

M O P A CMAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL

3 October 2022

Met Audit & Inspection Report

Report by: Director of Strategy & Governance

Non-restricted paper

Report Summary

This report provides Audit Panel:

- responses to the actions from the last meeting, and
- a summary position of DARA and HMICFRS activity and engagement over the last quarter.

In relation to DARA audits, since last quarter's report to Panel, the Met has received 10 **new actions** from one audit and two follow-up audits that met the monitoring threshold. During the same period, 21 **actions were implemented** and are now proposed as closed.

In July 2022, HMICFRS moved the Met into the Engage phase of monitoring. The process for Engage and what the Met should expect whilst still in Engage, is outlined in this report.

The Commissioner's new Turnaround Board which will help build a broad alliance to drive improvement and change in the MPS, and support the development of the Met's new strategy, is also referenced.

Publication of the PEEL assessment report has been delayed by HMICFRS until 22 September 2022.

Key Considerations for the Panel

The Panel is asked to note the continued progress in reducing outstanding actions, and in particular to note the improvements made to the number of 'open' HMICFRS recommendations since October 2021.

Interdependencies/Cross Cutting Issues

By the very nature of the audit and inspection regime, there are considerable cross-cutting elements across the Met.

Recommendation

- To review the responses to Audit Panel queries
- To note the progress being made to track and monitor audit actions and HMICFRS recommendations and areas for improvement

1 Risk and Assurance Board update

Risk and Assurance Board met on 1 September 2022 where they discussed HMICFRS's decision to move the Met into the Engage phase of monitoring and the Met's response; they also reviewed progress against outstanding audit actions.

2 Actions from Audit Panel

The panel had asked the following questions.

2a- What action is being taken to address the underlying themes arising from review activity highlighted in the report?

The most common themes across outstanding actions (34 at the time of Audit Panel's query) were:

- Assurance (32%)
- Management Oversight and Reporting (24%)
- Accountability (15%)
- Capability and Capacity (15%)

The risk themes were broken down into business areas and shared with audit owners. We analysed all monitored actions (delivered and outstanding) from all audits since 2019/20 to identify the underlying risk themes from the audit findings. We circulated key risks from each of the top three areas (notable because they feature more than once in the audit findings with more than one action to address the risk) to the business, asking them to consider the areas where they hold more risk and ensure the controls introduced/adapted to deliver the audit actions and prevent the risk from materialising are still in place and effective. If an element of risk remains, to confirm that these are captured on risk registers so the risk is reviewed and managed through a more formal process. In addition, within Corporate Services, owners of delivered actions that directly relate to corporate risks are now asked to provide an update 6 months after closure detailing how they know that the process/ solution (control) put in place is fit for purpose and still working.

There have been key successes in action being taken to address the underlying themes arising from review activity, for example from the *MPS Counter Fraud Arrangements* follow-up audit, the whistleblowing policy has replaced the Raising Concerns policy. The fraud "risk wheel" has been reviewed and a review of the risks for each component is now "business as usual" for the command. Centurion is now used as the single reporting domain for all allegations of fraud. The content of the e-learning package has been fully reviewed and approved to be moved to LinkedIn Learning.

Strategy and Governance will continue to reinforce that message: the Internal Audit Annual report 2021/22 presented by DARA at the September Risk and Assurance board details the auditor's assessment of key themes arising from review activity during the year. We will work with all areas of the business to ensure action is taken to improve governance and effectiveness where necessary across the internal control environment for these highlighted areas.

Assurance (the most common theme): from a corporate assurance perspective within the Level 2 environment the core practice teams in the Continuous Policing Improvement Command (CPIC), which lead best practice, policy and improvement within their thematic areas such as Public Protection, are developing more active assurance intervention across the MPS. Level 2 assurance activity is already integral to the Organisational Learning & Research Centre of Expertise, and in the Continuous Improvement & Policy Centre of Expertise. The Heads of Profession are also able to commission Level 2 assurance activity from CPIC.

A comprehensive approach has been developed that incorporates all known Level 1 and level 2 activities and seeks to embed Continuous Improvement (CI) within each. Initially focussed on Public Protection, it will expand into the other BCU strands. The strategy is aimed at building on foundations set by Operation Aegis and will help to ensure early benefits are realised and continue to be delivered. Support, coaching and training is being provided to recently formed Continuous Improvement and Organisational Learning teams, established on EA and AS BCUs utilising existing budget and vacancies. Infrastructure and governance structures have been established that complement and align with BCU current practices and operating model. This includes the forming of a combined CI and OL board.

