

MOPACMAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL

19 June 2019

MOPAC Annual Governance Statement 2018/19 and Improvement Plan Update

Report by: The Director of Strategy, MOPAC

Report Summary

Overall Summary of the Purpose of the Report

This report is presented to Audit Panel to provide an overview of MOPAC's approach to governance going forward, outline the key areas of improvement and the actions in place to address them.

MOPAC Annual Governance Statement 18/19

The 2018/19 Annual Governance Statement (AGS) at Appendix A, sets out the framework, processes and procedures in place to enable the Mayor's Office for Policing and Crime (MOPAC) to carry out its functions effectively whilst ensuring the organisation continues to achieve value for money.

Governance Improvement Plan 2018/19

The Governance Improvement Plan is a live improvement plan bringing together the improvements identified in the AGS 17/18 with those carried forward from the Governance Improvement Plan 2017/18 (last year).

This report provides a year-end review on MOPAC's Governance Improvement Plan, showing completed actions and those that will carry forward into the 2019-20 plan. The full Governance Improvement Plan is included at Appendix B.

For consideration at the September panel, the Governance Improvement Plan will take account of the latest AGS improvement actions (18/19), the carried forward actions from the Governance Improvement Plan 18/19 and current DARA audit recommendations.

Key Considerations for the Panel

It is requested that the panel reviews the Annual Governance Statement, Governance Improvement Plan review and notes the progress made.

Within the Governance Improvement Plan, there are seven work-streams where delivery dates have slipped. MOPAC does not, however, believe there is significant risk in any of these.

There are four new improvement actions from the GDPR business planning report.

Interdependencies/Cross Cutting Issues

Governance is a MOPAC/MPS aligned risk. This is discussed elsewhere on the Audit panel agenda.

Recommendations

The Audit Panel is recommended to:

- a. Note the improvements being made in MOPAC Governance through the Governance Improvement Plan.
- b. Note the areas within the Governance Improvement Plan which are highlighted where delivery timescales have been pushed back.

1. Supporting Information

- 1.1. More detail on MOPACs approach to governance is set out in the three Appendices accompanying this report.
- 1.2. MOPAC has used the *CIPFA - Delivering Good Governance in Local Government guidelines* to conduct an assessment of its current position in respect of governance. For reference these are:
 - a) Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
 - b) Ensuring openness and comprehensive stakeholder engagement
 - c) Defining outcomes in terms of sustainable economic, social and environmental benefits
 - d) Determining the interventions necessary to achieve the intended outcomes
 - e) Developing MOPAC's capacity, including the capability of its leadership and of individuals in it
 - f) Managing risks and performance through robust internal control and strong public financial management
 - g) Implementing good practices in transparency, reporting and audit to deliver effective accountability
- 1.3. The results of this have been used to supplement the existing Audit recommendations within our Governance Improvement Plan. This approach has allowed us to some new areas of work to drive further improvement. These are summarised below.

Annual Governance Statement

- 1.4. The Annual Governance Statement sets out MOPACs scope of responsibilities, roles, governance provisions and finally provides an assessment of where MOPAC is placed against the seven principles of the CIPFA framework.
- 1.5. The AGS identifies a number of key areas where MOPAC has improved and where our approach to governance is working well. Among this are;
- The Police and Crime Plan continues to drive the work of MOPAC, with strong delivery across all programme areas.
 - Our new performance management process was developed and rolled out in 2018/19. This has enabled managers to set and review objectives quarterly and performance monthly.
 - Organisational objectives – via the PCP – remain clear.
 - MOPAC has a mature and well-embedded decision-making process.
 - MOPAC has an effective system for scrutiny of MPS performance and financial management, and for internal financial control.
 - We have robust arrangements in place for our continued oversight of the Met.
 - We have maintained effective internal budgetary controls, and offered training and guidance to non-finance staff, including those involved in commissioning and contracting
 - MOPAC ran four of its regular public forums in 2018/19, *Justice Matters*, covering disproportionality in the criminal justice system, Knife Crime, Reducing Reoffending, VAWG and Hate Crime.
 - MOPAC has a code of conduct for staff in which is outlined the highest standards to which MOPAC staff should conduct themselves
 - We supported the Victims' Commissioner in the creation and delivery of the second Victim's Summit in March 2019
 - MOPAC continues to reach out to the public to ask their opinions and get their views through a variety of robust measures.
 - In December 2018, the Mayor published a comprehensive Review of the MPS Gangs Matrix, fulfilling his commitment to Londoners to do so, with the aim of restoring communities' trust and confidence in the way it is used by the police.
- 1.6. In line with our commitment to continually improve we have also identified key areas for improvement. These include;
- While MOPAC has good structures in place around the delivery and tracking progress on the PCP, there is more to do to communicate to partners and stakeholders the outcomes and benefit of the work undertaken.
 - With the Violence Reduction Unit mobilising, work is underway to ensure their workplan is clear and differentiated from core MOPAC work.
 - To increase understanding of the risk management approach at team level MOPAC will now introduce a more detailed risk register for each directorate

- Robust governance arrangements are in place but as yet there is no systematic way for ensuring issues – or changes - are disseminated to staff.
- We will complete our review of the delivery arrangements to ensure we are providing the most effective service to the ICV scheme.
- We will develop a framework for effective complaints oversight.
- We are committed to continuous improvement and will look to implement new SLAs on time taken to publish minutes and papers for boards, bi-lats and decisions.
- MOPAC will review our need for safeguarding training across the organisation and provide it where appropriate.
- MOPAC will create and roll our anti-fraud training in early 2019-20
- Our work on improving transparency and diversity of our community engagement mechanisms will continue and there will be a focus on delivering our active citizenship agenda.

Governance Improvement Plan

- 1.7. Appendix B, the Governance Improvement Plan for 2018/19, collates MOPACs areas for improvement and sets out their source, the specific recommendation they relate to, actions taken or proposed, action owners and a proposed completion date. The areas for improvement identified have been compiled from:
- Outstanding actions from the Governance Improvement Plan 2017/18 which are carried forward into this year’s plan.
 - Areas identified in the Annual Governance Statement (AGS) in sections marked “What could be improved”.
 - The DARA Internal Audit Annual Report 2017/18 and subsequent inspection reports.
- 1.8. This is a live document, refreshed monthly for internal review purposes, allowing leads to set realistic timescales for improvement actions and to capture in year DARA recommendations. A comprehensive annual refresh is undertaken to include AGS outputs. This will be presented to the September panel for consideration.

Overview

- 1.9. There are 48 work-streams captured in the MOPAC Governance Improvement Plain for 2018/19. These relate to specific recommendations (either new or carried forward from the 2017/18 plan) or areas self-assessed as requiring improvement through the AGS process.
- 1.10. As at the end of 2018/19, 32 (67%) of these are complete and a further 14 (29%) reported as on track. There are currently six recommendations where initial delivery timescales have been revised. Of these five are scheduled to be delivered this calendar year with the remaining one being subject to Home Office complaints reform delays and now anticipated in 2020. All six

recommendations will carry forward into the 2019/20 Governance Improvement Plan.

Key Achievements

- 1.11. Work continues to progress improvements in MOPAC's governance and control mechanisms. Since the last update to Audit Panel in March, a further seven areas of improvement have been completed. Notable successes include:
- The ethical framework that governs MPS decision making on commercial opportunities has been refreshed. (A3)
 - The VCOP review was launched at the Victims' summit in March (B2)
 - Regular engagement with MPS on key issues from Community Monitoring Groups in place, improving transparency, integration with MOPAC governance. (B3)
 - A system has been developed to enhance the range of opportunities for stakeholder input. (D2)
 - MOPAC's business continuity plan is up to date and has been tested with staff. (E4)
 - Internal capacity on contract management has been enhanced with a team in place and plan developed. (F4)
 - Agreement of a transparency action plan which includes actions to publish board minutes, FOIs and decisions more quickly. (G1).

