

MOPACMAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL

3 October 2022

Governance Improvement Plan Update

Report by: Acting Chief of Corporate Services

Report Summary

Overall Summary of the Purpose of the Report

This report includes the revised Governance Improvement Plans arising from the 2021/22 Annual Governance Statement (attached as Appendix B). The draft AGS was presented at the July 2022 Audit Panel, and this report incorporates both the new areas for improvement, along with those outstanding, carried forward from the 2020/21 AGS.

Interdependencies/Cross Cutting Issues

The AGS cuts across areas of improvement highlighted through inspections, audits, performance monitoring, risks, and senior leaders' assurance statements. As such, they have significant interdependencies with other Audit Panel agenda items – specifically HMICFRS recommendations, DARA audits, as well as our Risk Management activity and MOPAC's own AGS and Governance Improvement Plan.

Recommendations

The Audit Panel is recommended to:

- a. Note the new format of the Governance Improvement Plan to align with CIPFA principles and MOPAC's approach
- b. Note the progress made in the recent quarter – and specifically on some longstanding Learning and Development actions.

1. Supporting Information

- 1.1. The Governance improvement Plan has been restructured and formulated into one plan rather than the previous multi-plan document. The aim was to better align to the AGS structure along the seven CIPFA principles (and similarly we are reorganising the theming of DARA recommendations along these seven categories). Another objective has been to bring more consistency with MOPAC's approach, so that there could be better read across.

- 1.2. Whilst the AGS reviewed the matters arising from 2021/22, from audits, inspections, senior leaders' assessments, risk registers and other sources, two key events have taken place since that will influence and strengthen the governance improvement plan:
- The MPS being put in Engage phase by HMICFRS: strategic and detailed plans are currently being developed to address both HMICFRS' recommendations from the PEEL report, as well as tackle the causes of the findings. Actions in the GIP support many of these: training and capability, standards and professionalism, and we do not wish to create duplication in terms of reporting. However, we will enhance the live Governance Improvement Plan to include high level reporting on Engage, particularly on how the Met links up demand and resourcing (see 1.11) – not currently captured in the GIP.
 - The New Commissioner started in September: work has started to develop a new strategy and implement his key strategic priorities (through the 100-day plan). These priorities (such as data driven delivery and innovation, integrity, renewed leadership and supervision) will strengthen areas identified as weaker in the AGS. Again, the Governance Improvement Plan will aim to capture this as it develops, where relevant to the areas identified.

Key achievements and completed actions in the past quarter:

- 1.3. **Learning and Development:** the Learning Target Operating Model (LTOM) went 'live' in August 2022, enabled by the rollout of the Learning Management System (LMS) which was also implemented in August. Support is in place to assist new users with the LMS during the early stages of the rollout. Work is ongoing to embed both the LTOM and LMS. Work also continues to transform the core investigative training (PIP2), with a target date of February 2023.
- 1.4. **Standards and Professionalism** Actions from the Rebuilding Trust plan are actively being managed, with 13 completed, and 9 continuing within timescales. B(O)CU Commanders and Director level management have completed Command Assessment of Standards for their area of business, which are being reviewed at a corporate level.

Notable areas for improvement:

- 1.5. **Organisational Learning (OL).** Plans are in place to continue with the development of OL hubs across the Met, but a lack of resourcing is hampering the speed of deployment. However, there is a bid for resources currently awaiting approval. The work strands have all been identified, with the programme planned to be in place by Q4 2023/24.
- 1.6. **Assurance Controls, Levels 1 and 2.** A corporate Policy strategy is in place, and a number of policies have now been published or awaiting approval. The Data Quality Ethics Assurance Board (DQEAB) remains suspended pending decision on its future. A plan has been developed to map assurance and improve the management of level 2 assurance across the Met.

- 1.7. **Digital and data:** a draft Digital Data and Technology blueprint has been reviewed by the Board in July, with further activity being undertaken as part of the new Commissioner’s 100 day plan. Developing data capability, to create better public outcomes and support a better use of policing resources is a key priority for the new Commissioner. Activity has therefore been reinforced.

New areas for Quarter 2:

- 1.8. The Governance Improvement Plan is a live improvement plan and two further actions will be introduced in the coming quarter to reflect DARA feedback:
- “Through the Engage process, develop an improved mapping of resourcing to demand, building on the Force Management Statement findings and linking to Year 3 Growth decision”
 - “Consider financial management arrangements against CIPFA’s Financial Management Code”

2. Equality and Diversity Impact

The governance improvement plans contain a number of actions that aim to strengthen our engagement of communities and impact positively on equality and diversity within the Met and externally.

3. Financial Implications

There are no direct financial implications. The costs associated with the areas of work identified in this report will be met from the relevant unit’s budgets.

4. Legal Implications

MOPAC and the Commissioner of Police are both under a statutory duty to approve an Annual Governance Statement (AGS). In order that it can discharge the duty, the MPS prepares an AGS, against the CIPFA Principles (Delivering Good Governance in Local Government: Framework 2016), which demonstrates how aspects of governance have been implemented within the service, and from which the Governance Improvement Plan stems.

5. Risk Implications

The annual governance review identifies significant governance areas for improvement across the Met, monitored quarterly and aligned with corporate risk processes.

6. Contact Details

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7. Appendix

Appendix 1: Met Governance Improvement Plans 2022/23 – Official Sensitive

Appendix 2: Annual Governance Statement 2021/22



Annual Governance Statement 2021/22

Commissioner of Police of the Metropolis

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Introduction

To meet the demands of policing London effectively, the Metropolitan Police Service (the Met) must have in place a responsive system of governance, with clear mechanisms, processes and relationships through which the organisation is directed and controlled. This means decision-making processes and internal controls that support and strengthen our operational activity.

The Met conducts an annual review of the effectiveness of its system of internal control and publishes this statutory Annual Governance Statement (AGS) with the Statement of Accounts. The document reports on compliance with the Local Code of Governance in identified key control areas and aims to provide assurance that the Met is monitoring and managing governance arrangements set out in the Code effectively. Our Local Code of Governance (Code) is established within the Chartered Institute of Public Finance and Accountancy (CIPFA)/ Society of Local Authority Chief Executives (SOLACE) Framework 2016 with due regard to the Met's operating environment. The overall aim is to ensure that resources are directed in accordance with agreed policy and priorities, that there is sound and inclusive decision-making and clear accountability for the use of resources to achieve desired outcomes.

This draft AGS sets out the Met's current governance arrangements, including controls and processes, reports on their effectiveness during the year and outlines the areas in which we want to improve governance further over the coming year. Amongst those, we highlight HMICFRS inspection of the "Metropolitan Police Service's counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel", where the inspectorate's found the Met's counter-corruption arrangements and procedures had substantial weaknesses – the implementation of the Inspectorate's recommendation will be actively pursued and progress closely monitored. More widely, this document has been informed by the input from senior staff and officers who have responsibility for the development and maintenance of the governance environment, and in consideration of the opinion of the Director of Audit Risk and Assurance.

Overall we conclude that the Met has an adequate system of internal control which facilitates the effective exercise of the Commissioner's functions. The Met's governance framework and arrangements can provide a reasonable level of assurance, but we acknowledge that even if all of areas were effective we would not eliminate all risks. DARA's audit opinion is that "the MPS has an adequate internal control environment, increasing risk maturity across the organisation and implementing a more defined and cohesive approach to assurance provision, remain key to securing improved effectiveness".

This report identifies areas for improvement and strengthening: the AGS outlines how the Met will further improve its governance in the coming year – including through the Command Assessments of Standards - taking account of the opinions of the Met's internal and external auditors.

In addition, work will also be taking place in the coming year to develop an Assurance Mapping approach – strengthen our internal assessment of controls, and drive risk maturity and good organisational risk management across directorates.