To ensure a greater join up with the Annual Governance Statement, we have now aligned the risk themes to the CIPFA principles of good governance allowing us to clearly identify the key areas that need to be improved and ensure the plans reflect the risk areas identified. We have also applied key Organisational learning themes to outstanding DARA actions as well as HMICRS recommendations to provide greater join up across these areas.

As per a separate note to the Audit Panel, a wider assurance mapping exercise will also be taking place across the MPS.

2b- Information on the governance boards, what they oversee and how they work together and are co-ordinated.

The local governance boards or meetings overseeing the implementation of currently live recommendations are as follows:

Governance route	Number of Recommendations
Counter Corruption Learning Group	23
Public Protection Board and Public Protection Delivery Board	22
IOM Governance Board	4
Learning & Development HQ meeting	2
Victim Care Board	2
Use of Force Oversight Board	2
Custody Transformation Board	2
Economic Crime Performance and Tasking meeting	1
Stop & Search Gold Group	1
Public Order Strategic Board	1
Rape London Partnership	1
Supply & Demand Board	1

Where substantial progress is required in an area (through inspections, audits, internal oversight and performance monitoring), a new structure may take forward all recommendations in that area. These are time-limited, task-and-finish structures that bring together the parts of the organisation that can effect this implementation. For example, the Public Protection Delivery Board holds one third of live HMICFRS recommendations related to vulnerability and the Public Protection Board provides oversight. Another example, the Counter Corruption Learning Group is responsible for the active delivery of recommendations identified in the “Counter corruption and other matters related to the Daniel Morgan Independent Panel” report and Risk and Assurance Board provides the oversight. It is expected that Engage will follow that model.

Where the number of recommendations from an inspection does not warrant a new governance structure, local existing boards or meetings may be used as local delivery tools to strengthen governance. They provide them with senior support to help them access the right levers if needed.

Once their task is done, boards or meetings set up specifically to address causes of concern, recommendations or areas for improvement in an area are stood down, and a closing statement with evidence is tabled with the Force Liaison Lead at HMICFRS to review.

However whilst these local or pan-Met boards drive implementation, the responsibility and accountability for any single recommendation sits with the named senior leader. Corporate governance for all HMICFRS recommendations sits with the Risk and Assurance Board, which oversees progress against all HMICFRS recommendations / AFIs and receives quarterly updates, collated through a working lead in Strategy and Governance (Planning and Risk team).

3 Internal Audit update

Performance progress on Internal Audit metrics

The corporate performance framework 2022/23 contains the below audit metrics monitored under pillar 6: ‘Pillar 6 Learn from Experience’. Q2 position shows good progress:

- 1) Implement 90% of our high-risk audit recommendations within the deadline (FY 2022/23).
 - Q1 2022/23 = 80%
 - Q2 2022/23 = 100%

- 2) Increase the percentage of audits rated adequate or above. (Improve from the baseline - 64%).
 - Q1 2022/23 = 100%
 - Q2 2022/23 = 100%

NB – figures are sourced from the audit plan tracker and therefore may not capture restricted audits, will not include advisory work and will be based on audits received at point of reporting.

To assist business areas with completing their actions on time, Strategy and Governance review all outstanding audit actions with Chief Officers at their formal risk meetings. Business area leads are emailed one month before actions are due to ensure they are aware of approaching deadlines and are asked to inform us when any actions have been addressed. All areas of the business are actively encouraged, where appropriate, to ensure the risks highlighted are managed as part of their local risk management practices and included in their risk registers.