Areas of Improvement

- 1.12. There are seven areas where MOPAC has pushed back delivery dates for recommendations. The reasons for this slippage are understood and the risks managed. These are summarised below.
- 1.13. **Update the anti-fraud strategy to raise awareness and update policy amongst staff (A2).** Practical guidance on e-learning will be issued to staff and compliance tracked by HR. There are currently delays in the procurement of a suitable training package.
- 1.14. **Develop a broader active citizenship and engagement strategy (B1).** Some delay due to priority to resolve Community Monitoring Groups first (same resource within team) and need to build better business case for investment. There are no plans to produce a public strategy, but instead an internal action plan agreed with the Met, with visible public commitments.
- 1.15. **Continue to strengthen and develop the work of the LCRB and its sub boards to ensure appropriate delivery arrangements for key partnership PCP commitments and wider MOPAC priorities (C1).** A review of PCP partnership commitments has taken place to prioritise stakeholder engagement to enable PCP delivery. PCP commitments now agreed with boards. Further work to embed the update process within MOPAC's PCP governance process.
- 1.16. **Consider further improvements to the investment decision making between the MPS and MOPAC (D1).** Two MOPAC-MPS workshops have

already taken place and Financial and Contract regulations have been updated. Further work will take place over the spring and summer to work on wider arrangements. This was reliant on the Met Exec redesign, which has now been completed.

- 1.17. **Consider how to adapt our approach to oversight in the light of HMICFRS FMS (F3).** Work will progress over the spring and summer. This will involve collaboration between MOPAC and MPS colleagues.
- 1.18. **Data sharing agreement and compliance with GDPR (F10).** MOPACs CFO and Data Protection Officer are working closely with the MPS Director of Data, Information and Insight to review wider information sharing agreements between the two organisations, covering a wider scope than the previous E&I focussed work.
- 1.19. **Develop a framework for effective complaints oversight - Given the forthcoming new statutory responsibility to specifically have oversight of public complaints (G8).** We are awaiting the delayed Home Office reforms, now anticipated in August 2020.

2. **Equality and Diversity Impact**

Governance processes embed consultation in MOPACs approach and recognise that equality, diversity, and community engagement should be treated as strategic priorities

3. **Financial Implications**

There are no direct financial implications from this report.

4. **Legal Implications**

Under the Local Government Act 1999, MOPAC has a statutory duty to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. In discharging this overall responsibility, MOPAC is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the exercise of its functions, including a sound system of internal control and management of risk.

5. **Risk Implications**

The paper identifies the key risk areas in the Governance Improvement Plan and shows how these are being managed.

6. **Contact Details**

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7. **Appendices and Background Papers**

Appendix A – MOPAC Annual Governance Statement 2018/19

Appendix B – MOPAC Governance Improvement Plan – Official Sensitive



Annual Governance Statement 2018/19

1. Introduction

The 2018/19 Annual Governance Statement (AGS) is drawn up in line with the *CIPFA - Delivering Good Governance in Local Government*¹ guidelines, which build on the Nolan principles². It gives us the opportunity to explain the framework, processes and procedures in place to enable the Mayor's Office for Policing and Crime (MOPAC) to carry out its functions effectively whilst ensuring the organisation continues to achieve value for money.

2018-19 was the second full year of delivery under the Mayor's Police and Crime Plan (PCP) to which our business plan and governance arrangements are aligned. These ensure that the appropriate oversight is exercised in all key areas of business, both in terms of effectively discharging statutory and regulatory requirements including those in the 2011 Act and in meeting the requirements of the PCP.

2018-19 saw the creation of the Violence Reduction Unit (VRU) which brings together specialists from health, police, local government, probation and community organisations to tackle violent crime and the underlying causes of violent crime. Governance arrangements for the VRU are included in the AGS for clarity.

Within the Statement is a review against our governance framework, a review of effectiveness of our governance arrangements and an action plan to address the governance issues raised.

2. Scope of Responsibilities

The business to be conducted by MOPAC is principally set out in the Police Reform and Social Responsibility Act 2011, with other statutory requirements set out in other Acts of Parliament. The Financial Management Code of Practice requires that MOPAC, similar to other Police and Crime Commissioners, ensures that the Good Governance principles are embedded within the way that MOPAC operates. The requirements on MOPAC, and its governance structures are summarised below.

Overarching Duties

MOPAC must secure the maintenance of the Metropolitan Police Service and ensure that it is efficient and effective. It does this by holding the Commissioner to account for the exercise of their functions including: the duty to have regard to the Police and Crime Plan; the duty to have regard to the national Strategic Policing Requirement; the effectiveness and efficiency of the Commissioner's arrangements for co-operating with other persons in the exercise of the Commissioner's functions; the effectiveness and efficiency of the Commissioner's arrangements under section 34 (engagement with local people); the exercise of the Commissioner's functions under Part 2 of the Police Reform Act 2002 in relation to the handling of complaints; the extent

¹ <http://www.cipfa.org/policy-and-guidance/publications/d/delivering-good-governance-in-local-government-framework-2016-edition>

² <https://www.gov.uk/government/publications/the-7-principles-of-public-life>

to which the Commissioner has complied with section 35 (value for money); the exercise of duties relating to equality and diversity imposed on the Commissioner; and the exercise of duties in relation to the safeguarding of children and the promotion of child welfare that are imposed on the Commissioner by sections 10 and 11 of the Children Act 2004. MOPAC is responsible for handling complaints against the Commissioner.

Information

MOPAC is required by legislation to publish information which it considers to be necessary to enable the persons who live in London to assess:

- the performance of MOPAC in exercising its functions, and
- the performance of the Commissioner in exercising the Commissioner's functions.

Where the manner and timing of publication are specified in legislation MOPAC must comply with this. The information necessary to enable this must be published as soon as practicable after that time or the end of that period.

- MOPAC may provide (whether by publication or other means) information about:
 - the exercise of the body's functions, and
 - the exercise of the functions of the Commissioner

Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS)

MOPAC is required to formally respond to HMICFRS reports. MOPAC comments, together with any comments submitted by the Commissioner and any response to those comments by MOPAC, must be published with 56 days of the publication of any report. If the published report includes a recommendation, MOPAC comments must include an explanation of:

- the action MOPAC has taken or proposes to take in response to the recommendation, or
- why MOPAC has not taken, or does not propose to take, any action in response.

Custody

MOPAC must make arrangements for detainees to be visited by persons appointed under the arrangements ("Independent Custody Visitors"); and keep those arrangements under review and from time to time revise them as they think fit. The arrangements must ensure that the persons appointed under the arrangements are independent of both MOPAC and the Commissioner.

MOPAC is required to publish information as to the operation of the arrangements.

Governance

MOPAC is a corporation sole that ensures that its business is conducted in accordance with the law and proper standards and that public money is safeguarded, properly accounted for and that the value for money (VfM) principles of economy, efficiency and effectiveness are strongly adhered to. The Mayor of London's Police and Crime Plan (PCP) outlines the strategic priorities for policing and community safety in London, against which the Commissioner is held to account. To deliver the PCP launched in March 2017, MOPAC is clear about its priorities:

- A better police service for London,
- A better criminal justice service for London;
- Keeping children and young people safe;
- Tackling Violence Against Women and Girls and

- Standing together against hatred, intolerance and extremism.

These priorities were agreed following a significant consultation with the public, and in line with the requirements under section 6 (6) of the Police Reform and Social Responsibility Act 2011 (PRSR 2011), the consultation also included consulting with the Commissioner of Police of the Metropolis in developing the draft Plan, and consulting with the Commissioner on the amended Plan (further to responses to the consultation). In accordance with section 6 (6) of the PRSR 2011 the Plan was also sent to the Police and Crime Committee of the London Assembly, who had the opportunity to question the Deputy Mayor for Policing and Crime (DMPC) at the Police and Crime Committee in January and February 2017. The Committee responded by way of a report, to which MOPAC provided a public response. Further statutory consultation took place (further to section 42 (1) of the Greater London Authority Act 1999 (“the GLA Act 1999”)) which included consulting with other functional bodies, London Borough Councils and the Common Council.

The agreed objectives are supported by a business plan.

The Mayor delegates day to day running of MOPAC to the Deputy Mayor for Policing and Crime, whose role is similar to that of an elected Police and Crime Commissioner elsewhere.

