

MOPACMAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL 3 October 2022

Update on the Met's work to Rebuild Trust and the Met's engagement with the HMICFRS Engage process

Report by: A/Chief of Corporate Services Roisha Hughes

Report Summary

Overall Summary of the Purpose of the Report

This report seeks to provide the Audit Panel with an update on the Met's continued work to rebuild trust and the Met's engagement with the His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) Engage process.

In addition to the activity outlined below, the Met's efforts to build trust and confidence and respond to HMICFRS Engage phase are further supported by the new Commissioner's plans including his focused activity across his first few months. The aim will be to bring ongoing work aimed at building trust and confidence together into one strategy and corporate plan towards the end of the year to ensure a joined up and aligned approach.

Key Considerations for the Panel

N/A

Interdependencies/Cross Cutting Issues

Work is ongoing in support of the Met's strategy for inclusion, diversity and engagement. Our work to deliver on our STRIDE commitments is a key pillar of our work to build trust and confidence.

Recommendations

The Audit Panel is recommended to:

- a. Note the Met's progress in response to the HMICFRS Engage Phase
- b. Note the Met's progress as part of Rebuilding Trust programme.

Supporting Information

HMICFRS Engage:

1. The MPS was moved to 'Engage' (formal monitoring) by HMICFRS in June 2022, due to a number of issues identified by a series of inspections of areas including performance, counter corruption, culture and incidents impacting reputation / trust. The HMICFRS letter to the Met is included as appendix 1.
2. Seventeen HMICFRS inspections have taken place across Met since September 2020. Most significant for the Engage process are the following:
 - 2.1. The 2021/22 PEEL (Police Effectiveness Efficiency and Legitimacy) assessment, which at the time of writing this report is being finalised by HMICFRS and released for publication, indicates that there are a number of systemic issues, areas for improvement and within the MPS' Command & Control functions, there is a 'Cause of Concern' linked to call handling, which is also graded as inadequate.
 - 2.2. An inspection of the MPS's counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel (March 2022), resulted in five Causes of Concern, 20 recommendations and 2 areas for improvement. The Causes of Concern are:
 - 2.2.1. Management of exhibits and other property
 - 2.2.2. Lack of any concerted effort to establish relationships between DPS and organisations supporting vulnerable people.
 - 2.2.3. Lack of proactive work to gather counter-corruption intelligence.
 - 2.2.4. Lack of monitoring and oversight of declarable associations, business interests and gifts and hospitality.
 - 2.2.5. The current professional standards operating model within the MPS.
 - 2.3. Two Causes of Concern from the 2018/19 PEEL inspection are not yet resolved to HMICFRS's satisfaction:
 - 2.3.1. The MPS is failing to effectively manage the risk posed by medium and low-risk registered sex offenders in line with approved practice
 - 2.3.2. The size of the vetting backlog. (We anticipate that this will be closed by HMICFRS soon)
3. HMICFRS also cited a number of high-profile incidents that further raised their concerns about the MPS.
4. On the other hand, HMICFRS have also commented that the MPS is not a 'failing force' and that there are many areas of very good practice and demonstrations of policing with pride, professionalism and integrity.
5. 61 recommendations have been implemented and are awaiting review and sign off as complete by HMICFRS. A further 62 recommendations are being actively progressed by the MPS.

HMICFRS Engage - MPS Improvement Plan - approach to date and strategy

6. The A/Commissioner, Sir Stephen House, met HM Chief Inspector of Constabulary at the Police Performance Oversight Group (PPOG) on 14 July, setting out the MPS's acceptance of the recommendations and findings and our determination to address their concerns and improve our service delivery.
7. Initially led by the then A/Deputy Commissioner, Helen Ball, the Met's response to addressing Engage now sits within the work of the new Commissioner's reform plans, which are being set in place and communicated through a comprehensive 100-day plan. This work is being led by Assistant Commissioner Louisa Rolfe. The MPS is confident that the 100-day plan's key activities and organisational changes will address Engage concerns.
8. Detective Chief Superintendent Marcus Barnett has been appointed to co-ordinate the work of Engage for the MPS. He will work within the 100-day plan activity, as well as with Strategy & Governance and HMICFRS to ensure a timely and robust response continues to be delivered by the MPS. The MPS will continue to focus on addressing Engage through a co-ordinated and committed work programme with MOPAC and HMICFRS oversight.
9. The publication date of the final PEEL 21/22 report was been postponed from the 16 September. This due to the death of her Majesty the Queen. The Commissioner, was also to present MPS' plans for addressing 'engage' matters raised at HMICFRS PPOG on 19 September. This date has been cancelled (to be rescheduled) due to the state funeral of Her Majesty the Queen. MPS PPOG attendance, will include identifying ways in which PPOG members can assist the MPS.