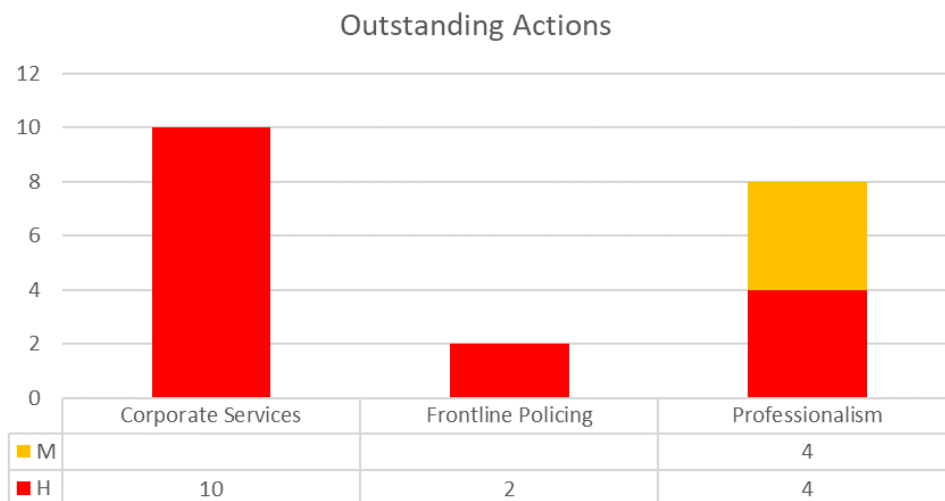
We have drafted a guidance document to assist leaders in ensuring that appropriate timescales are set, future actions are clear and that owners fully understand what needs to be undertaken to deliver the agreed activity and address the risk.

Internal Audit Progress update

Since last quarter’s report, the Met has 10 **new actions** from one audit and two follow-up audits that met the monitoring threshold. During the same period, 21 **actions were implemented** and are now proposed as closed. The total number of outstanding actions is now 20 (16 High priority).

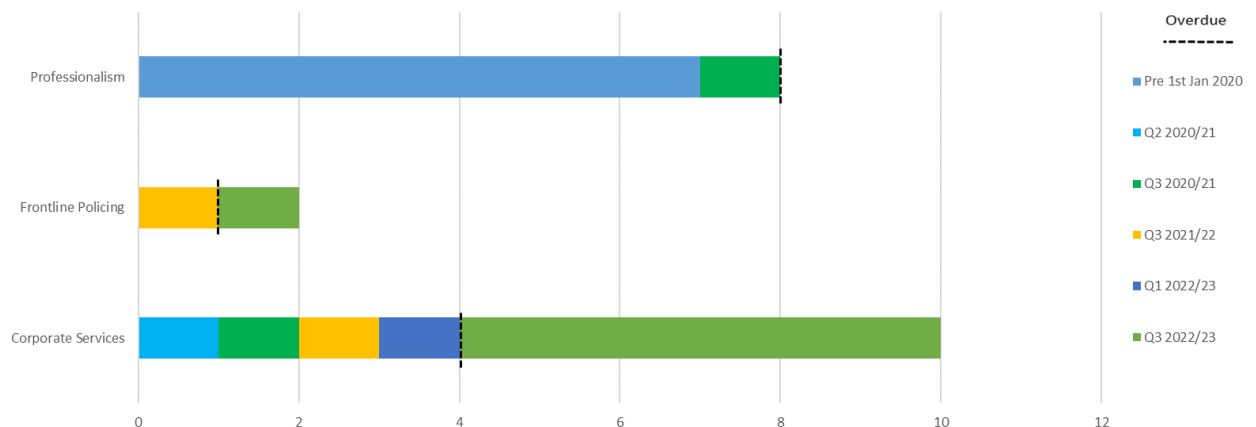
Specifically, we have seen progress with the training-related actions which form part of the Learning and Development Transformation programme. Six actions have now been implemented. The LMS and LTOM both went live on the 22nd August 2022, and Curriculum Modernisation 'go live' scheduled for early 2023.

The outstanding actions pertain to 9 audits.



There continues to be considerable effort to reduce the number of outstanding actions across the business following more robust management oversight and closer monitoring in this area to deliver on the actions. Met Operations are shown as having no actions, however some remain in relation to the *Covert Fixed Assets Limited Audit* issued in June 2022 (not monitored due to the sensitivity of the subject area). A paper was presented at Risk and Assurance board to provide an update on progress already made and details of actions going forward to address the risk.

Open actions by business group and Quarter due delivery date:



Actions to the right of the dotted line are within the quarter due date, those on the left are past the original due date.

All of Professionalisms actions are overdue, however 7 of the 8 are linked to training and will be addressed as part of the Transformation programme. The remaining action from the *Security Clearance & Vetting - Effectiveness & Efficiency (Follow Up)* is in relation to the Vetting sponsor portal. This is a phased implementation which has been designed to include learning and Impact assessment through each phase as well as working with stakeholders to agree training and mitigate risk. This action has a revised deadline of November 2022.