HMICFRS and MPS leadership

Since its development (the AGS focuses on the 2021/22 financial year), the MPS has been notified by HMICFRS that it would be put into the *Engage* process. The Government Improvement Plans will help strengthen areas where HMICFRS set recommendations in their forthcoming PEEL report (expected September 2022) and actions will dovetail with the *Engage* process and structures put in place to tackle the issues identified. Experience, training and organisational capabilities are common themes in the AGS and the PEEL report. In addition, Engage will drive reviews around demand and resourcing, to ensure the MPS can address changing demand in a local context, and at first contact.

The new Commissioner, starting in September 2022, also has ambitious plans to drive performance, strengthen integrity and raise trust in the MPS (*"More trust, less crime, high standards"*). The actions in this report will support his priorities. A new corporate strategy will be developed that also takes account of the Mayor's new Police and Crime Plan. Accompanied by a new Performance Framework, this will set out what interventions are necessary to achieve the desired outcomes and how progress and success will be measured.

Statement of internal control

The Met Statement of Internal Control survey was refreshed in 2021, with over 80 of the most senior leaders across all Business Groups asked to take part. The survey has since 2020/21 been aligned along the seven CIPFA Governance Principles structure. The findings have been analysed and, across all questions, confidence is lower than last year, reflecting that there have been a number of high public profile cases where the Met's integrity has been scrutinised and which perhaps provides leaders less confidence to sign off that - within their area of control - the Met was fully compliant within the headlined governance principles. The areas where Met Leaders identify the need for further action are particularly around Data (quality and compliance, as well as exploitation) and Capabilities (gaps and experience levels). The strengthening of controls and processes in these two areas - and other areas of weaknesses highlighted in the document - will be taken forward through our forthcoming Governance Improvement Plan.

1- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

Assessment of current position and recent progress

We recognise the grave levels of public concern following the kidnap, rape and murder of Sarah Everard and the sentencing of the police officer responsible. Other deeply troubling incidents and allegations have raised further difficult questions for us. We are committed to rebuilding the trust and confidence of all Londoners.

Whilst the section below sets out the structures and strategies we have in place, as well as the recent progress we have made since the publication of our Rebuilding Trust Plan in October 2021, we acknowledge this is an area that needs, and will receive, substantial continued effort, before public trust and confidence can increase.

Our vision is to be the most trusted police service in the world. We contribute to making London safe for everyone and want Londoners to be proud of their police service. As a service we are bound by the national [Code of Ethics](#). Our Competency and Values Framework outlines the behaviours that will help us to deliver a great service to London. Our [values](#) (Professionalism, Integrity, Courage and Compassion) shape and guide the way we work. One of the pillars of our strategy, Met Direction, is "to be recognised as a responsible, exemplary and ethical organisation" so our objective is not only to behave in accordance to our values, including integrity, but to be recognised as such by the public, partners, communities and stakeholders.

- Operations: our Directorate of Legal services provides advice on a wide range of issues such as employment issues, police operations, investigation and use of police powers such as detention, use of force or covert investigatory powers. We have a dedicated professional standards department of more than 350 officers and staff.
- Complaints, misconducts and counter corruption: the Directorate of Professional Standards leads our response supported by a number of policies, toolkits and guidance to support the reporting of wrongdoing and to mitigate corruption threats. Key areas of focus are sexual misconduct, theft and fraud, drug use and supply, inappropriate associations, organised crime, social media and disclosure of police information.
- Vetting processes follow the national standards set by the College of Policing. As part of the recruitment process, the MPS vets officers, staff and volunteers to uphold public confidence, national security and safety. Enhanced vetting procedures are in place for sensitive posts. We recognise that vetting is a snapshot in time – and if we determine that an individual has lied during the vetting process, this would be investigated by DPS and can lead to dismissal and criminal investigation.
- Training: the new PEQF (Police Education Qualifications Framework) is based on the national curriculum developed by the College of Policing – professional standards, ethics and integrity are central components woven through the recruit training programme and supporting assessments.
- Oversight: there is substantial governance, oversight and scrutiny in place within the MPS and externally to ensure that we act appropriately. The leadership team is accountable for effectively governing the organisation and making ethical decisions. DARA, our internal auditor, has a statutory responsibility to give an annual opinion on the effectiveness of the internal control and governance framework supporting the policing of London. We review and implement DARA's recommendations on an ongoing basis. We are scrutinised and held to account by MOPAC, the Greater London Authority and national government (principally the Home Office). There are a number of formal meetings (such as the Oversight Board with the deputy Mayor). Boards and Committees (such as the Home Affairs Select Committee) which are used to monitor how the organisation performs and to ensure we act lawfully and ethically.
- We are also overseen by independent bodies: Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses and reports on our effectiveness, efficiency and legitimacy – including in the field of counter-corruption. The Independent Office for Police Conduct (IOPC) conducts independent investigations of serious allegations of misconduct or criminal offences and oversees all public complaints and conduct matters. Public scrutiny also holds the Met into account (Mayor's Questions, Freedom of Information requests, independent advisory groups...)

In June 2021 we launched a new Raising Concerns policy, which replaces the existing 'Whistleblowing Policy' and broadens the approach to raising concerns from anyone about anything. We complemented this with an internal communication campaign to raise awareness and confidence in the new policy, and regular Directorate of Professional Standards updates will be provided to staff. We delivered the Inclusive Leadership campaign, which continues to build our leadership capabilities around diversity and inclusion.

In the context of our current Governance Improvement Plan on Competence and Standards of Professionalism, and as part of our delivery of the [Rebuilding Trust Plan](#), we have made progress on a number of fronts:

- A New Counter Corruption Board has been established chaired by DAC Professionalism to review and drive activity against the national counter corruption key areas of risk.
- A change programme is now set up to look to redesign how the MPS deals with complaints and how the most appropriate model in terms of structure and resources is implemented to do this. The first step is the Complaints Resolution Unit which has been established in February 2022 and will resolve most complaints being submitted through MPS and IOPC portals, with significant reduction of cases referred to Professional Standards Units.

- A dedicated Vetting Renewal Team is in place to manage vetting renewals and will further be increased in 2022 through recruitment. The backlog of vetting renewals has now been cleared and is being managed through a BAU process.
- Eleven of the 13 recommendations of the DARA Security Clearance & Vetting follow up report have been implemented. However, notably, the implementation of the new Vetting IT system has been delayed due to a dependency on the core system upgrade and a replacement Met Internet Gateway project to improve performance and download limitations – resulting in slippage to next year.
- The appointment of Baroness Casey of Blackstock to conduct an independent review of Met culture and standards. The Review will examine our culture and standards of behaviour, and will assess to what extent our current leadership, recruitment, vetting, training, communications and other processes effectively reinforce the standards the public should expect.

Q1) I am confident that officers and staff in my area of responsibility behave with integrity, comply with laws, regulations and policies, and behave ethically

YES 64%, PARTLY 36%, NO 0%

SUMMARY FINDINGS

- This is an area in sharp decrease from last year – undoubtedly linked to the events of recent months. Whilst leaders are confident this applies to the vast majority of staff and officers in their area, they are more circumspect about signing this off as a general statement.
- In Frontline Policing, leaders view is that most officers and staff behave with integrity and professionalism and that processes are in place to identify misconduct, and that such cases are dealt with efficiently. However, issues continue to be identified, locally and through central work on standards. Two areas have been highlighted for improvement:
 - The time misconduct cases take is too long, with officers suspended on full pay for months or even years. This sends out a very negative message to the public.
 - More support and leadership is needed for sergeants (including acting roles) and equivalent, whose role is very important as first line manager.
- Within Met Ops, Professionalism, and Specialist Operations (SO) there is also confidence that processes are in place in terms of meeting structures, oversight, external scrutiny, communication and escalation which help identify misconduct and poor behavioural issues; and that the majority of staff behave ethically and with integrity. It is recognised that there are still incidents of misconduct but there is confidence that these are dealt with effectively. Training, and specifically on-line training is not regarded as sufficient, and not all policies are communicated well enough.
- In Corporate Services Directorate, consensus is that professionalism is high. Regular briefings take place to enable messages and staff discussions regarding behaviour, culture and expectations.
- Digital Policing responses highlight that the staff survey has shown the directorate to be generally well managed, and satisfaction amongst staff to be high, but notes a lack of clarity concerning corporate policies and procedures.