Rebuilding Trust

10. At the March Audit Panel, the Met updated on our continued work to build trust and confidence. This update included an update on how the Met's three core action plans Rebuilding Trust, STRIDE and VAWG are governed and anchored within Met Direction.
11. In this paper we provide an update the Rebuilding Trust programme of work. Audit Panel are also receiving a separate update on STRIDE. The three action plans continue to report jointly to the Met's performance board.
12. Audit Panel will be aware that last October the Met launched 12 immediate priorities to rebuild trust. This aligned with the announcement of an independent review of the Met's culture and professional standards led by Baroness Casey. Our work to rebuild trust has evolved over the last 12 months which has included committing to a further 8 priorities in December 2021 and a range of further commitments in February.

13. A small central team was created under a dedicated Commander to drive forward this work across the Met. The majority of the RBT programme of work is delivered within business as usual activity with the RBT team acting to co-ordinate and join up related projects to maximise impact.
14. Over the past 12 months RBT have worked with business areas to formally close completed priorities and update to the previous Rebuilding Trust Management Board and RBT GRIP both of which were chaired by the Commissioner.
15. As part of this process the RBT have formally closed a number of priorities with all activity complete, closed and returned a number to business as usual governance, and been asked to continue providing oversight of others while further work is undertaken.
16. An update on the progress of each of the 20 priorities is provided in Appendix 2
17. In addition, the Rebuilding Trust team have led the rollout of Command Assessment of Standards across all the Met's B/OCUs. The Assessment requires our senior leaders to self-assess their command in relation to five initial areas; Management of Long Term sickness, Personal Issue Police Equipment, Declarable Associations, Gifts and Hospitality and Business Interests. We are currently analysing the results of these assessments to drive improvement and share good practice. An interim updated will be provided to the next Trust, Inclusion and Diversity Board. To support this processes we invited DARA to support the analysis and are grateful for their continued support as well as their consideration how this format may be applied across the Met in the future.
18. The Rebuilding Trust team is also leading and coordinating the implementation of a proof of concept of new rapid community polling tool provided by ZenCity. This three-month proof of concept will seek to understand how such a tool can be used by the Met to understand community trust and confidence and support the Met to responded in nearer real time. We see the use this platform as complimentary to MOPAC's Public Attitude Survey and are seeking to work closely with MOPAC during the proof of concept.

Rebuilding Trust – Baroness Casey Review

19. Audit Panel will be aware that Baroness Casey's independent review of the Met's culture and standards commenced in February 2022. The review has engaged extensively across the MPS with officers and staff at all levels, visiting a large number of BCUs and other OCUs.
20. The Review team has also consulted with Staff Support Associations, the Federation and the Superintendents' Association among others to gauge views and understand the internal challenges.
21. Having been initiated by the previous Commissioner, Dame Cressida Dick, the review continues to have the full support of the new Commissioner.

22. We currently expect the review to conclude its work within the nine to twelve months period set out in the terms of reference¹.

Rebuilding Trust – Angiolini Inquiry

23. Audit Panel will also be aware that Lady Elish Angiolini was appointed to lead a two-part inquiry. With part one aiming to ‘address the issues raised by the abduction, rape and murder of Sarah Everard by an off-duty Metropolitan police officer.’

24. Lady Elish was appointed following consultation with the family of Sarah Everard, who are being kept updated by the Inquiry. The terms of reference for Part 1 of the Inquiry were published in January 2022. On 31 January 2022 the Angiolini Inquiry formally began their work. The Met continues to support the inquiry as it continues its work.

25. In July 2022 the Home Secretary agreed with Lady Elish that conclusions of Part 1 of the Inquiry would be delayed due to ongoing criminal process and that Part 2 should be brought forward². We currently expect that consultation on Part 2 may begin in the Autumn.