Frontline Policing has one action overdue from the *Framework Supporting Management of Notifications on Missing Person and Linked Indices (MERLIN)* follow up audit. The Demand and Resource Modelling Task & Finish Group have made significant progress in reviewing open cases. Next steps will be the Adult and Children Task & Finish groups reviewing the recommendations with an expected completion date of January 2023

Corporate Services reduced their outstanding actions to four last quarter. Three are from the *Framework Supporting Data Protection Compliance*, however the “Year of Data Quality” programme will address these outstanding actions. The remaining 6 actions are due by December 2022.

Delays in meeting due dates

As agreed with DARA, we actively encourage action owners to provide expected completion dates for outstanding actions past their due date, so we focus less on what we didn’t manage to achieve and provide a renewed focus on achieving the revised due dates. Of the 13 overdue (down from 33 last reporting quarter), 11 have anticipated completion dates. These are highlighted to action owners as part of the information reviewed in risk and audit governance meetings.

When looking at the delays for the current actions, the main reason is dependency on another review, either internal or external (or a wider transformation programme). For example, one high risk action from the *Environment & Sustainability Management (Impact of Investment Decisions on the Environment)* follow up, relating to updating

and publishing the MPS Sustainability Strategy is delayed pending an update to the GLA's London Environment Strategy (LES) and further clarification on the MPS's NZC 2030 programme ambition. The MPS strategy is likely to be published early 2023/24.

The new Audit Guide for senior leaders should assist with setting realistic dates. The guide actively encourages discussion with the auditors at both the terms of reference and first draft report stage which should include informing them of pending changes to the business environment (such as links to other reviews) which may affect the scope or timing of the audit or the ability to achieve the actions within the proposed timescales.

Key Audit Themes

We have now aligned the risk themes to the CIPFA Principles of good governance to closer align the audit findings with the Annual Governance Plan. The two most frequent themes for current outstanding risks are *Developing the organisation's capacity including the capability of its leadership and staff* and *Managing the risks and performance through robust internal control and strong public financial management*.

We have circulated DARA key themes arising from review activity document included in the Internal Audit Annual Report 2021/22 to risk leads and will present this at risk boards to ensure they are using these key risk themes as part of their risk identification practices and to ensure they have robust (and tried and tested) controls in these areas. Strategy and Governance will work with the business at a local level to identify where activities or improvements to existing processes can minimise risk and improve controls in these areas.

New Audits received by Strategy & Governance since last meeting

Since the last Audit Panel meeting, Strategy and Governance have received the findings from the audits listed below.

- **Follow Up** – Data Quality Framework (graded adequate)
- **Follow Up** – Environment & Sustainability Management - Impact of Investment Decisions on the Environment (graded adequate)

The following audits have also been received. Where applicable, progress on activity to address these actions will be sought in the next quarterly update.

- **Audit** - Predatory Offender Units (graded adequate)
- **Audit** - Fixed Asset Management System (graded adequate) – *no centrally monitored actions*

4 HMICFRS update

Overview

Since the last report to Audit Panel, HMICFRS has moved the Met from Scan monitoring (which is the default monitoring position for forces) into the Engage phase of monitoring.

Engage phase – the process

A force is moved into the Engage phase when force monitoring has revealed there are problems, if it is not responding to a cause of concern, or if it is not succeeding in managing, mitigating or eradicating the cause of concern. The focus of the Engage phase is to provide advice and assistance to the force in finding ways to improve and resolve the established cause(s) of concern where it has not been successful in doing so by itself.

The Policing Performance Oversight Group (PPOG) provides a forum in which other interested parties – such as the College of Policing, the NPCC, the Association of Police and Crime Commissioners (APCC) and the Home Office – participate in the provision of that help. The scrutiny and oversight of progress for forces in Engage is through the local policing body, therefore we can expect more MOPAC scrutiny whilst we are in this phase.

The PPOG is convened every quarter and is chaired by HMCIC. When a force is moved to the Engage phase, it is considered at the next PPOG. The Commissioner is required to attend the PPOG in mid-October to present the improvement plan, which will form part of his 100-day plan. Management Board will provide robust governance over the improvement plan, which will be Deputy Commissioner / Senior leader-led.