The Commissioner of Police of the Metropolis is an independent legal entity and also a corporation sole. The Commissioner is accountable in law to MOPAC for the delivery of efficient and effective policing, management of resources and expenditure by the Metropolitan Police Service (MPS). He or she is also responsible for delivering operational policing. The MPS has its own Annual Governance Statement supporting its own internal control and risk management framework.

MOPAC uses a variety of governance structures to execute its functions.

The London Crime Reduction Board (LCRB), Chaired by the Mayor, was established as a means of rationalising a number of establishing pan-London partnership boards and to improve accountability between partners through the delivery of an agreed partnership plan.

The Delivery Management Group (DMG) is chaired by the Deputy Commissioner of the MPS and the Deputy Mayor for Policing and Crime. It meets quarterly to establish a work plan based on input from members of the LCRB sub-boards. It reports on key issues of strategic importance to the delivery of the LCRB’s plan; aims to maximise capabilities and efforts of partners; to assesses impact through regular analysis; and, commission services where performance gaps are identified.

MOPAC also convenes other partnership Boards to drive activity on key statutory requirements and Police and Crime Plan commitments. The Serious and Organised Crime Partnership Group has been established to aid the disruption and enforcement against serious organised crime networks in London by increasing awareness, information sharing and multi-agency disruption activity by London-wide and local partners. The London Modern Slavery Partnership Board brings together leadership to set strategic direction for tackling modern slavery in London. It aims to convene key London partners to understand response, shape future strategy and facilitate a shared vision and approach.

MOPAC has also convened further partnership activity and oversight on the delivery of the Mayor’s Knife Crime Strategy. The DMPC Chairs a Knife Crime Strategy Executive Board with criminal justice service partners, with a number of subgroups to lead specific workstreams. A review is underway to incorporate this structure more closely into the LCRB framework.

Since the creation of MOPAC under the Police Reform and Social Responsibility Act (PRSRA) 2011 there has been a Scheme of Delegation and Consent to ensure that decisions are made at the lowest level consistent with efficient and effective decision making whilst ensuring that MOPAC, DMPC and the MPS are properly protected for the risks associated with being the individual held to account for all decisions made.

MOPAC's published Scheme of Delegation and Consent sets out approval delegations and in particular, states business cases for revenue and capital expenditure, budget virements and/or movements above £500,000 be delegated to the DMPC.

Under the Local Government Act 1999, MOPAC has a statutory duty to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. In discharging this overall responsibility, MOPAC is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the exercise of its functions, including a sound system of internal control and management of risk.

The Metropolitan Police Service (MPS) operates a number of Police Act 1996 s22 collaboration arrangements, including the hosting of the National Police Chiefs' Council (NPCC). A s22 collaboration agreement enables chief officers of police, local policing bodies and other parties to make an agreement about the discharge of functions by officers and staff where it is in the interests of value for money of their own and other police force areas. MOPAC has the responsibility to approve proposed s22 collaboration agreements involving MOPAC and the MPS.

MOPAC is required to produce an Annual Report in compliance with the Police Reform and Social Responsibility Act 2011. This is also an opportunity to report on progress in relation to activities, achievements, the financial position, performance against PCP priorities and objectives and ensure that it is communicated publicly.

The 2018/19 Annual MOPAC report will be published in Summer 2019, to sit alongside the final AGS and the MOPAC accounts. It will be presented to a future PCC meeting for scrutiny.

Violence Reduction Unit (VRU)

In response to increasing violence in London, the Mayor announced the formation of the VRU in September 2018. For the remains of the 2018-19 period, MOPAC led efforts to mobilise the new unit, including the appointment of its Director, Lib Peck and the initiation of a review into homicides and serious violence incidents since 2014. By the end of March 2019, recruitment for the new unit was underway and in early 2019-20 the VRU will be fully operational.

The VRU is taking a fundamentally different approach to violence reduction – one where the institutions and communities that make up London act together to help identify and address the underlying causes of violence. The Mayor chairs a Partnership Reference Group, to ensure that partner views are at the heart of the mobilisation of VRU's work. The Group met for the first time in October 2018 and met for a total of four times in 2018-19.

In order to keep the work of the VRU fresh and informed by professionals from across the capital, membership of the group will continue to be refreshed as the unit moves from mobilisation to BAU.

The VRU is guided in City Hall with input from the Deputy Mayor of Policing and Crime, the Deputy Mayor for Social Integration, Social Mobility and Community Engagement (DMSI); and the Deputy Mayor for Education and Childcare (DMEC). MOPAC remains legally accountable for the decisions and operations of the VRU insofar as they relate to its' responsibilities. Where decisions relate to MOPAC's responsibilities, the VRU is subject to MOPAC's scheme of delegation and consent. The VRU's permanent staff are employed on MOPAC terms and conditions.

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3. Governance provisions - Governance Framework, Code of Governance and Governance Arrangements

The MOPAC Governance Framework (see figure 2) is modelled on the CIPFA produced *International Framework: Good Governance in the Public Sector* (the framework). It remains dynamic and subject to continuous improvement.

The Framework includes seven principles of a well-governed organisation. These are:

- a) Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
- b) Ensuring openness and comprehensive stakeholder engagement
- c) Defining outcomes in terms of sustainable economic, social and environmental benefits
- d) Determining the interventions necessary to achieve the intended outcomes
- e) Developing MOPAC's capacity, including the capability of its leadership and of individuals in it
- f) Managing risks and performance through robust internal control and strong public financial management
- g) Implementing good practices in transparency, reporting and audit to deliver effective accountability

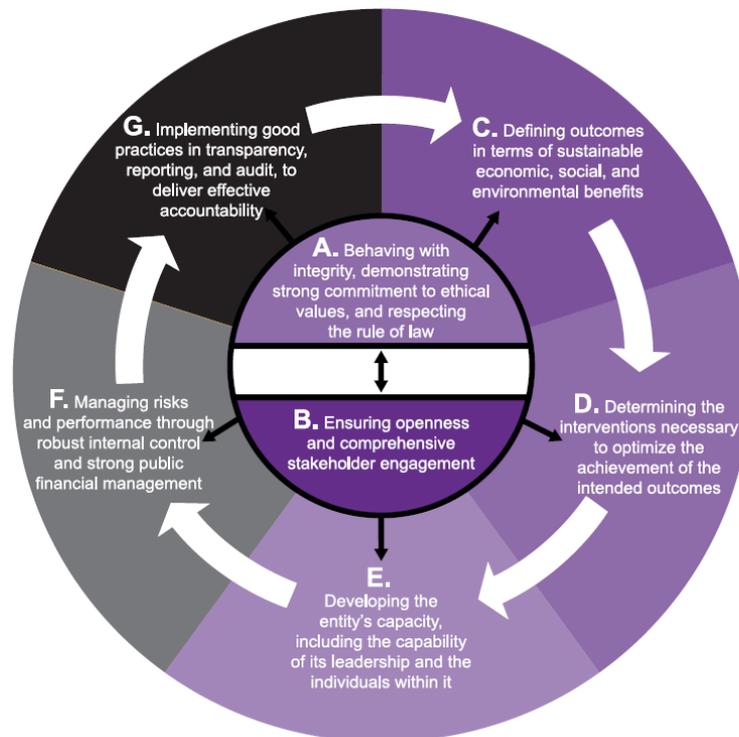
The framework enables MOPAC to monitor and evaluate achievements against its strategic objectives – outlined in the business plan and PCP – and it is against this framework we have evaluated effectiveness in this document for the year 2018-19.

Similarly to colleagues within the MPS, we are keen to apply these principles as they are seen in the diagram. C-G as the core principles of governance with A and B – key principles – underpinning it all.

The MOPAC code of governance uses the framework as its base and ensures its principles are integrated into how MOPAC conducts business locally.

MOPAC's governance arrangements – outlined in Appendix 1 – are how we effectively deliver our governance and scrutiny of objectives, operations and delivery.