26. Equality and Diversity Impact
N/A

27. Financial Implications
N/A

28. Legal Implications
N/A

29. Risk Implications
N/A

30. Contact Details
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31. Appendices and Background Papers

Appendix 1 – HMICFRS Engage Letter to the Met

Appendix 2 - Rebuilding Trust - Update on progress (September 2022)

¹ Available online at: www.met.police.uk/SysSiteAssets/media/downloads/met/about-us/baroness-casey-review--terms-of-reference.pdf

² Available online at: <https://www.gov.uk/government/publications/angiolini-inquiry-part-1-terms-of-reference>



Promoting improvements
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Matt Parr CB
Her Majesty's Inspector of Constabulary

By email

Sir Stephen House QPM
Acting Commissioner
Metropolitan Police

28 June 2022

Dear Sir Stephen

HMICFRS MONITORING GROUP DECISION TO PLACE THE MPS IN 'ENGAGE'

I write further to our meeting on Friday 24 June 2022. As you will be aware, in order properly to inform our decisions about what inspections are necessary, and to ensure we maintain a sound view of the performance of forces, we operate a continuous monitoring process. We apply it to all forces. A detailed description of the process can be found in paragraphs 62 to 134 of our published document *Inspection of the performance of Home Office police forces*, available here:

[Inspection-of-the-performance-of-Home-Office-police-forces.pdf \(justiceinspectors.gov.uk\)](https://www.justiceinspectors.gov.uk/Inspection-of-the-performance-of-Home-Office-police-forces.pdf)

2. As you know, we have decided to move the MPS into the 'Engage' phase. Accordingly, I'm writing to set out the rationale for our decision, and to explain what happens next.

Rationale

3. For a considerable time, we have had substantial and persistent concerns about several aspects of the MPS' performance. Ample explanations of these appear in various inspection reports.

4. A notable example, from March 2022, is our inspection of the MPS' counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel. In this report, we described a range of systemic failures. These systemic failures were not just in relation to counter-corruption related specialist matters but more generalist matters too, such as the quality of basic supervision provided to officers. In this respect, the gravity of the matter is amplified by the

presence of a relatively young, inexperienced workforce – a consequence of the MPS' increased recruitment enabled by the police uplift programme.

5. As I outlined at our meeting on Friday, our recent PEEL inspection has also revealed further systemic concerns. These include:

- a) performance falling far short of national standards for the handling of emergency and non-emergency calls, including too many instances of failure to assess vulnerability and repeat victimisation, failures to provide crime prevention advice and failures to properly advise victims on how to preserve evidence;
- b) a barely adequate standard of crime recording accuracy, with an estimated 69,000 crimes going unrecorded each year, less than half of crime recorded within 24 hours, and almost no crimes recorded when victims report antisocial behaviour against them;
- c) victims not always being informed if their crime was not going to be investigated further, and not always being provided with appropriate levels of advice and support;
- d) when finalising crime reports, victims' views not always being sought and considered;
- e) insufficient supervision and oversight of some investigations;
- f) in roughly a quarter of stop and search cases, failure to record the grounds for the search in sufficient detail to enable an independent judgment to be made as to whether reasonable grounds existed;
- g) disjointed public protection governance arrangements and a disappointingly slow rate of progress in implementing the force's public protection improvement plan;
- h) insufficient capacity to meet demand in several functions, including high-risk ones such as public protection;
- i) a persistently large backlog of online child abuse referrals;
- j) an inconsistent approach to the use of RUI and police bail;
- k) the absence of an effective personal annual appraisal system;
- l) an insufficient understanding of the force's training requirements;
- m) failure to optimise the productivity of MPS resources and assets, including failure to effectively manage the force's digital programme, fleet and estate; and
- n) the lack of a detailed understanding of capacity and capability across all aspects of policing, and an insufficiently comprehensive understanding of demand.