The support provided by PPOG will be amplified by the Commissioner's new Turnaround Board, the purpose of which is to bring the expertise, support and challenge of external stakeholders to help the organisation to drive improvement and change within the MPS. The Board, which has a reforming agenda, will help us make rapid progress. The inaugural meeting was held on 20th September, with members from Audit Panel, NPCC, MOPAC, IOPC, HMICFRS and other key organisations.

Moving from Engage back to Scan

A force does not need to be 'good' in everything to move back to Scan. The Commissioner and MOPAC will be invited to subsequent meetings of PPOG and will be asked to provide progress updates. When the HMI is satisfied that sufficient improvement has been made this will be discussed at PPOG, and the HMIs may then decide to move the force from the Engage phase to the Scan phase.

We are aware that five other forces are currently in Engage, these are, Cleveland, GMP, Wiltshire, Staffordshire and Gloucestershire. It is possible there will be more before the end of this PEEL cycle, therefore wider policing issues may also be in play.

PEEL assessment

Publication of the final report was moved from August 2022 to 22 September 2022, due to HMICFRS scheduling issues.

At the time of writing, there are no forthcoming thematic inspections in preparation, the first time in two years.

Previous inspections

An assessment of current vetting and counter-corruption capacity and capability in policing across England & Wales – to include forces' ability to detect and deal with misogynistic and predatory behaviour

Publication of this report is delayed and is now expected in mid-October.

Serious Organised Crime (lead DAC McNulty)

This inspection took place 11 – 22 July across the operational hubs and 3 BCUs (Central East, Central South and North Area). All fieldwork has now concluded and we await the draft report.

Death Investigation – MOPAC Commission (lead Cmdr Jon Savell)

The Deputy Mayor for Policing and Crime commissioned this inspection following East London Coronial inquests into the deaths of Anthony Walgate, Gabriel Kovari, Daniel Whitworth and Jack Taylor at the hands of Stephen Port. Fieldwork in four BCUs (East Area, Central South, Central East and North West) and two Homicide Teams (Barking and Putney) for this inspection has now concluded. The inspection team are now considering the evidence gathered to draft their report; there is no indication as to when we will receive this.

Serious Youth Violence (lead Cmdr Rachel Williams)

The revised publication date for this report is now October 2022.

Recommendation monitoring

We have previously reported to Audit Panel the work happening to clear the Met tracker and HMICFRS monitoring portal of implemented recommendations. Understandably, HMICFRS were reluctant to close any recommendations until the PEEL assessment concluded; they are now working through the Monitoring Portal to close recommendations where they are satisfied they are addressed or ones that are superseded by new recommendations or areas for improvement.

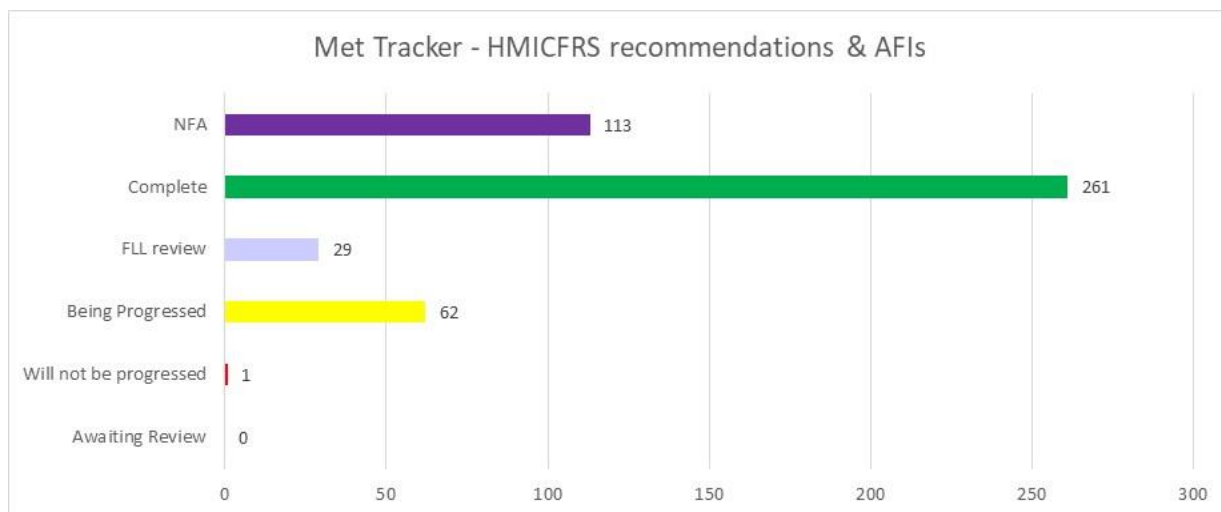
In addition to this, and in support of the improvement plan for the Engage process, we have conducted a deep-dive into all recommendations on the Monitoring Portal to ascertain the current position.