Further work and improvements required

Our Rebuilding Trust plan – published in early October 2021 – outlined the Met’s immediate priorities to raise standards and improve our culture. A dedicated team has been set up to support delivery of this work led full-time at commander level. Detailed commitments, from a root and branch review of the Parliamentary and Diplomatic Protection Command to a review of all current investigations into allegations of sexual misconduct and domestic abuse against our officers and staff, are [published](#), and our [progress against them will be reported regularly](#).

In parallel, Baroness Casey of Blackstock was appointed to conduct an [independent review of Met culture and standards](#). The review will include how we combat misconduct, drive up our standards for better

behaviour among ranks, as well as how we can react more openly when things go wrong and improve our transparency as an organisation.

In March 2022, HMICFRS published "[An inspection of the Metropolitan Police Service's counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel](#)". They identified a number of causes of concern and made recommendations related to this governance improvement area. They found a "lack of proactive work to gather counter-corruption intelligence", a "lack of monitoring and oversight of declarable associations, business interests and gifts and hospitality" and that "the current professional standards operating model within the MPS is a cause of concern". Over the course of the next year, the MPS will address the recommendations: a plan to deliver the actions set out in the control strategy has been developed and shared with our oversight body.

A number of recommendations are related to vetting; the MPS will seek to address them by determining the vetting status of all personnel in designated posts and as soon as possible thereafter, ensure that all designated post-holders are vetted to the enhanced (management vetting) level and will provide continued assurance that designated post-holders always have the requisite vetting level. HMICFRS also recommended that the MPS should:

- ensure that all police officers and staff are made aware of the requirement to report any changes to their personal circumstances and establish a process whereby all parts of the organisation that need to know about the changes are always made aware of them.
- strengthen business interests monitoring procedures,
- facilitate the presentation and exchange of corruption-related intelligence (with effective and auditable processes), to identify officers and staff who may present a corruption risk

HMICFRS made other recommendations in respect of declarable associations (revising policy and procedures, conducting risk assessments and maintaining effective oversight of processes and registers), as well as the sufficient resourcing of the units concerned with the effective monitoring of all MPS personnel assessed as presenting a high risk of corruption.

We will improve assurance of how we identify and manage risk, including through command assessments, and use these to improve commands where we identify that risk management is weak. The Command Assessment of Standards will need to be completed by every leader of a command unit to enhance accountability, oversight and scrutiny of standards and the professional health of units across the Met. These assessments will be scrutinised at Management Board level, and by MOPAC and Audit Panel. The rollout of the first iteration will take place in Quarter 2, 2022/23.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:

- Continuing delivery of the Rebuilding Trust Plan including raising standards, culture audits and Command assessments.
- Enabling the delivery of Baroness Blackstock independent review and addressing findings
- Implementing HMICFRS recommendations in its Counter Corruption Arrangements report
- Strengthening Professionalism's capacity, corporate communication and reporting channels,
- Working to address the experience gap through better supervision, clear accountability, and continuity of management
- Introducing Command Assessment of Standards across the Met

2- Ensuring openness and comprehensive stakeholder engagement

Assessment of current position and recent progress

We aim to be a trusted partner, effective in mobilising partners to keep London safe for everyone. We seek to build relationships and engage with communities across London, to prevent crime and inspire trust and confidence in policing. We have a number of structures in place which support delivery. The Crime Prevention, Inclusion and Engagement (CPIE) command holds responsibility for internal and external partnerships. These relationships build assurance that our organisation is progressing to achieve a fully inclusive culture and delivers policing with a greater focus on prevention and engaging with diverse communities. CPIE leads on our partnerships with our external corporate IAGs and community reference groups; our Staff Support Associations, and deliver the Met Outreach Recruitment Strategy to build an organisation reflective of the city it serves. We published a new [Community Engagement Handbook](#) which sets out clearly how the Met engages with the communities it serves.

The new [Inclusion, Diversity and Engagement Strategy](#) (Stride) was developed through extensive consultation and published in September 2021. An implementation plan is set on an annual basis. Governance mechanisms are in place: performance is measured through the STRIDE Delivery Board, chaired by AC Professionalism and attended by MOPAC and other external groups including IAGs, and progress is good.

We also consulted on, and published our [action plan to tackle violence against women and girls](#) which aims to increase women's confidence in the police so as to improve the reporting and investigation of crimes which disproportionately affect women and girls within London, and to intensify work with our partners and with women to improve prevention and victim care. As part of this, we organised Walk and Talk sessions on every BCUs, focused on violence against women and girls, where women join officers to help us identify areas where they don't feel safe. We also engaged with businesses in the night time economy sector to provide training given to licenced premises employees and raise awareness of tools - such as Ask for Angela - that can prevent or assist victims.

We know that Black Londoners have less confidence and less trust in the Met than white Londoners and that there remains a persistent gap. We are also aware that some police tactics impact disproportionately on the Black communities. To understand and address some of the drivers and issues, we are working with the Mayor and MOPAC to deliver the Mayor's Action Plan – as well as additional initiatives from Deputy Commissioner Delivery Group established in November 2020. Progress is reported through the [MOPAC MPS Oversight Board](#).

Q2) I am confident that within my area of responsibility there are clear and effective communication channels and consultation arrangements with stakeholders and service users on priorities, resourcing and policing activity.

YES 79%, PARTLY 21%, NO 0%

SUMMARY FINDINGS

- Frontline Policing reported considerable efforts on stakeholder engagement both at points of criticality, but also through business as usual (BCUs engagement plans for example. Local communities, councils, MPs, community groups and service users are engaged at two levels: strategically (IAG, reference groups) with CPIE, and at a local level (surveys, ward panels). Improving representation at Independent Advisory Groups (IAGs) and communication with under-represented groups – such as black communities - are two areas of improvement.
- Met Ops responses were positive to this statement, underlining the key roles that stakeholders play in their areas of work. There are effective channels of communication and consultation and

good stakeholder mapping. MetCC is of course one of the vital interfaces with the wider public. For some pieces of work however, channels for appropriate escalation may not always be clear.

- Professionalism reported good engagement structures, linkages with key stakeholders and national bodies. However, more work is required to further improving communications with communities who have limited trust in the Police.
- In Specialist Operations all OCUs are able to demonstrate that there are clear consultation and communication channels available both within the Met, and with key external stakeholders and national bodies.
- The responses in Corporate Services and Digital Policing show good internal stakeholder engagement structures in place (from business partnering to networks in place) as well as consultative, communication and reporting arrangements. One issue raised was the limitation that technology, and in particular the Intranet, posed in terms of consultation at scale, and getting the message across when there are many concurrent initiatives.

Q3) I am satisfied that within my area of responsibility, our decision and service delivery processes engage partners closely and take account of service user needs effectively.

YES 74%, PARTLY 26%, NO 0%

SUMMARY FINDINGS

- There are good engagement processes and structures in place across Frontline Policing, to engage partners. However, there remain areas for improvement: speedier response to victims, and gaps in commissioned services or support not specifically owned by the police (e.g. mental health).
- Engagement with partners is a key necessity for units within Specialist Ops in order to function effectively. This is working well, with one area for improvement raised around better information sharing with partners, for which activity is ongoing.
- Digital Policing, Professionalism, Met Ops and Corporate Services' engagement and business partnering processes are established, but some activity is underway to get broader feedback from service users. Speed of service design (internally), and resourcing engagement (externally), are highlighted as two constraining factors.