Figure 2- International Framework: Good Governance in the Public Sector (CIPFA/IFAC, 2014)



MOPAC can demonstrate that the systems and processes in place to support these governance provisions are:

- monitored for their effectiveness in practice via the Quarterly Reports to the Joint MOPAC and MPS Audit Panel and annually via this Annual Governance Statement
- Subject to scheduled reviews by the Directorate of Audit, Risk and Assurance (DARA) to ensure it remains up to date and fit for purpose
- Improved and actioned through the organisation via the Governance Improvement Plan

4. Review against the Framework 2018/2019

The following section provides an assessment of where MOPAC is placed against the seven principles of the CIPFA framework. As previously discussed, our reporting on this is against the principles C-G and then A and B, as key principles which underpin the rest.

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

What is working well?

The Police and Crime Plan continues to drive the work of MOPAC, with strong delivery across all programme areas.

This year, due to the increase in violent crime, the Mayor launched the Violence Reduction Unit (VRU). The VRU has been created as a partnership unit bringing together expertise across City Hall and Partners to drive forward a Public Health Approach to tackling violence. MOPAC has been central to the mobilisation and early staffing of the unit. It is expected the unit will be up to full strength in financial year 19/20.

Organisational objectives – via the PCP – remain clear.

Throughout 2018-19 we continued to strengthen and develop the work of the LCRB and its sub-boards to ensure that there were appropriate delivery arrangements for key partnership PCP commitments and wider MOPAC priorities.

The decision process has been amended to capture GDPR considerations effectively, ensuring further information is available in the process to the Deputy Mayor for Policing and Crime and MOPAC Directors.

How did we respond to last year's recommendations?

Throughout 2018/19 MOPAC embedded a more systematic programme management, business planning and risk management processes to track delivery across the PCP.

What could be improved?

While MOPAC has good structures in place around the delivery and tracking progress on the PCP, there is more to do to communicate to partners and stakeholders the outcomes and benefit of the work undertaken.

With the VRU mobilising, work is underway to ensure their workplan is clear and differentiated from core MOPAC work.

Determining the interventions necessary to achieve the intended outcomes

What is working well?

MOPAC has a mature and well-embedded decision-making process. The governance framework, including the Scheme of Delegation and Consent, decision making framework and supporting financial and contract regulations, define and document the roles and responsibilities of MOPAC

and the MPS. All MOPAC decisions are discussed at DMPC/Directors meetings, published online and available for public scrutiny.

Throughout 2018-19, the Victim's Commissioner has used her independent position and VCOP review to inform commissioning of Victim's Services.

The investment decisions recommended to MOPAC by the MPS are scrutinised at the Investment Advisory and Monitoring Meeting to ensure they are aligned with the Police and Crime Plan and/or other statutory requirements for policing, and that they contribute to achieving an effective and efficient police service for London. We put considerable focus in this area, particularly given the significant decisions required in many areas of the MPS transformation programme, such as strengthening local policing, transforming investigations and prosecution, and transforming the MPS estate.

Evidence and Insight (E&I) are the dedicated analysis and research function within MOPAC. The team works across the organisation, providing in-depth analysis and a robust evidence base across the breadth of our work areas. The research and analytics capabilities within E&I are varied, and include innovative analysis of crime and criminal justice, data visualisation and dashboards, large-scale surveys, data analysis, social research and programme evaluations.

How did we respond to last year's recommendations?

We continued to focus on the effectiveness of arrangements for investment decision-making between the MPS and MOPAC. Our work included creating an understanding of the internal and external assurance of the MPS large scale investments, in line with the frameworks introduced by the Met, transformation directorate and commercial arrangements for major suppliers.

Throughout 2018-19 we have been focused on tracking and realising benefits from our wider work and not just looking at delivery outputs. By doing this it has allowed us to communicate to our stakeholders, the public and our scrutiny the effect of our commissioning and investment decisions on London and Londoners.

We continued to improve our processes to ensure that we fulfil our responsibilities to respond to reports published by HMICFRS that concern the Metropolitan Police. We ensured that any recommendations that are contained within reports about the MPS are specifically addressed, explaining what action is being taken to address the issue raised. These responses are sent to the Secretary of State and they are published on our website. For example, the HMICFRS report on Child Protection within the Met prompted the creation of the Child Protection Oversight Board chaired by the DMPC.

What could be improved?

Greater demands on professional advice on procurement mean that we are reviewing support available in this area. In the coming year, we may want to introduce formal SLAs with Transport for London (TfL) and MPS shared service functions to help with the demand.

We published our contracts register in early 2019 and will publish information on Victims Commissioning in the summer. This will include information on contract outcomes.

Further to the VCOP Review – mentioned later in this document – the findings by the Victim's Commissioner will feed into victims commissioning.

Developing MOPAC's capacity, including the capability of its leadership and staff

What is working well?

In 2018/19, MOPAC's People Strategy was created and implemented.

This included:

- Building an inclusive culture and a workforce that is as diverse as the city we serve, where we hold ourselves to the same standards of inclusion as we do the MPS;
- Developing core training in areas such as information governance and unconscious bias;
- Embedding new induction processes and creating a new staff handbook – including the reviewing of all HR policies -making it easier for staff to find, use and understand policy, procedures and code of conduct;
- Managing and developing our people through effective performance management, reward and recognition and learning and development, and;
- Developing great managers and leaders through talent management and building management capability.

Our new performance management process was developed and rolled out in 2018/19. This has enabled managers to set and review objectives quarterly and performance monthly.

MOPAC has a clear and transparent recruitment process. We are committed to the Mayor's standard on diversity, abide by all the necessary legislation and continue to invite applications from across London's communities.

In 2018/19 we have acted on diversity in recruitment, particularly in relation to ethnicity – such as rolling out unconscious bias training for all staff; using different online recruitment platforms; more engaging adverts and using case studies demonstrating the diversity within MOPAC. Evidence so far shows positive outcomes in recent campaigns, for example the VRU bulk recruitment campaign where the proportion of BAME applicants was 52% compared with an average in MOPAC recruitment campaigns of 39% during 2018.

MOPAC undertook a staff survey as it now does every year. Overall MOPAC staff scored the organisation a 77% for employee engagement, up from 74% the previous year. This is a score that reflects more than just satisfaction. It's an indicator of how connected staff feel to the organisation and to achieving its goals.

We promoted strong staff engagement and internal communications through regular start the week meetings, and quarterly all-staff meetings which concentrated on leadership and elements of staff training throughout the year. We increased our offer around health and wellbeing, inviting staff to vicarious trauma training and offering Space to Talk counselling.

We have strengthened our capacity around commissioning and contract management allowing us to manage the outcomes and benefits of our spend more efficiently.

How did we respond to last year's recommendations?

The main recommendation from last year was to create and implement the People Strategy which has been achieved, this included reviewing all HR policies.

Secondary to this was a learning needs analysis to determine our Learning and Development Strategy. This will help to ensure we have the skills and capabilities to deliver the PCP and other strategic objectives. This work will continue through 2019/20.

What could be improved?

Further to a recent CIPFA review of the capacity in Strategic Finance and Resource Management, we will review the increased level of demand on the team and act if further resource is needed.

Managing risks and performance through robust internal control and financial management

What is working well?

MOPAC has an effective system for scrutiny of MPS performance and financial management, and for internal financial control.

Our risk management processes and risk register are reviewed at a monthly Governance and Risk Working Group, attended by MOPAC and MPS staff. We aligned the risk registers of the two organisations and worked to define more clearly our respective roles in managing those risks. We have reported quarterly to the Audit Panel on the alignment of our risks.

The risk register is a living document and it is important to keep it under constant review. Strategic risks are well captured but perhaps the next area for development is to look at risk at the next level.

We have robust arrangements in place for our continued oversight of the Met. These are set out in Appendix 1.

Last financial year, we introduced a new consolidated quarterly pack that brings together performance and finance reporting in a consistent format. This pack, along with the MPS quarterly report on performance against its business plan, continues to form the core agenda of the quarterly Oversight Board meetings chaired by the DMPC, and is issued to the Police and Crime Committee to support wider scrutiny by Assembly Members. The Oversight Board has also considered information governance in the MPS, victim satisfaction and use of force.

We have maintained effective internal budgetary controls, and offered training and guidance to non-finance staff, including those involved in commissioning and contracting.

