

REQUEST FOR DMPC DECISION – PCD 380

Title: Replacement of MetRIC system for Freedom of Information Act (FOIA)/Subject Access Request (SAR)/Data Protection Act (DPA)/ Environmental Information Regulations (EIR), and Correspondence/Case Management

Executive Summary:

The current Metropolitan Police Service solution for dealing with information requests from the public and correspondence is beyond end of life and no longer meets the business need. There is a need to procure an up to date and reliable solution that has the potential to be extended to further areas of the Metropolitan Police Service to modernise their working practices.

Recommendation:

The Deputy Mayor for Policing and Crime is recommended to:

1. Approve the procurement of a commercial off the shelf product, GSA Ltd.'s CycFreedom, on a Software as a Service basis to replace the obsolete MetRIC system.
2. Approve the Capital and Revenue expenditure within the funding options.

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*Sybil Henderson***Date***23/04/18*

PART 1 - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC

Decision required – supporting report

1. Introduction and background

- 1.1. As a Data Controller and Public Authority, the Metropolitan Police Service has a legal obligation to respond to requests from individuals made under the Data Protection Act (DPA), the Freedom of Information Act (FOIA) and the Environmental Impact Regulations (EIR) in a timely and accurate fashion.
- 1.2. This process is currently managed using the MetRIC system, which is now beyond end of life and is supported on a “best endeavours” basis only. It is slow and unreliable, with limitations to its functionality that affect its ability to remain compliant with changing legislation and the ability of the Metropolitan Police Service to respond to requests within the required response time.

2. Issues for consideration

- 2.1. The principal risk to the Metropolitan Police Service is that the MetRIC system suffers a partial or total loss of service for an extended time period, or that there is a complete and unrecoverable service failure. Such a failure would cause the Metropolitan Police Service serious difficulty in complying with its obligations under legislation.
- 2.2. The suggested solution has potential for reuse in other areas of the Metropolitan Police Service who are currently heavily reliant on paper based processes.

3. Financial Comments

- 3.1. The Capital and Revenue expenditure and funding options are detailed in Part 2.

4. Legal Comments

- 4.1. The Mayor’s Office for Policing and Crime (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 £181,302 or above must be procured in accordance with the Regulations. There are no significant legal issues arising because of the replacement of MetRIC.

5. Equality Comments

- 5.1. The nine Protected Characteristics specified by the Equality Act 2010 have been considered and the only one to be engaged by the replacement of MetRIC is disability. The product chosen is compatible with assistive technology and this will be tested against that used in the MPS as part of the acceptance process.

6. Background/supporting papers

- 6.1. 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

It is recommended that the information in the Part 2 form not be published since if a request for this information was made under the FOIA, it is likely that it would be exempt from disclosure under the following sections for the FOIA:

Section 43 Commercial Interest

Date at which Part 2 will cease to be confidential or when confidentiality should be reviewed: at the completion of the contract.

ORIGINATING OFFICER DECLARATION

	<i>Tick to confirm statement (✓)</i>
Head of Unit: The Chief Finance Officer has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.	✓
Legal Advice: Legal advice is not required.	✓
Financial Advice: The Strategic Finance and Resource Management Team has been consulted on this proposal.	✓
Equalities Advice: Equality and diversity issues are covered in the body of the report.	✓

OFFICER APPROVAL**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

R. Lawrence

Date

19/4/18

**MOPAC**MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME**Replacement of MetRIC system for FOIA/SAR/DPA/EIR, and
Correspondence/case Management****MOPAC Investment Advisory Board 26th April 2018****Report by Angus McCallum on behalf of the Deputy Commissioner****Part 1 – This section of the report will be published by MOPAC. It is
classified as OFFICIAL – PUBLIC****EXECUTIVE SUMMARY**

The current MPS solution for dealing with information requests from the public and correspondence is beyond end of life and no longer meets the business need. There is a need to procure an up to date and reliable solution that has the potential to be extended to further areas of the MPS to modernise their working practices.