We have a number of structures which drive relationship and progress with communities where there are also gaps in confidence (such as the LGBT+ Organisational Improvement Group and the Disability Delivery Group – both with external representation).

In the context of our current Governance Improvement Plan on Public and Partner Engagement, in the last year, we have:

- Established and staff the London Safety Centre, published the STRIDE strategy, with performance measured through the STRIDE Delivery Board, and embedded into the processes of CPIE.
- Effected the rollout of Police Encounter Panels having resolved to the complexities of Data Protection and legal sharing of data. Within Stop & search, a new community engagement product "A Different View" is now utilised. As at January 2022, over 66 Community Monitoring Groups screenings of Body Worn Videos had been facilitated across 23 boroughs, in an initiative aimed at raising confidence of communities and partners.

In key areas, we have established clear partnership priorities, and developed effective operational partnerships:

- We set up the Child Exploitation Pan London Operating Protocol in close collaboration with the Children Safeguarding Board, the NHS and London Councils. In addition to key partner briefings, over 3,000 colleagues (including response teams, parks and roads police and all youth strands) have now been provided with training and information regarding the requirements of the protocol.
- The Met and local authorities now share a common platform to facilitate digital uploads. The London Office for Innovation and Technology, the Met and other partners are in active negotiations to fund

a permanent administrator to expedite data sharing across partners (and a common hosting platform).

- The CT Command developed national guidance on the management of families returning from conflict zones which has been shared across the London Director Social Care Network, supporting effective integration and risk management of children and vulnerable adults into the UK. We have seen the positive impact of developing relationship with key partners, the department of Homeland Security and local authority leads, in better understanding the challenges faced by these families.
- DARA's audit on digital engagement with the public – online crime recording (October 2021, rated adequate) highlighted, amongst areas of effective practice, how the Single Online Home developed following wide consultation ensuring public accessibility and improvements met public needs, as well as the collaborative agreement between all forces sharing the SOH service hosted by the Met.
- The London Firearms Board, chaired by the Met and attended by NCA, NFTC and Border Force has embedded the relationship between all partners. There are improved connections of upstream firearms intelligence leading to more activity. Enhanced forensic opportunities are being exploited.

Further improvements we need to make

HMICFRS published their findings from the Met's National child protection inspection assessment of progress in September 2021. Whilst they acknowledged the Met had made progress, they identified areas that need further improvement including how the force investigates online abuse and the viewing and sharing of indecent images of children. We will work to improve this over the coming year.

Positive Activity Initiatives (deployment for three or six-week periods of all our Citizens in Policing into areas of violence and low confidence) in BCUs initially took longer to set-up than planned, but will now continue apace as an essential tool to build confidence locally with communities, managed through our crime prevention and trust governance. We have established clear partnership priorities, and as one of the BCU core commitments, monthly meeting with key strategic partners such as borough Chief Executives and local community safety leads have been held. This will continue, in order to consolidate engagement. We will also increase dialogue with communities on specific issues to build trust (e.g. tactics such as Stop and Search).

A number of DARA audits also raised areas of improvement in how we work with partners including:

- The alignment of risk management and partnership management guidance to facilitate effective risk identification and management with key partners. Risk Management Framework audit (December 21)
- The review and update of Service Level Agreements between Met Detention and other internal stakeholders (Met Detention Delivery Framework – Capacity and Capability audit, May 21, Limited)
- The review of internal communications to ensure accurate advice is provided to appropriate officers and staff in the context of Case File Management – Disclosure (Audit follow-up review May 21, Adequate), noting that collaboration between the Met and its partners has improved through a number of actions (Co-location of Met's Head of Criminal Justice Partnership and the CPS; Analytical work into cause and impact of disclosure failures; dashboards; Rape Joint Improvement Plan to address victim attrition).

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:

- Developing a communication strategy to improve our engagement with Londoners
- Driving continued implementation of Stride through a refreshed Action Plan for 2022/23 and embedding the changes effected through the Deputy Commissioner's delivery Group and Mayor's Action Plan to reduce gaps in trust and confidence
- Increasing engagement with the public and partners, building on the consultation exercises we ran for the VAWG Action Plan and STRIDE

- Improve data sharing and risk management in our partnership work (such as MASH and victim engagement)

3- Defining outcomes in terms of sustainable economic, social and environmental benefits

Assessment of current position and recent progress

The Met has substantially strengthened its position in recent years by defining clear outcomes (measured and monitored via the Performance framework, and aligned with the Met Direction). The performance framework set out what the Met is trying to achieve, what good looks like and how it will be measured.

Quarterly business plan progress reports are reviewed by Oversight Board, Performance Board and Performance Group and published on our website. Substantial collaborative work took place with MOPAC to develop the Mayor's new Police and Crime Plan and to now cascade the plan into the Met Business Plan. We are also working with the Greater London Authority and partners to maximise our role as an [Anchor Institution](#), to support our capital's sustainable recovery. With these solid foundations, evidence-based insight underpins and informs actions at every level of the organisation. For example, the DARA audit on Gun Crime, Resources, Deployment and Capability (July 21, Adequate) highlights the development of the Firearms Strategy (2020-25) and its alignment with the Met, Business Plan and Met Direction as an area of effective practice.

In the context of our Governance Improvement Plan on Data Management, we launched the 'Year of Quality' in January 2022. Good progress continues to be made across the plan: Information Asset Owners (IAOs) plan approved, contract established with IAOs and Data Office and training package for IAOs completed. The Head of Data Foundations role recruitment is now underway. An MPS-wide Learning Needs Analysis for Data was completed in 2021/22.

Q4) Within my area of responsibility, we are clear about the outcomes we want to deliver towards the Met Direction, and on the economic, social and environmental benefits/ impacts of our decisions

YES 74%, PARTLY 23%, NO 3%

SUMMARY FINDINGS

- There was clarity and buy-in across Met Ops and Frontline Policing with regards to the Met Direction (in parts because it has been in place for a while), with priorities well understood and communicated – and a performance framework that cascades into decision and operational work. As with other Directorates, within Professionalism there is clear understanding of their contribution towards the strategy as well as effective channels of communication and oversight in place.
- Whilst in Specialist Ops, the statement also receives a positive response, leaders highlight that because of the national remit, there is less understanding from junior ranks of how Met Direction applies, and how OCUs deliver outcomes towards it.
- In Corporate Services and Digital Policing, most respondents consider this to be an area of strength – from the use and the clarity of the strategy, cascading to investment prioritisation, business case articulation, and defining economic / social benefits. There were views that business case processes could be simplified.
- One recurrent area of weakness raised by a number of respondents across business groups was around the implementation and tracking of environmental benefits.

The DARA audit on Benefits Realisation and Performance (Follow-up review May 21, Adequate) noted that governance had been boosted by the introduction of the PIB Level2 governance group providing assurance on business cases and business justification papers and that Benefits Handover Certificates transferring responsibility for benefits realisation and tracking were being issued at programme closure. However work is still required to develop a system to support the management and realisation of benefits for the high-risk / high-value “business as usual” projects or proposals.

Further improvements we need to make

Whilst DARA’s audit on Information Management, Data Quality including Workforce Data (May 2021, Limited) noted progress in terms of:

- Assurance on data quality and wider compliance issues obtained via key meetings and boards with defined stakeholder engagement across business groups.
- Met insights a data tool being developed to identify crime hotspots, highlight priorities and display information quickly in dashboards and being evaluated to improve DQ reporting.

It also raised the need to improve metrics, KPIs and data reporting standards. An Advanced Analytics Strategy is in place, which will help improve strategic outcomes.