We rely on a range of sources of assurance for our work in managing risk and ensuring the effectiveness of our internal controls. DARA plays a critical role as the internal auditor to MOPAC and is also the internal auditor to the MPS. We also work closely with our external auditor, Grant Thornton, to absorb the recommendations made in their annual report on value for money.

How did we respond to last year's recommendations?

Last year we identified the implications of GDPR as a key risk, throughout this year MOPAC has provided face-to-face training for all staff and has assurance by way of a checklist that the team understands its implications and we are compliant.

We continued to work closely with the MPS to align our management of key strategic risks and assurance framework and will keep our risk register under constant review in the light of the changing external environment.

We continued to work with the MPS to consider whether to adapt our approach to performance and operational oversight in the light of the templates introduced by HMICFRS for the first year of the new Force Management Statements, recognising that this is an emerging area that will take time to mature.

Work continues to bring together a single view of performance of commissioned services as well the transparency of this to Londoners and stakeholders. This will initially be done by the publication of the contracts register and information on Victims Commissioning.

What could be improved?

To increase understanding of the risk management approach at team level MOPAC will now introduce a more detailed risk register for each directorate.

To further improve understanding around directorate budgets and financial processes such as raising purchase orders enhanced training will be put in place. This will allow staff to be clear on the scheme of delegation, including their responsibilities on goods receipting and keeping records around spend.

Robust governance arrangements are in place but as yet there is no systematic way for ensuring issues – or changes – are disseminated to staff.

Although there is no evidence of breaches, we intended to introduce tighter controls around staff expenses. It was not possible to integrate the additional tools in the 2018-19 but we will look to conduct this work in 2019-20.

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

In the year 2018/19, we answered 2875 pieces of correspondence, 88% of which were answered on time, in line with our agreed service levels. We answered 1103 Mayor's Questions, of which 80% were submitted ahead of, or on time. We answered 87 Freedom of Information requests, 89% of which were responded to on time.

What is working well?

Each month we produce a comprehensive monthly report to the Police and Crime Committee. The DMPC attended regular meetings of the PCC, MOPAC's Chief Executive and Directors attended a PCC session focused on the management of the organisation. In addition, the DMPC and CFO appear as required by the Budget and Performance Committee and we published information on MOPAC's budget on 30th November 2018. We will continue to update this information on an annual basis.

Mayoral and DMPC Decisions, Board agendas and minutes continue to be published on our website.

MOPAC ran four of its regular public forums in 2018/19, *Justice Matters*, covering disproportionality in the criminal justice system, Knife Crime, Reducing Reoffending, VAWG and Hate Crime.

MOPAC produces a suite of interactive data dashboards on its website, enabling the public and partners to engage with and interpret data on policing and crime in London. Spending data, financial information and minutes of meetings are also published on the website.

We have strong complaint escalation procedure for staff matters and internal working practices.

MOPAC has a gifts and hospitality policy which is included under our codes of conduct and was complied with.

To support and ensure scrutiny of the MPS, the law requires MOPAC to abide by certain regulations in matters relating to statutory functions carried out by MOPAC Professional Standards which are prescribed within Police Pensions Regulations 1987, Police (Conduct) (Amendment) Regulations 2015 and Police Appeals Tribunals (Amendment) Rules 2015. MOPAC have developed effective plans to anticipate the changes to be enacted under the Policing and Crime Act (PCA) including providing MOPAC with an increased role in the oversight of complaints about police and taking on responsibility for police appeals.

We continue to have a strong working relationship with our internal auditors, DARA, taking their formal advice and recommendations through their reports and informally through our internal governance structures and meetings. We report on our internal governance improvement actions on a quarterly basis to the DMPC and Audit Panel.

An external quality assessment sponsored by the Chair of the joint MOPAC and MPS Audit Panel, concluded that DARA had achieved full compliance with the professional standards set out under PSIAS and is recognised throughout the policing sector - and indeed elsewhere in the public sector- as being one of the leading in-house public sector internal audit services.

How have we responded to last year's recommendations?

We published a Reserves Strategy to provide greater detail about the planned use of MPS resources over the medium term.

We published the contracts register in early 2019.

We strengthened the governance arrangements for Custody Visiting, and now include regular reports on the Scheme in the Deputy Mayor's monthly report to the Police and Crime Committee.

What could be improved?

We will complete our review of the delivery arrangements to ensure we are providing the most effective service to the ICV scheme.

We will develop a framework for effective complaints oversight – given the forthcoming new statutory responsibility to specifically have oversight of public complaints. Additionally, we will define the governance arrangements to hold to MPS to account effectively for their management of complains.

We are committed to continuous improvement and will look to implement new SLAs on time taken to publish minutes and papers for boards, bi-lats and decisions.

The National Victims Strategy published a new duty for PCCs to take responsibility for compliance of the Victims Code of Practice in their area. We will be looking at how we do this alongside the other recommendations from Claire Waxman, London Victim's Commissioner's, VCOP review.

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

What is working well?

Fundamental to MOPAC's role in oversight of the Metropolitan Police is the duty to ensure that it acts in accordance with the law. This responsibility is fulfilled through the MOPAC governance framework and compliance is reviewed at the quarterly Audit Panel Meetings. The Deputy Mayor for Policing and Crime (DMPC) meets with the Chair of Audit Panel and has regular meetings with the Director of Audit, Risk and Assurance, the Head of Internal Audit for MOPAC

Supporting our oversight is the work of the London Policing Ethics Panel. The Ethics Panel provides independent advice on complex issues facing policing, and the moral and ethical implications of them. This year, the Panel published an interim report on the use of facial recognition technology by police.

In accordance with paragraph 3.7.4.3 of the Code of Practice on Local Authority Accounting, it is noted that MOPAC's financial management arrangements conform with the governance requirements of the CIPFA *Statement on the Role of the Chief Financial Officer in Local Government* (2010) as set out in the Application Note to *Delivering Good Governance in Local Government Framework*.

There is a comprehensive list of statutory requirements which is monitored. All MOPAC decisions consider the legal and risk implications amongst other implications and are published in compliance with the Elected Local Policing Bodies Orders 2011 and 2012 relating to transparency – satisfying the specified order.

MOPAC has a statutory duty to make arrangements for police custody detainees to be visited by independent persons to ensure their welfare, rights and entitlements are upheld (s51 Police Reform Act, 2002 as amended). We do this through the Independent Custody Visiting Scheme, which recruits, trains and manages a pool of approximately 200 Independent Custody Visitors (ICVs). In line with the Code of Practice, the Scheme is led by a senior MOPAC officer and ICVs provide written reports to MOPAC.

MOPAC has an anti-fraud policy, and its Directorate of Audit, Risk and Assurance provides an effective counter-fraud service to MOPAC and the MPS.

MOPAC has a code of conduct for staff in which is outlined the highest standards to which MOPAC staff should conduct themselves. Additionally, we have the MOPAC values which were developed with staff and management as a key set of value-based behaviours which the organisation aspires to conduct itself.

How did we do against last year?

MOPAC's values continue to be embedded and are used in the new induction process and in the personal performance and development framework.

MOPAC has updating its anti-fraud strategy and will want to raise awareness of the update policy amongst staff.

We have restructured the way in which the administration of the ICV Scheme is managed within MOPAC and this has improved the Scheme's governance and oversight. The ICV reports continue to be analysed and the findings shared with the Metropolitan Police Service and the national ICV Association to inform good practice. As a result of the work of our ICVs (and others nationally) the national ICV Association coordinated a campaign on the detention of female detainees, and Government has announced that it will be making changes to Police and Criminal Evidence Act (1984) Code C to ensure the Police Service more effectively responds to the rights and needs of female detainees.

What could be improved?

MOPAC will review our need for safeguarding training across the organisation and provide it where appropriate. This could be for staff who come into contacts with victims, children or who deal with sensitive information in the media.

MOPAC will create and roll our anti-fraud training in early 2019-20.

MOPAC will continue to refine the management of the ICV Scheme to ensure it remains fit for purpose and that the work of the ICVs informs policy and strategy within London and nationally (as appropriate). MOPAC will also be publishing an annual report in 2019/20, which will increase transparency and help to reassure communities about the delivery of MPS custody services.