6. There are also high risks associated with the forthcoming implementation of two major IT programmes (CONNECT and Contact & Resolution Service);

7. There are also several examples of high-profile incidents – some recent, some less so – that raise ongoing concerns about the force’s performance, or that are likely to have a chilling effect on public trust and confidence in the MPS (and, in some instances, both). These involve:

- a) the IOPC’s Operation Hotton investigations into misogyny and racism;
- b) the stop and search of British Olympic sprinter Bianca Williams;
- c) the 2020 searches where intimate parts were exposed, involving “Child Q”, “Olivia” and now a third child;
- d) the seemingly incomprehensible failures to recognise and treat appropriately a series of suspicious deaths, in the Stephen Port case, which led to the Mayor’s Office for Policing and Crime commissioning us to carry out a further inspection; and
- e) the murder of Sarah Everard by a (then) serving MPS police officer.

8. Of course, these matters are set against some very considerable successes the force may justifiably claim, and persuasive examples of innovative practice we have found, including several we will cover in the forthcoming PEEL inspection report.

9. Nevertheless, the cumulative effect of so many concerns has prompted us to move the force into Engage.

10. I invite you to make any representations you may wish to make about our decision.

Next steps

11. The next meeting of the Police Performance Oversight Group (PPOG) will take place from **1400-1700hrs Thursday 14 July 2022**, in conference rooms 1B and C, 102 Petty France. I will send you an invitation to attend (either in person or on Microsoft Teams).

12. In advance of that meeting, I believe it would be helpful for us to meet, with Sophie Linden present, to discuss the expectations our decision will create for the new Commissioner (when appointed) and the creation of an action plan to address the concerns I have outlined in this letter.

13. We should also have a preliminary discussion about the criteria I will set for the force to be disengaged from the Engage phase. These criteria will be in respect of progress against the five causes of concern we specified in the Daniel Morgan report, other outstanding causes of concern specified in earlier inspection reports, and new causes of concern we will specify in the forthcoming PEEL report.

14. I will seek a mutually convenient time for us to discuss these matters, before the PPOG meets on 14 July.

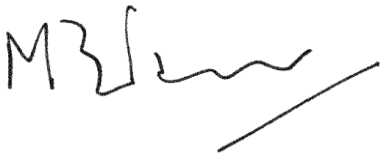
15. Given the rather brief window between now and the July PPOG meeting, I would not expect you to attend the PPOG (or our preliminary meeting) with any detailed action plan for resolving the causes of concern.

16. As the UK’s biggest police force, the MPS’ capabilities, experience, and achievements aren’t in dispute, and neither are the major challenges the force routinely deals with successfully. However, there are lessons that the MPS can and should learn from others. In our experience, the

force hasn't always shown a great willingness to do so. I hope you, and in due course the new Commissioner, will approach the Engage phase as a means of securing some of the support the MPS will need to help it improve.

17. I have copied this letter to Sophie Linden.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Parr', with a long horizontal stroke extending to the right.

Matt Parr CB
Her Majesty's Inspector of Constabulary

Appendix 2

Rebuilding Trust

- Update on progress

September 2022

Summary

Last October the Met [launched 12 immediate priorities to rebuild trust](#) following the conviction of a Met officer for the kidnap, rape and murder of Sarah Everard. We knew and recognised that the precious bond of trust between the Met and our communities was damaged and that we had to do everything we could to rebuild trust. We also know that rebuilding trust will take time and that our actions will speak louder than our words.

Since October 2021, our work to rebuild trust has evolved and will continue to do so:

- In November 2021, we published a draft Violence Against Women and Girls action plan
- In December we provided an [update on our work to rebuild trust and set out a further 8 priorities](#).
- In February 2022, the former Commissioner [wrote to the Mayor of London](#) to set out a number of further commitments to support our efforts to rebuild trust.
- In March 2022, we launched our [new Violence Against Women and Girls action plan](#) based on the feedback we received during the consultation with the public, stakeholders and other partners.
- In July 2022, we published our [2022/23 action plan](#) to deliver our strategy for inclusion, diversity and engagement (STRIDE).

At the start of this year the Met welcomed Baroness Casey to begin [her independent review](#) of the Met's culture and standards. In January 2022 Lady Elish Angiolini also began [her Inquiry](#) into how an off-duty Metropolitan police officer was able to abduct, rape and murder Sarah Everard. We have and continue to support the Inquiry as it progresses its work.

As we near 12 months since we set out our original Rebuilding Trust commitments we wanted to provide an update on the progress against all 20 priorities.