Also, in response to DARA’s Environment & Sustainability audit (September 21, Adequate) decision-making template have been amended to include reference to sustainability and environmental factors, but the assessment from Met leaders is that further work is required in how the organisation implements and track these environmental benefits.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:

- Strengthening Data Quality work with the Year of Data Quality; and implementing the Information Asset Ownership plan.
- Completing a review of Public Protection Policies and widen to look at the Heads of Profession Investigation portfolio
- Exploring the implementation and tracking of environmental benefits further

4- Determining the interventions necessary to optimise the achievement of the intended outcomes

Assessment of current position and recent progress

The Business Plan outlines the Met’s key operational priorities for policing London. It also articulates the specific initiatives and actions we intend to take, in the short and medium term, to deliver against the Met Direction. Determining the interventions is done through the enhanced business planning process using a number of channels including:

- We have used the Force Management Statement process to assess resource, demand and capacity and capability gaps; with policing commands setting out their plans to improve effectiveness.
- Corporate work and engagement with the Board identified a number of challenge areas that needed acceleration and focus (TRUST, CONFIDENCE and ACCOUNTABILITY; VIOLENCE AGAINST WOMEN AND GIRLS; DETECTIONS; DIGITAL AND DATA)
- Strategic priorities for policing expressed in the Beating Crime Plan and the new Police and Crime Plan and cascaded into actions.
- In line with last year’s AGS areas of focus, a Blueprint 2029 was developed to expand Met’s future thinking about the capabilities it will need long-term. This now feeds into both planning and transformational work.

In addition to the enhanced business planning, we have pursued work from the Transformation Directorate in terms of the operating models to ensure structures are fit for purpose in an evolving operating environment (both Met-wide, and at Command level, such as the implementation of Phase 3 of the Intelligence Target Operating Model in September 2021).

Further improvements we need to make

Q5) I am satisfied that in my area of work we have the information we need to drive decision-making, plan the interventions that will achieve our objectives, and that the processes and governance across my unit support the achievement of our intended outcomes
YES 51%, PARTLY 49%, NO 0%

SUMMARY FINDINGS

- Confidence in this area is less strong, in the main linked to data and systems.
- Frontline Policing have good processes and local governance structures in place but suggest that more analytical support could improve this further.
- Met Ops identifies good systems in place to deal with information and data, but limited feedback (on the effectiveness of its support to other parts of the Met, or from strategic boards) can hinder further insight. Specialist Ops OCUs have the information they need and work closely with partners and stakeholders (noting some gaps in core skills data).
- Corporate Services and Digital Policing leaders report that effective decision making processes are in place across all areas, supported by the business partnering model. Best practice is followed in transformation, project and change management delivery to the standards in place elsewhere in the public sector. However, the lack of speed can be a constraint. Additionally, whilst there is strong organisational commitment and improvements on data, the right data is not always available to help the organisation prioritise, but that activity is underway to improve on this.
- Professionalism's assessment is more mixed. Information can be out of date, or access can be hampered by IT systems or technology and organisational learning is at a nascent stage and needs maturing. On both fronts there have been some improvements, but more is required.

Within its Child Protection report (September 2021), HMICFRS stated that "*senior safeguarding leads show focus and oversight in improving child protection across London*", however there is still more to be done to see sustained improvements in other areas and decision-making. This includes the way in which registered sex offenders are managed, how online abuse and exploitation investigations are conducted and how digital devices are examined are of particular importance.

The Met received eleven IOPC learning recommendations as part of its review of the application of stop and search powers. Eight of the recommendations have been completed and are embedded into every day practice. Operation Coniston was rolled out in October 2021, whereby randomly selected search BWV encounters are reviewed by supervisors and officers, to identify learning and good practice as part of continuous reflective practice. Three of the recommendations are ongoing, including supervision around the use of stop and search powers: BCU lead officers scrutinise reports to identify teams and individuals where supervision is not being carried out promptly and take action to rectify the problem.

DARA have raised areas for improvement to optimise outcomes in some of the audited areas:

- TSG use and deployment of resources (Follow-up review May 21, Adequate): further work needed on the definition of expected outcomes in the delivery of TSG's key responsibilities as a pan-London unit; as well as detailed analysis on level of demand and resourcing requirements
- Framework Supporting SIAM2 Development (April 2021, Adequate): further clarity is required 1) within the MPS guidance to determine accountability for key decisions and 2) in documented

Programme governance arrangements with regards to the corporate oversight and key accountabilities for decision making.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:

- Further embedding an enhanced business planning processes
- Developing a joined-up digital and data road map to maximise organisational capability and efficiency
- Implementing key systems, in particular CONNECT and Command and Control, to address IT legacy issues
- Developing the organisation's data / information analytical capacity and capability

5- Developing the entity's capacity, including the capability of its leadership and the individuals within it

Assessment of current position and recent progress

We have a strategic objective to "learn from experience, from each other, and constantly strive to improve". As reported through our Governance improvement Plan on Capability, Learning and Development, the delivery of Learning and Development transformation is progressing at pace. Mobilisation for the Learning Target Operating Model (LTOM) is on track for June 2022. The 'Go Live' date for the corporate Learning Management System (LMS) is taking place over the summer. New digital and blended training content is being rolled out. The transformation of the core investigative training (PIP2) delivered by the Crime Academy continues, transitioning from a 'one and done' face-to-face course to a blended learning development programme.

We expanded training in the Public protection area to ensure officers are better equipped:

- Training BCU public protection officers and Harmful Practice Advisors on Protection Orders, to increase their use and improve their management
- Devising pathways to enable reaccreditation for all trained officers against the Specialist Child Abuse Investigation Development Programme (SCAIDP/SAIDP). Re-accreditation for those in suitable roles has been completed.
- Implementing investigation training and working with MASH teams and Children's Social Care to enable investigators to understand the processes (MASH/CAIT referrals / strategy discussions / Local Authority Designated Officer involvement) to safeguard children at the earliest opportunity.
- Reviewing how "Abuse and Neglect of Vulnerable Adults" investigations are allocated to ensure that the officers have the relevant skills and experience. The quality of investigations is tested through the annual quality assurance assessment process.

We also addressed capacity and capability through system improvements, such as:

- Updating our crime recording systems to include mandatory considerations by investigating officers of the vulnerability of an adult victim of crime or to identify those offences where additional vulnerability may exist
- Completing the Labnet networked kiosks in BCUs to enhance officer self-service for digital downloads
- Providing better access to the Child Abuse Image Database (CAID) to Online Child Sexual Abuse and Exploitation (OCSAE) officers to improve investigation capability.
- A new national AI system went live in April 2021 which automatically sends Protection Orders obtained in Family Courts relevant to the Met – making recording more accurate, better safeguarding victims

- Implementing Image Retrieval Units across all four Specialist Crime hubs to ensure the timely retrieval of vital evidence and suspect identification, increasing positive criminal justice outcomes.

Further improvements we need to make

Within the Professionalism command, there is an Organisational Learning and Research function – which is developing an organisational learning environment within the MPS to capture and turn learning into action. The OL function has become established within CPIC, and focuses on four key areas:

- implementing the OL framework
- systemising information, knowledge and memory
- learning from high harm/risk; and
- embedding a culture of learning

In the context of our Governance Improvement Plan on Organisational Learning (OL), there are however a number of slippages on some of these strands, which CPIC attributes to pressures on its resources. This includes the timing of delivery for some of the OL supporting structures in Commands (OL hubs). The team worked with Digital Policing, and other parts of the business to develop Organisational Learning within scoped Met systems. The planned OL app was withdrawn due to cost and complexity. However, full overall implementation is still expected to be complete by Q4 2022/23. The improvement plan will therefore be carried forward to the coming year.

Q6) I am confident that processes to identify the skills and abilities needed in my area of responsibility are effective and that our recruitment, training and learning and development processes deliver the capability and leadership we need.