At the time of writing:

- 62 recommendations are still being progressed – meaningful updates received for all and the HMICFRS Monitoring Portal updated
- 47 recommendations are for 'FLL review' for HMICFRS to consider closing.

Our HMICFRS Force Liaison Lead has confirmed that only those recommendations on the Monitoring Portal are tracked by HMICFRS. As a result, we have refreshed the Met Tracker and removed those no longer required – this is with the exception of recommendations emanating from Super-Complaints, whose implementation we will continue to monitor.

The graph below provides a breakdown of different categories in relation to all recommendations / AFIs status as they appear on the Met tracker (including those that are National recommendations i.e. not for forces to address or where HMICFRS has assessed that no additional activity is required on nationwide recommendations – shown as NFA below).



This is a significantly improved position compared to October 2021.

Status	2021	2022	Change
Being Progressed	92	62	-30 = 32.5% reduction
Complete	213	261	+48 = 22.5% increase
Awaiting Review (by Met Lead)	19	0	-19 = 100% reduction
FLL Review	86	29	-57 = 66% reduction
NFA	138	113	-25 = 18% reduction

The table below is a breakdown of the 62 recommendations “Being Progressed”

Year	Number outstanding	Inspection Report	Met specific or National Thematic
2015/16	4	National Child Protection Inspection	Met specific
2018/19	1	National Child Protection Inspection – revisit	Met specific
2019/20	4	Integrated Offender Management	National thematic
	5	Disproportionate use of police powers - A spotlight on stop and search and the use of force	National thematic
	2	The poor relation: The police and CPS response to crimes against older people	National thematic

			(includes one national Cause of concern)
	1	Pre-charge bail and released under investigation: striking a balance	National thematic
	2	National Child Protection Inspections 2019	National thematic
2020/21	1	Spotlight report A review of Fraud: Time to Choose - A revisit of the 2018 fraud inspection to assess progress of the recommendations and areas for improvement	National thematic
	1	Getting the balance right? - An inspection of how effectively the police deal with protests	National thematic
2021/22	4	Final report – Police response to violence against women and girls	National thematic
	1	Review of policing domestic abuse during the pandemic	National thematic
	1	A Joint thematic inspection of the criminal justice journey for individuals with mental health needs and disorder	National thematic
	3	A joint thematic inspection of the police and Crown Prosecution Service's response to rape Phase one: From report to police or CPS decision to take no further action	National thematic
	3	A joint thematic inspection of the police and Crown Prosecution Service's response to rape - Phase two: Exploring rape survivors' experiences of the police and other criminal justice agencies	National thematic
	25	An inspection of the Metropolitan Police Service's counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel	Met specific
	4	Twenty years on, is MAPPA achieving its objectives? A joint thematic inspection of Multi-Agency Public Protection Arrangements	National thematic
TOTAL	62		

Work to address these recommendations (and any new ones identified from the publication of new inspection reports including PEEL) continues; the Met's response to Engage will include a concerted drive to address all outstanding recommendations.

4 Equality and Diversity Impact

This paper outlines HMICFRS inspection activity and DARA audits. Any significant programmes of work undertaken to implement recommendations will be subject to equality impact assessment.

5 Financial Implications

There are no direct financial implications arising from this report. Any additional financial implications from the findings of audits and inspections will be subject to normal investment processes.

6 Legal Implications

There are no direct legal implications arising from this report.

7 Risk Implications

Inspections can highlight significant corporate risks. These are analysed by the Planning and Risk Team and included in the Met's risk management framework where applicable. This paper has no direct health and safety implications.

8 Contact Details

Report authors: Tracy Rylance and Rosiân Jones, Planning, Risk and Assurance, Strategy & Governance