Ensuring openness and comprehensive Stakeholder Engagement

What is working well?

Victims' Commissioner and VCOP - We supported the Victims' Commissioner in the creation and delivery of the second Victim's Summit in March 2019. Independent Victims' Commissioner Claire Waxman announced the findings of her review of compliance with the Victims' Code of Practice by justice agencies in London. The Review found that, in most cases, compliance with the code by practitioners was low, with less than a third of victims having been told about the Victims' Code or offered a referral to support services at any point during their case. Following the publication of her Review, Claire is leading work to engage with justice service partners and support services in the coming months to agree a plan of action to improve the victim experience in London.

VRU Mobilisation - The VRU was always intended to be a partnership – drawing from experience and skills across City Hall and the wider criminal justice partners. In order for the unit to be set up effective and efficiently, and mobilised within a short period of time, a huge effort went into stakeholder engagement and partnership working throughout 2018-19. This included work with local authorities, the health sector, the Met, the courts, central government and other statutory and community partners.

Wider Stakeholder Engagement - MOPAC has worked successfully and effectively with a wide and diverse range of stakeholders over the past year to ensure openness and transparency and

to work to tackle complex police and crime issues. Stakeholders include citizens, communities, voluntary and community sector organisations, public sector agencies and wider government. MOPAC has done this as MOPAC, as part the VRU and while spearheading the Mayor's CVE work.

We created, developed and delivered the Knife Crime Summit in June 2018. This brought together key stakeholders across the London criminal justice landscape to discuss and find a way forward on Knife Crime.

Evidence and Insight - MOPAC continues to reach out to the public to ask their opinions and get their views through a variety of robust measures. In particular, our Evidence and Insight team oversee a variety of surveys to capture the voices of Londoners - be they members of the public or victims of crime. This involves our work and commissioning.

This includes the Public Attitude Survey (a representative sample of 12,800 Londoners per year including questions around victimisation, fear of crime & crime concerns, attitudes to policing, contact with police) and the User Satisfaction Survey (a survey capturing perceptions of 12,800 victims of crime about the service provided to them by the Metropolitan Police Service).

In addition, we undertook targeted work to gain the views of young people through a bespoke survey to which we received nearly 8,000 responses, and also engaged with c6000 people to support our ongoing work to inform our work on improving public access [to the police] and active citizenship.

Gangs Matrix - In December 2018, the Mayor published a comprehensive Review of the MPS Gangs Matrix, fulfilling his commitment to Londoners to do so, with the aim of restoring communities' trust and confidence in the way it is used by the police. The Review found that the Gangs Matrix can be an effective enforcement tool and is helping to tackle violence on our streets. However, for too many Londoners, the way it is has been applied and enforced is a cause for concern and it needs to be comprehensively overhauled to ensure it is used lawfully and proportionately. The Review made nine recommendations to address serious breaches of data protection laws and ensure only those at genuine risk of causing or being a victim of violence are included. MOPAC continues to work with the MPS to ensure that these recommendations are carried out quickly and transparently to ensure Londoners have confidence in how it is used.

Safer Neighbourhood Boards - S14 of the Police Reform and Social Responsibility Act 2011, requires MOPAC to make arrangements for obtaining the views of the community on policing and for obtaining the views of victims of crime in that area about matters concerning the policing of the area.

As well as the other methods already described, we discharge these functions is the borough-based Safer Neighbourhood Boards (SNBs). SNBs are an accountability and engagement mechanism established by the Mayor of London to ensure the police focus on the priorities of local communities. Their role is to contribute, along with borough partners, to the establishment of local policing and crime priorities, monitor police performance and confidence, and to provide feedback to MOPAC about issues of local concern. We also provide SNBs with a small fund to support local projects to address issues that matter most to their community. We support the SNBs through a pan-London forum, the provision of a bespoke data dashboard, and by providing development opportunities in key skills, such as chairing public meetings and understanding crime statistics.

Community Monitoring Groups - Code A of the Police and Criminal Evidence Act, sets out specific duties for MOPAC in monitoring and supervising the use of stop and search powers. s5.4 specifically says that “to promote public confidence in the use of the powers, forces, in consultation with police and crime commissioners, must make arrangements for the records to be scrutinised by representatives of the community, and to explain the use of the powers” at a local level. (See Note 19.). In London, we have a well-established network of borough-based Stop and Search Community Monitoring Groups (CMGs). Comprising independent members of the public, CMGs monitor police performance on stop and search, examining local stop and search performance data, including rates of disproportionality and positive outcomes, allowing them to challenge their borough police to explain data that causes concern. We support the local groups by facilitating a pan-London network and provide training to CMG/CMN members in examining and interpreting data and the broader community engagement potential for their groups. We are working to improve this and to increase youth representation.

How did we do against last year?

In 2018/19, we established a MPS-MOPAC Public Engagement Working Group to encourage greater active citizenship at the most local level. We continue to aim for effective communications with hard to reach communities and those disproportionately affected by crime and are considering what further arrangements would support this. To address this, we have conducted bespoke engagement with communities to inform our work as and when necessary, e.g. a conducting a bespoke youth survey and targeted engagement to inform the Gangs Matrix Review. We have also worked with our existing mechanisms to ensure they are considering how they engage with hard to reach communities on key issues, e.g. SNBs are now required to specifically align their work with MOPAC’s priorities. We worked with the SNBs to review their delivery and how they can contribute to the wider active citizenship agenda. As a result, we have reviewed the project funding process to improve the governance and accountability and to ensure the fund is more effectively targeted.

In 2018/19 our work to develop the CMGs has continued. As part of our work to increase transparency we have been working with the CMGs to develop their public profile and will this year publish an annual report of their activity. The work of the CMGs is regularly reported to the Deputy Mayor for Policing and Crime through submissions and a monthly data report. The Police and Crime Committee is also informed of their work through the monthly MOPAC report. In relation to our aim to further diversify the involvement and engagement of the public in these mechanisms, particularly focussing on those who are most affected by the use of the powers, we have undertaken some targeted work with young people and have engaged 60 under-25s in a youth reference group to inform the ongoing development of community scrutiny of stop and search.

What could be improved?

There is always room for improvement on stakeholder engagement and communication. London is an ever-changing city and our relationships with communities across the capital should continue to be strengthened.

Through our commitments in transparency on publication of contracts register, we should also consider what reporting and communications we will proactively seek to undertake to let people know about the commissioned services we fund.

Our work on improving transparency and diversity of our community engagement mechanisms will continue and there will be a focus on delivering our active citizenship agenda. We should work to ensure that our webpages remain up-to-date and user friendly.

Our private office function has been significantly reformed in the last year, staff would benefit from ongoing training on briefings and correspondence to ensure timely and appropriate replies.

Over the coming year we will be further developing the CMGs to increase transparency, integration with MOPAC governance, and to further diversify the involvement and engagement of the public in these mechanisms, particularly focussing on those who are most affected by the use of the powers.

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5. Reviewing the effectiveness of MOPAC's governance arrangements

The governance arrangements for MOPAC – outlined in Appendix 1 – have been developed in line with the 2011 Police Reform and Social Responsibility Act, Statutory Policing Protocol, Home Office Financial Management Code of Practice and existing guidance on financial and governance regulations. There are defined lines of accountability, roles and responsibilities.

The reporting mechanisms between the respective MOPAC boards and management meetings through the Scheme of Delegation and Consent and respective terms of reference are clear and remain fit for purpose.

Our code of Governance was amended last year to fully reflect the *CIPFA - Delivering Good Governance in Local Government*.

The Chief Executive and Directors have reviewed the effectiveness of our governance arrangements and their views have been reflected in the areas identified for improvement above.

6. Governance issues for improvement

The Director of Audit, Risk and Assurance is due to give her opinion in June 2019, which will be included in the final Annual Governance Statement and will inform the Governance Improvement Plan.

Her opinion for this draft document is: *'MOPAC has established an adequate internal control environment, which is generally operating effectively.'*

As part of the DARA annual report, areas will be identified as key to strengthening the internal control environment in support of achieving policing priorities and objectives. These will be included in the final AGS.

