Policing and Crime delegated authority to approve all requests to go out to tender for contracts valued at £500,000 or above.

19. All proposed procurement routes are via established framework agreements and compliant with the Public Contract Regulations 2015.

20. Further information is contained in the restricted section of the report.

Equality Comments

21. Equality Impact Assessments will be completed for all new software and automations as part of the procurement and implementation phases of this project. In relation to the Credit and Address check software, the ITT process will assess the tools and techniques used by vendors and rigorous testing of the outputs.

22. During the tender process, we will aim to select a software solution that supports and is compatible with the Web Content Accessibility Guidelines (WCAG 2.1 or above).

Privacy Comments

23. 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 to safeguard the rights and freedoms of individuals.

24. 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 likely to result in a high risk to the rights of the data subjects.

25. The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.

26. A DPIA has been completed for the Vetting function and will be updated for each new software procured. 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.

27. Data handling has been confirmed as OFFICIAL – SENSITIVE, and the new solutions will also only be made accessible via Foundation devices and not personal devices.

28. As is standard, a requirement for an IT Health Check has been identified due to the type of activity being undertaken. This will provide assurance that any supplier selected will conform to the Met's cyber security standards.

Real Estate Implications

29. This project primarily relates to purchasing a Software as a Service software solution, which will be used by existing staff to support existing processes, and therefore should not have any real estate implications for the Met. Changes to the target operating model with Vetting and Professionalism effected as a result of the wider transformation problem will be address through a separate OBC, where estates implications will be examined in the round.

Environmental Implications

30. There are no additional environmental implications from the proposed project. It is generally recognised that implementing cloud-based solutions contribute to reducing the Met's Carbon Footprint, because servers are fully optimised as they are not simply allocated to single requirements. Therefore, supporting the MPS environmental responsibilities as a London Anchor Institution.

Background/supporting papers

31. MPS OBC – Vetting Transformation FINAL July

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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 Vetting Transformation OBC 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 relevant sections under the FOIA that would exempt this information from disclosure:
 - Commercial Interest Section 43
 - Legal Professional Privilege Section 42

The paper will cease to be exempt until after completion of the associated contract. Any request for information under FoIA would need to be assessed on a case by case basis, no matter what or when the original decision was made, as the circumstances may have changed e.g. information no longer commercially sensitive.