In line with the ONE MET Digital Poling Strategy 2017- 2020, and adopting a 'cloud first' principle making use of public cloud offerings whenever possible, a suitable solution has been identified for procurement via the G Cloud 9 route. Approval is sought from the Deputy Mayor and IAB to procure CycFreedom, which is currently in use at 20 other police forces in England and Wales.

Recommendations

The Deputy Mayor for Policing and Crime, via the Investment Advisory Board (IAB), is asked to:

1. Approve the procurement of a commercial off the shelf product, GSA Ltd.'s CycFreedom, on a Software as a Service basis to replace the obsolete MetRIC system.
2. Approve the Capital and Revenue expenditure within the funding options.

Full details of the approvals sought are contained in the restricted section of the report.

Time sensitivity

A decision is required from the Deputy Mayor by 7th May 2018. The current MetRIC 3rd Party support contract runs until 31st August 2018, however it is due for renewal by end of May 2018. The General Data Protection Regulation comes into force on 25th May 2018, and a new solution is required to ensure MPS compliance with its provisions.

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

Introduction and background

1. As a Data Controller and Public Authority, the MPS has a legal obligation to respond to requests from individuals made under the Data Protection Act (DPA), the Freedom of Information Act (FOIA) and the Environmental Impact Regulations (EIR) in a timely and accurate fashion. In 2016, the MPS received just under 6000 such cases.
2. This process is currently managed using the MetRIC system, which is now beyond end of life and is supported on a "best endeavours" basis only. It is slow and unreliable, with limitations to its functionality that affect its ability to remain compliant with changing legislation and the ability of the MPS to respond to requests within the required response time.
3. The MetRIC system was also designed to record and manage incoming correspondence to the MPS. The limitations of the system are such that local correspondence is now being managed on a labour intensive spreadsheet system. It is still being used by the External Relations Team who manage correspondence for the Commissioner's Private Office, but its unreliability and slowness cause operational inefficiency.
4. The MPS has a business need for an up to date and reliable solution to manage DPA, FOIA and EIR requests together with correspondence. There are also units with heavily paper based processes, such as the Misconduct Hearings Unit in the Directorate of Professional Standards who would benefit from an online request handling and redaction product.

Issues for consideration

5. The principal risk to the MPS is that the MetRIC system suffers a partial or total loss of service for an extended time period, or that there is a complete and unrecoverable service failure. Such a failure would cause the MPS serious difficulty in complying with its obligations under legislation.
6. The replacement of MetRIC will produce Quantitative Cashable and Non-Cashable benefits as well as Qualitative benefits.
7. The suggested solution has potential for reuse in other areas of the MPS who are currently heavily reliant on paper based processes.
8. Further detail is contained in the restricted section of the report.

Contributes to the MOPAC Police & Crime Plan 2017-2021

9. The replacement of MetRIC by a modern and flexible information management application directly supports the Mayor's commitment to providing the digital equipment that will enable staff to operate more efficiently and effectively.

Financial, Commercial and Procurement Comments

10. The procurement route for the replacement is via the Government G Cloud 9 Framework. Further details are contained in the restricted section of the report.

Legal Comments

11. The Mayor's Office for Policing and Crime (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 £181,302 or above must be procured in accordance with the Regulations. There are no significant legal issues arising because of the replacement of MetRIC.

Equality Comments

12. The nine Protected Characteristics specified by the Equality Act 2010 have been considered and the only one to be engaged by the replacement of MetRIC is disability. The product chosen is compatible with assistive technology and this will be tested against that used in the MPS as part of the acceptance process.

Privacy Comments

13. There are no privacy issues arising as a result of the replacement of MetRIC, and the new system will be fully compliant with the provisions of the General Data Protection Regulation (GDPR).

Real Estate Implications

14. There are no implications for the MPS physical estate or Estate Strategy.

Environmental Implications

15. There is no impact on the Mayor's London Environment Strategy.

Background/supporting papers

16. None.

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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- [COMMERCIAL]

Part 2 of Replacement of MetRIC system for FOIA/SAR/DPA/EIR, and Correspondence/Case Management 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 Act Section 43 Commercial Interest.

The paper will cease to be exempt at the completion of the contract.