Throughout 2018-19, DARA completed audit reviews on:

- GDPR Framework
- Transparency and Reporting
- Business Planning Framework
- Financial Oversight follow up

Additionally, they are about to report on:

- Commissioning Framework
- Strategic Oversight
- E&I.

Recommendations from these are routinely incorporated in the AGS.

Action on the improvement areas set out by DARA above will further enhance MOPAC's governance arrangements and together with on-going actions from the Governance Improvement Plan will be monitored by the Audit Panel on a quarterly basis.

	Recommendation	Priority	Management Response
1	MOPAC should build on the progress made in building its capacity and capability to commission and monitor delivered services, and prioritise reporting transparently the performance of these services against priority outcomes.	High	Reporting structures, processes and systems have been strengthened in this area, and external reporting continues to develop. Complete
6	Consideration of issues fundamental to major decisions should take place as early as possible in the governance process and, once considered, should be signed up to by all decision makers. Whilst re-consideration of fundamental issues at a later date should never be ruled out, this should be triggered by new information or material changes in internal or external environments, rather than a lack of detailed focus, or limited participation by decision makers, earlier in the decision making life-cycle. Decision makers need to remain open to each others' challenge to ensure the level or focus of scrutiny of investment / business cases is always appropriate to each stage of the investment appraisal process. Decisions made earlier in the process should be documented, along with the key judgements informing those decisions, to minimise the risk of these decisions being revisited unnecessarily at a later date. This may help minimise delay, disruption and cost later in the investment appraisal process.	Medium	The Terms of Reference for the Investment Advisory and Monitoring meeting (IAM) have been adjusted to enable the MPS to bring strategic outline cases and matters of interest earlier in the project lifecycle. The forward planner supports MOPAC's officers in early engagement before IAM and assists in identifying future major procurements. Complete

There were additional areas of improvement which were identified by the *Grant Thornton Joint Value for Money Report 2017-18*. The overall conclusion of the report is that "MOPAC and MPS both have proper arrangements in all significant respects to ensure they delivered value for money in their use of resources". While heartening, the areas from improvement identified which involve MOPAC have been added to the Governance Improvement Plan. Set out below is the management response and progress .

Governance Improvement Plan 2019/20

The areas outlined in Section 4 of this document as needing improvement, will be added to our Governance Improvement Plan 2019/20.

The Governance Improvement Plan outlines all improvement areas and steps necessary to further enhance our governance arrangements and ensure that MOPAC's governance continues to improve.

It identifies and tracks more detailed actions against outstanding improvements.

For reference, the key improvement areas have been highlighted in the table below.

<i>Principle</i>	MOPAC
<u>Defining outcomes in terms of sustainable economic, social and environmental benefits</u>	<p>While MOPAC has good structures in place around the delivery and tracking progress on the PCP, there is more to do to communicate to partners and stakeholders the outcomes and benefit of the work undertaken.</p> <p>With the VRU mobilising, work is underway to ensure their workplan is clear and differentiated from core MOPAC work.</p>
<u>Determining the interventions necessary to achieve the intended outcomes</u>	<p>Greater demands on professional advice on procurement mean that we are reviewing support available in this area. In the coming year, we may want to introduce formal SLAs with Transport for London (TfL) and MPS shared service functions to help with the demand.</p> <p>We published our contracts register in early 2019 and will publish information on Victims</p>

<p><u>Developing MOPAC’s capacity, including the capability of its leadership and staff</u></p>	<p>Commissioning in the summer. This will include information on contract outcomes.</p> <p>Further to the VCOP Review –the findings by the Victim’s Commissioner will feed into victims commissioning.</p>
<p><u>Managing risks and performance through robust internal control and financial management</u></p>	<p>Further to a recent CIPFA review of the capacity in Strategic Finance and Resource Management, we will review the increased level of demand on the team and act if further resource is needed.</p> <p>To increase understanding of the risk management approach at team level MOPAC will now introduce a more detailed risk register for each directorate.</p> <p>To further improve understanding around directorate budgets and financial processes such as raising purchase orders enhanced training will be put in place. This will allow staff to be clear on the scheme of delegation, including their responsibilities on goods receipting and keeping records around spend.</p> <p>Robust governance arrangements are in place but as yet there is no systematic way for</p>

<p><u>Implementing good practices in transparency, reporting and audit to deliver effective accountability</u></p>	<p>ensuring issues – or changes – are disseminated to staff.</p> <p>Although there is no evidence of breaches, we intended to introduce tighter controls around staff expenses. It was not possible to integrate the additional tools in the 2018-19 but we will look to conduct this work in 2019-20.</p> <p>We will complete our review of the delivery arrangements to ensure we are providing the most effective service to the ICV scheme.</p> <p>We will develop a framework for effective complaints oversight – given the forthcoming new statutory responsibility to specifically have oversight of public complaints. Additionally, we will define the governance arrangements to hold to MPS to account effectively for their management of complains.</p> <p>We are committed to continuous improvement and will look to implement new SLAs on time taken to publish minutes and papers for boards, bi-lats and decisions.</p> <p>The National Victims Strategy published a new duty for PCCs to take responsibility for compliance of the Victims Code of Practice in their area. We will be looking at how we do this alongside the other recommendations from</p>
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<p><u>Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law</u></p>	<p>Claire Waxman, London Victim's Commissioner's, VCOP review.</p> <p>MOPAC will review our need for safeguarding training across the organisation and provide it where appropriate. This could be for staff who come into contacts with victims, children or who deal with sensitive information in the media.</p> <p>MOPAC will create and roll our anti-fraud training in early 2019-20.</p> <p>MOPAC will continue to refine the management of the ICV Scheme to ensure it remains fit for purpose and that the work of the ICVs informs policy and strategy within London and nationally (as appropriate). MOPAC will also be publishing an annual report in 2019/20, which will increase transparency and help to reassure communities about the delivery of MPS custody services.</p>
<p><u>Ensuring openness and comprehensive Stakeholder Engagement</u></p>	<p>There is always room for improvement on stakeholder engagement and communication. London is an ever-changing city and our relationships with communities across the capital should continue to be strengthened.</p> <p>Through our commitments in transparency on publication of contracts register, we should</p>

	<p>also consider what reporting and communications we will proactively seek to undertake to let people know about the commissioned services we fund.</p> <p>Our work on improving transparency and diversity of our community engagement mechanisms will continue and there will be a focus on delivering our active citizenship agenda.</p> <p>We should work to ensure that our webpages remain up-to-date and user friendly.</p> <p>Our private office function has been significantly reformed in the last year, staff would benefit from ongoing training on briefings and correspondence to ensure timely and appropriate replies.</p> <p>Over the coming year we will be further developing the CMGs to increase transparency, integration with MOPAC governance, and to further diversify the involvement and engagement of the public in these mechanisms, particularly focussing on those who are most affected by the use of the powers.</p>
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7. Identification of further governance improvement initiatives in 2019/20

It is proposed that over the coming year, Internal Audit will review the following areas, which are aligned to MOPAC strategic objectives and risks, and MOPAC will take steps as appropriate to address any governance and control issues that arise:

Implementation of the Police and Crime Plan

- Planning for the Police and Crime Plan 2020 -2024
- Community Engagement
- Follow Up Reviews:
 - MOPAC Holding the MPS to Account
 - Business Planning and Performance Framework
 - Evidence and Insight Strategic Framework

Governance

- Risk Management – Identifying and Managing risk Interdependencies (LCRB, DMG, etc.)
- Commissioning – Co-commissioning (including with Met)
- Follow Up Reviews:
 - Transparency and Reporting
 - GDPR Governance Framework
 - Treasury Management (GLA review)
 - Commissioning Framework – Evaluation

8. Statement of Assurance

MOPAC's governance arrangements are designed to ensure that we take an appropriate and proportionate approach to managing risk. The arrangements are not designed to eliminate all risks but rather provide a reasonable degree of assurance of our effectiveness in managing the risks.

We are satisfied that the steps set out above have addressed the need for improvements that were identified in the review of effectiveness. We will continue to monitor their implementation and operation during the year and as part of our next annual review.