YES 40%, PARTLY 49%, NO 10%

SUMMARY FINDINGS

- This area receives the lowest levels of confidence from senior leaders. This is related in part to the current market for specialist skills – competitive and in short supply. Whilst these are externalities, Met processes (including vetting) can lack agility and exacerbate the difficulties.
- Frontline Policing, reports a mix of issues for officers: whilst the central recruitment process is recognised as effective, areas of improvement are identified with regards to training and promotion: for sergeant promotion, we are not testing some of the skill set to supervise effectively and do not seek line manager view – the focus on numbers to promote can impact on quality. Secondly, as the officer growth has decreased corporate levels of experience, training has not been reinforced and is assessed as inadequate to help address that relative inexperience.
- Although some units within Met Ops have sound recruitment and training processes, those that depend on specialist staff highlight recruitment difficulties due to length of time and salary constraints, whilst for officers, they also note that the supervisory model needs investment, as well as effective training and leadership skills.
- Although it is acknowledged within Professionalism that there are leadership and training courses available, many responses indicate that this is not sufficient. There is a perceived lack of talent management, and skills.
- Our market engagement, employment offer and processes – in terms of staff recruitment – do not attract the right pool – as noted across Corporate Services and Digital Policing.
- Unlike some other Directorates, the general view in Specialist Ops is that officers and staff have the skills and training required to work effectively. Recruitment can be an issue due to demand elsewhere in the Met, and the diversity of staff needs improving in some specialist units.

HMICFRS' Child Protection report (Sept 2021) reported that some staff within the Public Protection environment are "under significant pressures" with "workloads, staff capability and supply of detectives with the right experience as contributing factors.". HMICFRS observed that the Met is actively seeking to

manage the high workloads and that investment is being made to address capacity issues. However, they cited *“it could do more to use an understanding of good practice and development needs to inform both immediate, and ongoing, staff training. The force also needs to ensure all teams involved in such work are consistent in both approach and method”*.

Through their audit programme, DARA also identified areas of risk, making recommendations around:

- The centralised monitoring and oversight of training and skills for Public Protection officers with consistent recording of information and reliable data (BCU Review Programme - Domestic Abuse, Management and Deployment of Resources including the Investigations Framework; November 21, Adequate).
- A central skills matrix to facilitate a gap analysis to manage future training needs (Programme/Project Management – TD Governance; February 2022, Adequate)
- Clearly defined roles, responsibilities and accountabilities (Met Detention Delivery Framework – Capacity and Capability; May 21, Limited)
- Consistent and accurate completion of a skills database to monitor training compliance and identify skills gaps (TSG Follow up Review on the Use and Deployment of Resources; May 21, improved from Limited to Adequate).

These recommendations echo the feedback from Leaders in terms of a better corporate understanding of skills available, in order to permit a more effective management of resources, as well as targeted provision of training.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:

- Implementing the Learning Management System to provide solid foundations to our learning approach and our management of skilled resources
- New Learning Target Operating Model: the Learning transformation programme will clarify processes, controls and responsibilities
- Moving to a blended curriculum to allow learners to access digital content including on-demand at the point of need.
- Improving our understanding of workforce capabilities and better linking training to identified needs
- Working to address the experience gap through better supervision and continued leadership development
- Through the Engage process, develop an improved mapping of resourcing to demand, building on the Force Management Statement findings and linking to Year 3 growth decisions

6- Managing risks and performance through robust internal control and strong public financial management

Assessment of current position and recent progress

Robust financial grip is in place and improvements continue. The Director of Finance chairs a monthly meeting with relevant directors, considering investment decisions that are due to go to Portfolio and Investment Board and the Investment advisory Meeting. Going forward, we will consider financial management arrangements against CIPFA’s Financial Management Code. The Risk and Assurance Board has sharpened its focus on strategic risks and reviews directors’ response to all Limited audits. The Performance Board and Performance Group manage performance linking operational (with the Performance Framework in place) and enabling functions (reviewing resourcing of OCUs on a regular basis).

The DARA audit on Programme/Project Management and Transformation Directorate Governance (February 2022, Adequate) highlights risk management arrangements in Transformation as an area of effective practice, with key risks regularly reviewed, escalated and reported to stakeholders.

The DARA audit on Risk Management Framework assessed the Met at Risk Maturity (low) Level 3 and suggested a number of improvements that will be taken forward in the year ahead. It also highlighted areas of effective practice: the Risk Management guidance revised in January 2021 clearly outlines approach, management accountabilities, governance and process in line with best practice. It also found Management Board members are committed to effective risk management and improving risk management throughout the Met.

We have strengthened operational risk management across many functions and crime areas:

- Embedding THRIVE+ in Frontline Policing, so as to have a consistent decision-making framework across the Met. THRIVE+ awareness training has been delivered to Street Duties tutors and is part of the new curriculum (PEQF) for all new recruits – so threat, harm and risk is fully integrated in their decision making. However we know more progress is required, as highlighted by HMICFRS.
- Realigning Trident reactive resources to meet geographical and investigative demand of lethal barrel discharges and the recovery of firearms.
- Updating our sexual risk orders (SRO) policy to improve public protection, the supervision of their applications, and risk assessment information for the courts, and to apply management more robustly through Jigsaw teams. This change has been accompanied by an extensive internal awareness campaign to all CID units and more widely.
- Adopting Vulnerability to Radicalisation (V2R) as a defined strand of safeguarding across our Public Protection Framework, and developing force wide delivery of Prevent has been overseen by the Force Prevent Strategic Lead. In order to increase the identification of those vulnerable to radicalisation we have incorporated V2R within vulnerability factors on MERLIN (system recording details of missing persons, children and vulnerable adults) ensuring it is a consideration for officers when completing their assessment.
- Driving performance on wanted offenders, with a focus on high harm offenders. The Violent Crime Task force (VCTF) now holds an Offender Management meeting every two weeks where all BCUs are held to account for their activity that specifically targets wanted high harm offenders.
- In Public Order, we have appointed experienced Public Order Public Safety (POPS) Commanders as Lead Responsible Officers, building in resilience, learning and development opportunities as each has a deputy. We have improved the debrief processes to encompass learning from each event.

Q7) I am confident that risk management arrangements within my area of responsibility, are effective in identifying, assessing, escalating and managing risks.

YES 79%, PARTLY 21%, NO 0%

SUMMARY FINDINGS

- In Frontline Policing, most leaders mentioned that risk forms a regular element of meeting discussions – whilst Met Ops gives a strong, positive self-assessment of its risk maturity and risk management culture. Effective risk processes across Specialist Ops OCUs include partnership sharing, including at national level, as well as reviews of organisational learning. Corporate Services identifies improving governance, good risk management (through meeting structures and risk registers). References are also made to the oversight by the Risk & Assurance Board, positive working relationship with DARA, and the constructive response to the Information Commissioners Office (ICO) recommendations. Risks are also effectively managed across Digital Policing, with processes in place for identification, management and escalation.
- In Professionalism, arrangements are considered generally positive, but risk management could be strengthened through regular reviews and a lack of experience or training.

Q8) I am confident that we have robust assurance structures and effective internal controls within my area of responsibility including financial procedures, management systems and performance reporting.

YES 69%, PARTLY 28%, NO 0%

SUMMARY FINDINGS

- Assurance in areas of Corporate Services and Digital Policing is based on established local structures (PMO office, Health Safety and Wellbeing Board etc.), corporate boards (Risk & Assurance), embedded controls and reporting mechanisms (such as project reviews). Frontline Policing, Met Ops and Professionalism leaders also assess structures as effective with a good level of control, good support from corporate services and generally sufficient oversight. Specialist Ops report clear lines of oversight regarding financial and performance reporting.
- Leaders find the information packs produced (finance or performance) useful, but some still report challenges and more work still required, such as in terms of access to data, local performance dashboards, or in terms of enhanced analysis of financial spend that could provide more insight.
- One issue raised under this section concerns the lack of capacity to conduct regular proactive assurance activity (in this context linked to data protection or processing) which might be applicable to other areas).