Raising standards

The Met Rebuilding Trust delivery plan set out 11 priorities to support our work to raise standards. Since then we have:

- Completed the **review of all current investigations into allegations of sexual misconduct and domestic abuse** against our officers and staff to make certain that those who made the allegations were properly supported and the investigations were comprehensive. This also encompassed a **dip sample of cases from the last 10 years** where sexual misconduct and domestic abuse allegations were made and those accused remain in the Met, to ensure that appropriate management measures (including vetting reviews) have been taken. Both reviews took place concurrently and included a thorough review of the vetting history of those under investigation to reassure the public and ourselves that our internal processes were the best they could be. We also plan to publish an executive summary of the operation's findings.

- We have **reviewed 40% of cases where officers have been dismissed in the last year for poor behaviour**. During this review we assessed whether there was any learning that would have enabled us to prevent the poor behaviour or where necessary progress the case more quickly, and seek to implement improvements. We plan to publish an executive summary of the operation's findings.
- Progressed the **root and branch review of the Parliamentary and Diplomatic Protection Command** The review has examined the operating model; leadership and supervision; professional standards; vetting; recruitment and representation, and culture. Former Chief Constable of West Yorkshire Police, Dee Collins QPM, co-chairs with Assistant Commissioner Specialist Operations, Matt Jukes, the oversight group for the review, and brings external perspective and challenge to the review, along with a small number of other key partners. This review is entering its final stages and we will publish its findings.
- Management Board made an **immediate investment of additional officers and staff into our Directorate of Professional Standards (DPS)** to strengthen our capability and to do more to prevent and identify the abuse of trust by our people. This supported our reviews and **enabled the creation of a new permanent Domestic Abuse and Sexual Offences team** that specifically focuses on cases related to sexual misconduct, sexual offences and domestic abuse. This unit became operational in January 2022.
- We have **responded quickly to the findings and recommendations from the inspection undertaken by HMICFRS on vetting and other matters**. These findings were published in early 2022, following their counter-corruption inspection. We are implementing the recommendations and are developing our approach in this important area.
- We required all **Line Managers to speak to every officer and staff member to reinforce the standards that must be upheld and we launched a series of internal communications campaigns** to reinforce the proactive duty on all officers and staff to stop any inappropriate behaviours. This work has evolved over the last 12 months including two pan Met standards cascades, the launch of #NotInMyMet - an internal standards campaign and the creation of a 'standards dilemma' series to get our teams talking about how they would manage different scenarios.
- We have worked to **identify new and strengthened ways to address key community concerns** through our external communication, listening, engaging and explaining. We have done this by listening and engaging with audiences that are critical of us or harder to reach. We have improved external channels to ensure we are reaching new audiences and supporting our people in their engagement so they are better equipped to have meaningful interactions and build confidence in the Met. We will continue to find ways to ensure we address key community concerns through strong engagement.

- We have and continue **to explore new ways to assess candidates during initial police officer recruitment** – to understand whether it is possible to fairly identify those who are more likely to compromise on our standards and values. We have reviewed, and continue to explore potential options. We are also working with the College of Policing on the Constable Assessment Redesign Process and have begun a project to review how we communicate our values in our recruitment processes.
- We have delivered the **expedited rollout of a wholesale programme to update all officer warrant cards and staff passes, improving security and providing reassurance of officer identity**. Linked to this, we **reviewed the effectiveness of the recently implemented Safe Connection initiative**, enabling lone women to speak to a supervisor in the local operations rooms, via a video link, in order to confirm identify of lone plain clothed officers.

Improving our culture

The Met Rebuilding Trust delivery plan set out 9 priorities to support our work to improve our culture. Since then we have:

- We have delivered **Operation Signa - an internal programme to ensure our people actively intervene and challenge inappropriate behaviours** built on the feedback of women in the Met. This operation, launched Met-wide in December 2021, includes activities ranging from launching an improved sexual harassment policy, tool-kits for leaders to assist them in identifying inappropriate behaviour and how to deal with it, as well as creating and delivering a training package that will help to create a supportive environment for women to report inappropriate behaviour and strategies for intervention.
- We have delivered **the next phase of our leadership programme ('Leading for London')**, which focused on the skills needed to excel in inclusive leadership. The inclusive leadership campaign targeted all leaders (sergeant/band D up to and including commanders and directors), and has already reached c.70% of our leaders. The next stage of our leadership campaign, focused on creating high performing and inclusive senior leadership teams, is now being delivered.
- In order to **actively address any differential outcomes we see in Staff Survey returns**, the results of the annual staff engagement survey were published internally in November 2021 and were shared externally in December 2021. A full insight report, at a Met level examining trends in the experience of our workforce and how that may vary by demographic, has been reviewed in detail by Management Board. We finalised a series of Board-led commitments to drive action to improve the experience of working in the Met for all our people that included committing to 15 areas of improvement under the headings of Making it easier to do your job (e.g. IT and training), Well led, Well equipped, Well supported and Inclusion – Rebuilding Trust. This priority has been delivered with all leaders across the Met expected to discuss staff survey results with their staff to seek further ideas for improvement, and to commit to local action plans in response.
- We will **continue to invest in leadership development for women and underrepresented groups**, by delivering two targeted career development programmes: "Inspiring Leadership" for Black constables and "Lead On" for women and/or Black, Asian and Multiple Ethnic Heritage colleagues at Sergeant, Inspector and staff equivalent level. Building diversity at these ranks is important as they are recognised as critical leadership roles. These ranks are key to developing trust both internally and externally as they set the tone for their officers and staff and how they interact with our communities and partners.
- We have **strengthened the support we provide to any person who uses our 'raising concerns' approach**. This has included improving our signposting and creating of a

statement of expectation for those that raise a concern. We also direct officers and staff to external mechanisms of how to raise concerns should they prefer to do that. We have created spaces for probationers as part of their courses to allow them to raise any concerns when they return from BCUs. In our promotion courses we now have an interactive exercise that helps support line managers on how to support staff if they raise concerns.

- We have created a Learning and Prevention Tool in response to the Priority We will **'create a risk assessment process and develop a training package'**. Together these help supervisors understand the risk factors that may lead an officer or member of staff to be more likely to commit misconduct, and how they may be able to intervene. The Learning and Prevention form was devised following the findings of the London Ethics Panel research and consultation with a number of internal stakeholders, including the Metropolitan Police Federation. The tool is designed to assist managers at varying stages of support and intervention.
- We are investing in the **use of information technology to help us better prevent misconduct** by focusing on interventions. We are doing this by enhancing our capability in two areas 1) Lawful business monitoring and 2) in our data auditing capabilities.
- We **refreshed our flexible working policy** to actively support the employment of our workforce by expanding further our commitment to flexible working models that promote a positive work-life balance. We made changes to how line managers are expected to respond to flexible working requests to ensure timely responses and that requests are looked at holistically by wider management teams to give the greatest chance of being able to accommodate requests.
- We **continue to keep the Met's Values under review** and await the outcome of Baroness Casey's independent review of our culture and professional standards. The Met's values are being considered as part of the culture programme work.

Former Commissioner's Commitments:

In February 2022, the former Commissioner wrote to the Mayor of London ¹to set out a number of further commitments to support our efforts to rebuild trust. That letter included a number of significant commitments that we have made substantial progress on, including:

- The Acting Deputy Commissioner personally briefed over 700 newly promoted Sergeants. The briefings set out clearly the standards of behaviour and leadership we expect. The sessions included time with senior leaders such as B/OCU Commanders, senior Police Staff and the A/Deputy Commissioner herself. In

¹ www.met.police.uk/SysSiteAssets/media/downloads/met/about-us/letter-met-commissioner-mayor-of-london-feb-2022.pdf

addition they included a 'dilemma scenario' which was discussed in breakout sessions led by senior leaders followed by a Q and A session with the Acting Deputy Commissioner.

- We have rolled out across all the Met's B/OCUs the Command Assessment of Standards. Asking our senior leaders to self-assess their command in relation to five initial areas; Management of Long Term sickness, Personal Issue Police Equipment, Declarable Associations, Gifts and Hospitality and Business Interests. We are now analysing the results of these assessments to drive improvement and share good practice. We also plan to evaluate with the support of the Directorate of Audit, Risk and Assurance's (DARA) the Assessments to consider how this format may be applied across the Met in the future.