Q9) I am confident that financial management within my area of responsibility is effective; that officers and staff understand and comply with financial processes (including the MOPAC Scheme of Delegation and the Met financial instructions); that our decision-making delivers value for money; and that suspected cases of fraud or financial impropriety are referred to Finance, DARA and Professional Standards.

YES 72%, PARTLY 28%, NO 0%

SUMMARY FINDINGS

- Leaders highlight effective financial processes in place in Corporate Services and Digital Policing, compliance with the scheme of delegation, regular reviews, discussions at meetings, support from Finance business partners and monthly SLT oversight. Frontline Policing also report generally good controls in place, and financial processes are discussed at SLT meetings, supported by good relationship with the central Finance team. Met Ops and Specialist Ops report confidence in the way in which financial processes are handled, and commercial services relationship. DARA audits and recommendations are acted upon, and MOPAC's scheme of delegation followed. Professionalism assesses that good processes in place to ensure requirements are met, reports of financial impropriety are investigated and there is a clear understanding of processes and oversight.
- Given much of the budget is spent on people, areas for improvement highlighted are around the resource liability management of rest days and annual leave; as well as overtime overspend in some areas.

Further improvements we need to make

In the context of our current Governance Improvement Plan on Assurance Controls, Level 1 and 2, we made progress on a number of fronts:

- The review of Public Protection policies has taken place.
- The Data Quality Ethics Assurance Board (DQEAB) is in place and helps BCUs in completing their Level 1 inspections. Initially focused on Public Protection, it has been expanded to include reviews of the usage of *Released under Investigation*, and *Outcome 16* (victim withdrawing support for investigation).

A number of actions will be carried forward to next year, including the embedding of Level 2 Assurance capability within CPIC – and the further deployment of a continuous improvement approach across BCUs as part of Operation Aegis (Public protection).

Q10) I am satisfied that data is managed robustly within my area of responsibility (both in terms of quality and compliance), and that my officers and staff know and comply with statutory obligations.

YES 46%, PARTLY 46%, NO 8%

SUMMARY FINDINGS

- Leaders highlight the significant improvements that have taken place in that area (e.g. to update data agreements, carry out Data Protection Impact Assessments, steer progress through Data Board and Data Assurance Gold Group, and to educate staff) as well as the need for more work to ensure that data management, responsibilities, and practices are understood by all.
- In Frontline Policing, leaders acknowledge there is more to do in terms of how data is used and shared. Across business groups, it is noted that Data quality entry also needs to improve, particularly ahead of the Connect implementation. More training and supervision could assist. In Specialist Ops, there is robust compliance and understanding of data responsibilities, but there are legacy challenges (in common with other parts of the Met, for example the CARMS (Computer Aided Resource Management) replacement delay in Public Order, or more widely the issue of data retention).
- Corporate Services and Digital Policing, in addition to the dedicated Data Office capability, highlight local governance and practices in place to manage the use and quality of data.

The DARA audit on Information Management – Data Quality including Workforce Data (May 2021, Limited) highlights areas for improvement consistent with some senior leaders’ responses above:

- The importance of data quality is not clearly understood for a large number of officers and staff, and there is a need to educate, change behaviours and instil the principle of “right first time” and personal responsibility for data to build good data foundations.
- Assurance over data resource is intensive and relies on monthly downloads of data that cannot be re-run once data quality amendments are made, leading to mistrust in the data.
- There is a need to improve metrics, KPIs and data reporting standards. An Advanced Analytics Strategy is in place, which will help improve strategic outcomes.

In March 2022, HMICFRS published their report entitled “An inspection of the Metropolitan Police Service’s counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel”. Two recommendations to this governance improvement area whereby an improved system of digital device management must be adopted with clear expectations for compliance.

The DARA audit on the Framework Supporting SIAM2 Development (Adequate) reinforced the need to follow MOPAC Contract Regulations in all cases, i.e. formal approval for route to market.

The DARA follow-up review on Financial Assurance Programme – Police Overtime (May 21) improved from Limited to Adequate. It saw a number of improvements, such as the Monthly Gold Group and an action plan created to deal with issues and monitor progress; the updated CARMS policy; Frontline OCUs overtime action plans focusing on areas requiring closer scrutiny; and the monthly reports on budget position provided to OCUs. However it also highlighted the need for:

- a clear and consistent strategic approach to policy refresh in key areas taking account of changes resulting from the move to PSOP
- Clarity and consistency within systems to monitor negative time-off and/or unelected overtime
- A System to allow consistency of interpretation within individual OCU action plans, and to ensure sufficient resourcing is in place to implement and monitor them and
- A continued review of police overtime risk profile to allow early identification of emerging risks and facilitate prompt mitigating actions.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:

- Embedding a Level 2 Assurance capability within CPIC in support of the Heads of Profession, with the support of DARA
- Implementing BCU/OCU Organisational Learning Hubs
- Finalising the review of corporate Policies
- Improving compliance and understanding of data responsibilities across the organisation
- Embedding of Level 2 Assurance capability within CPIC and with the support of DARA
- Training key contacts in business groups to strengthen risk maturity
- Improving functions' management of corporate risks and raising risk maturity in the functions where it is lower.
- Consider financial management arrangements against CIPFA's Financial Management Code

7- Implementing good practices in transparency, reporting, and audit to deliver effective accountability

Assessment of current position and recent progress

Q11) I am confident my unit is implementing good practice in terms of transparency, reporting and accountability, providing assurance to our SLT, to Management Board and to stakeholders that our actions are effective, and that our intended outcomes are being achieved.

YES 85%, PARTLY 15%, NO 0%

SUMMARY FINDINGS

- Frontline Policing and Met Ops report processes are in place, through local and central governance (such as FLEX meetings, as well as national, for example in the case of Specialist Ops) providing a good grip and supporting a strong reporting culture. A number of recent improvements are highlighted by leaders, such as the development of local performance frameworks and improvement plans.
- Corporate Services report good oversight provided at various levels (internal boards, PIB, MOPAC). As for Digital Policing, a structure of governance and processes exists to monitor performance and outcomes. Key performance data and information is published on the internet. Reporting for significant issues to management board is in place (e.g. critical IT issues).
- Two areas of future improvements are noted: the lack of data in some areas of service provision, as well as a lack of clarity as to how organisational learning is embedded so it is as effective as we might want

Q12) I am satisfied that audit and inspection reviews in my area of responsibility, whether from HMICFRS, DARA or external auditors, are constructively supported and that recommendations are effectively implemented.

YES 82%, PARTLY 18%, NO 0%

SUMMARY FINDINGS

- Frontline Policing, Met Ops, Specialist Operations and Corporate Services leaders find audits and inspection are welcomed and well supported. There is good – and improving - engagement from teams. Recommendations are followed through and action plans acted upon. Actions regularly reviewed at relevant SLT and boards meetings. This also relates to Professionalism in terms of other inspecting bodies such as IOPC and coronial reports.
- Frontline suggests that more account needs to be taken of the impact of recommendations on resources and their implications / linkages across other areas – which ought to be a consideration for the auditor and at corporate level.
- Digital Policing raises an IT capability gap within the internal audit function that would help take account of Met systems design and enable the development of a stronger set of risk controls.

The MPS carries out some in-house assurance activity to ensure that policy, process and legislative requirements are being met in distinct areas such as through Continuous Policing Improvement Command (CPIC), Met Detention, Met Intel and Forensics.

We also worked to raise commercial awareness through a series of sessions (around procurement and assurance practices in particular) held in 2021 with interactive presentations provided by the Directors of Finance and Commercial Services. These are part of a wider developing approach to Corporate Services working closely with business groups to continually improve the benefits and requirements for audit and assurance processes.

In terms of HMICFRS inspections, all recommendations and Areas for Improvement (AFI) emanating from HMICFRS reports are collated onto a central tracker. Each report is assigned a Met lead (based on who was the lead during the inspection or, if a thematic report for which the MPS was not involved in, the most appropriate senior lead) and Strategy and Governance prepare an initial action plan for the Met Lead to review. They then assign recommendation or AFI owners (named individuals) and detail the key actions that will be taken to address the recommendation or AFI. The action plan is shared with MOPAC within a set timeframe. Included within the action plan is the governance route; progress against each recommendation or AFI is through this governance route. Recommendation / AFI owners provide quarterly updates and the central tracker is updated along with HMICFRS's Monitoring Portal.

We have increased levels of transparency, for example by [implementing the Stride commitment to provide our responses to key inclusion, diversity and engagement recommendations](#).

For internal audit, high risk actions are tracked by Strategy and Governance and reported to Risk and assurance Board and Audit panel. Outstanding audit actions are reviewed at Met Ops COG and FLP risk board and outstanding actions for each area are sent to the relevant senior leader on a quarterly basis. Strengthening the pace of implementation of DARA internal audit recommendations was an objective in last year's AGS. Over the past year, the number of outstanding actions has decreased, complemented with an organisational drive to tackle any older actions.

Further improvements we need to make

The DARA audit on BCU Review Programme (Domestic Abuse, Management and Deployment of Resources incl. Investigations Framework) from November 21 rated the area as Adequate but noted the need for clarification of governance arrangements, particularly around remits, responsibilities and reporting lines, and this will be followed-up.

Finally, we have initiated work on an Open Data Strategy, which will broaden what Londoners and our partners can access directly. This is expected to be published in 2022/23.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:

- Embedding a Level 1 Data Quality Ethics Assurance process.
- Ensuring all Commercial Contracts where data processing is required are DPA (2018) compliant
- Developing an Open Data Strategy and working to make more information available
- Implementing the Organisational Learning model and a clear framework on how learning from audits, inquiries and recommendations is shared organisationally

Governance Improvement Plans

Evidence from our 2021/22 review of the Met's internal control environment suggests that we made progress against our governance improvement plans but we acknowledge more is required, as highlighted in each section of this document under "Areas in which we will pursue improvement in 2022/23". Progress on these actions will be reported quarterly internally and to Audit Panel.

Declaration

We propose over the coming year to take steps to address the matters raised in this document to further enhance our governance arrangements, focusing most effort in the highlighted areas. We are satisfied that these steps will ensure that Met governance processes will remain effective in a changing environment. We will continue to monitor their implementation and operation, including through risk management and assurance processes.

Mark Rowley
Commissioner of Police of the Metropolis

Roisha Hughes
Acting Chief of Corporate Services

Appendix: background and governance framework.

Scope of responsibilities

The Commissioner of Police of the Metropolis is responsible for maintaining the Queen's peace and has direction and control over officers and staff operating within the Metropolitan Police Service. The Commissioner is responsible for the overall governance of the Met, and so for establishing and maintaining appropriate governance arrangements and risk management processes, and for ensuring that there is a sound system of internal control which facilitates the effective exercise of these functions. The Commissioner is required to appoint a professionally qualified Chief Financial Officer (CFO) for the Met. Under the Police Reform and Social Responsibility Act 2011 the CFO has a personal fiduciary duty for the proper financial administration of the Met. As an independent legal entity or corporation sole, the Commissioner is also required to produce an Annual Governance Statement.

Met objectives and operating environment

The Met's mission is to keep London safe for everyone. The Deputy Mayor for Policing and Crime holds the Met to account against the [Mayor's Police and Crime Plan](#). The Met sets out how these priorities are delivered in partnership with stakeholders, through the [Met Direction](#) – its strategy to 2025 - and through its [Business Plan and a quarterly performance monitoring process](#). The Mayor's Office for Policing and Crime (MOPAC) holds the Commissioner to account for efficient and effective policing, management of resources and expenditure.

The Met Direction set out three operational priorities:

- To focus on what matters most to Londoners;
- To mobilise partners and the public; and
- To achieve the best outcomes in the pursuit of justice and in support of victims.

Supporting this, four enabling priorities set out how the organisation aims to develop its internal capabilities to ensure it is operationally effective and efficient:

- To seize the opportunities of data and digital tech to become a world leader in policing;
- To care for each other, work as a team, and be an attractive place to work;
- To learn from experience, from others, and constantly strive to improve; and
- To be recognised as a responsible, exemplary and ethical organisation.

The Met priorities are delivered through a workforce of over 46,374, including 33,566 police officers, 1,848 MSC, 9,807 staff and 1,152 PCSOs organised in four operational Business Groups: Frontline Policing, Met Operations, Specialist Operations and Professionalism. In addition Corporate Services enables the Met through strategy and governance, people, transformation, finance, commercial services, property, legal, and media and communication. Digital Policing supports the Met information, communications and technology needs.

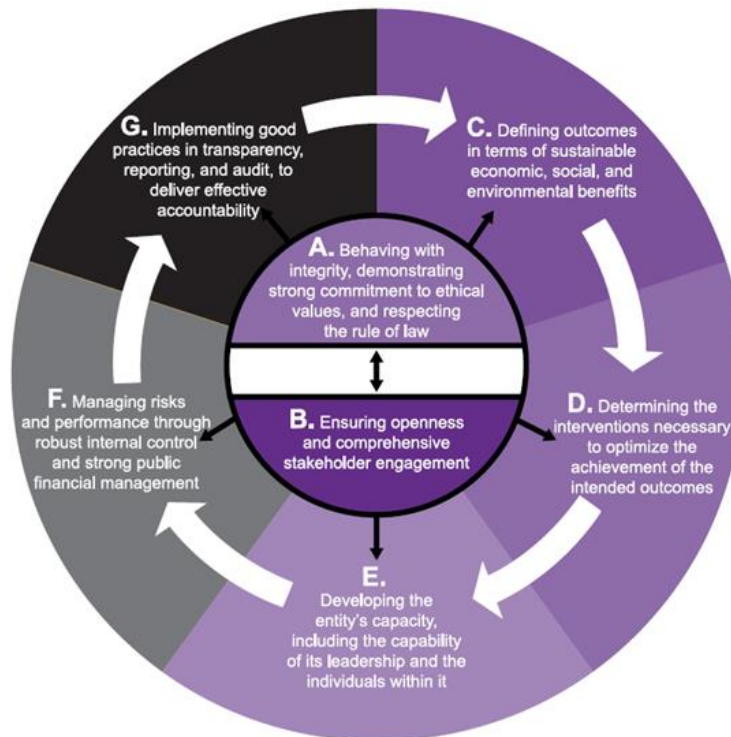
The Governance Framework

The Met has developed its governance model in accordance with the CIPFA/ International Federation of Accountants (IFAC) International Framework for Good Governance in the Public Sector (July 2014) and subsequent CIPFA/SOLACE Delivering Good Governance in Local Government Framework (April 2016) and Guidance for Policing Bodies in England and Wales (July 2016). This AGS explains how the

Commissioner of Police of the Metropolis has complied with the Code for the financial year 2020/21 and meets the requirements of section 6 of the Accounts and Audit Regulations (England and Wales) 2015 in relation to the publication of a statement on internal control. In adopting this framework the Met accepts that:

- Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.
- The fundamental function of good governance in the public sector is to ensure that entities achieve their intended outcomes while acting in the public interest at all times.

In developing this AGS, the CIPFA principles have guided the structure – the seven elements are used to structure this document.



The Met is statutorily responsible for conducting, at least annually, a review of the effectiveness of its system of internal control and so, of its governance framework and compliance with its Code. This takes place between January and May when governance areas are explored with senior leaders and evidence is analysed from a broad body of relevant sources. This includes: Senior Leaders Assessments of Internal Control; Internal and External Audit and Inspection including opinion; and Risk and Assurance activity. In addition this review of the Met's internal control environment has been informed by our Corporate Risk Register which details key business risks and controls. We have considered audit and inspection including by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), our external auditor Grant Thornton LLP, and our internal auditor the Directorate of Audit Risk and Assurance (DARA).