24th May 2019

24th May 2019

Signed

Signed

Sophie Linden
Deputy Mayor for Policing and Crime

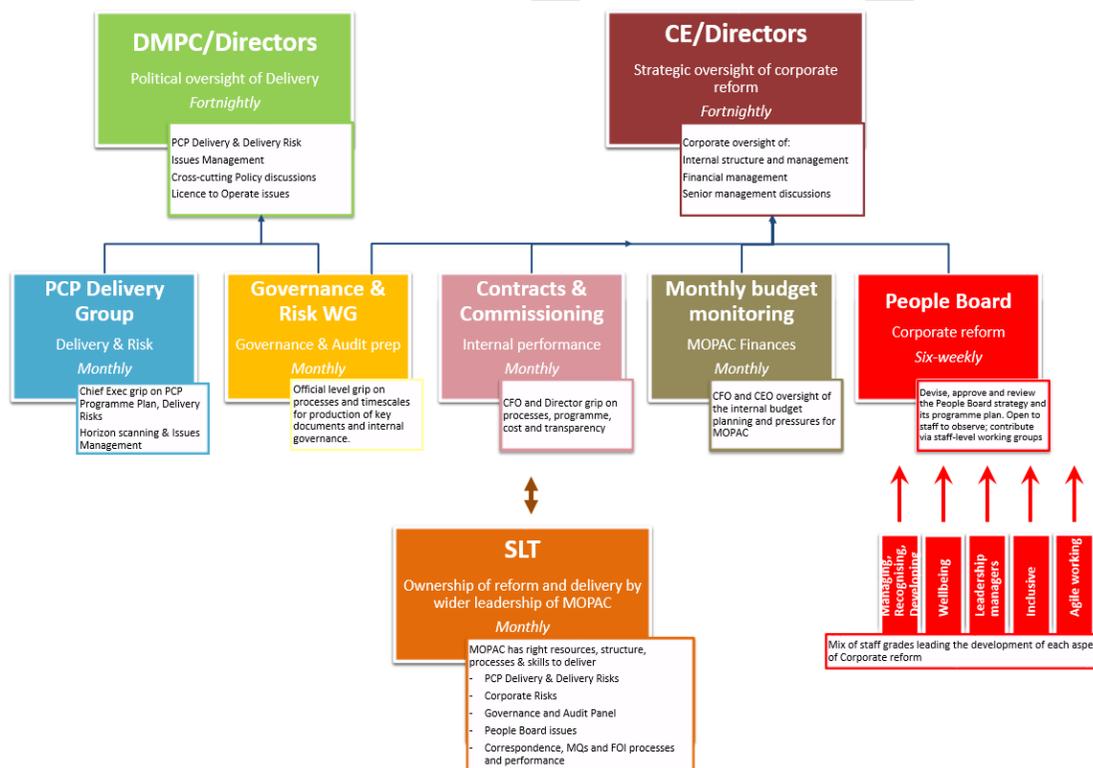
Rebecca Lawrence
Chief Executive

APPENDIX 1

Governance Arrangements

Following the launch of the PCP in March 2017, the internal governance arrangement was reviewed to ensure effective monitoring. MOPAC’s internal governance arrangements are set out in figure 1.

Figure 1 – MOPAC Internal Governance Arrangement



MOPAC is held to account over its objectives, operations and delivery of the PCP through various Boards and Panels, which are detailed below.

Holding the MPS and partners to account

i. Oversight Board

The Oversight Board enables the DMPC to effectively exercise the role and duties of the Police and Crime Commissioner for the Metropolis, as delegated by the Mayor of London.

The functions of the Oversight Board are to

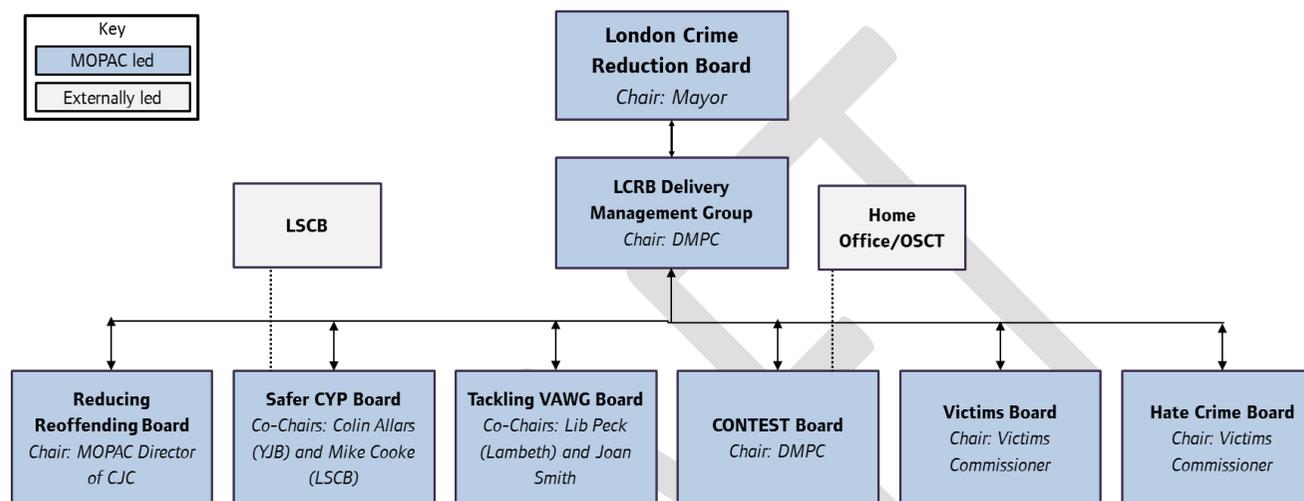
- Scrutinise MPS delivery against the Police and Crime Plan on behalf of the Mayor, and performance against agreed priorities
- Have oversight of value for money through economy, efficiency and effectiveness
- Undertake, at the request of the DMPC, assurance on key priorities and specific issues of concern to the public and PCP
- Approve and review the Mid-Term Financial Strategy (MTFS) in line with Mayoral priorities and
- Monitor progress, delivery and risks against the MPS Business Plan.

ii. The London Crime Reduction Board (LCRB)

At LCRB, the Mayor, DMPC, the Commissioner, representations from across the Criminal Justice Service and London boroughs come together to agree a coordinated approach to crime reduction and community safety in London. High-level intelligence on crime and public concerns about safety is also reviewed. This board is key to utilising the Mayor's convening powers to work with a number of partners to deliver policing and crime priorities within the Police and Crime Plan for London. The structure has been reviewed and now reflects the implementation needed for the new PCP.

iii. Child Protection Policing Oversight Group

MOPAC has now established this group to support and oversee the MPS in their response to the HMIC inspection report on child protection. MOPAC and the Directorate of Audit and Assurance (DARA) have carried out extensive work with the MPS to oversee development of a wide-ranging action plan. As a key part of this detailed plan, the DMPC has established an improvement scrutiny group, which met for the first time on the 7 December 2016. In addition, MOPAC takes a risk based approach to Governance, introducing bespoke oversight mechanisms in response to issues representing a high-level risk. In response to weaknesses identified by MPS, audit and HMIC the remit of this group is to ensure that the MPS respond appropriately and effectively to each of the recommendations set out by Her Majesty's Inspectorate of Constabulary (HMIC).



iv. Knife Crime Strategy Executive Board

MOPAC has also convened further partnership activity and oversight on the delivery of the Mayor's Knife Crime Strategy, which is in place and operational for 2018/19. The DMPC Chairs a Knife Crime Strategy Executive Board with criminal justice service partners, with a number of subgroups to lead specific workstreams. A review is underway to incorporate this structure more closely into the LCRB framework.

v. Bi-laterals

The Mayor routinely meets with the Commissioner and her team, including specialist operations, to discuss policing in London and to be briefed on counter terrorism.

The DMPC and the Commissioner hold regular meetings to provide in depth scrutiny of the effectiveness and efficiency of the MPS and to consider issues of importance to policing and crime reduction in London.

vi. Informal One to Ones

On an informal basis, the DMPC meets regularly with MPS Assistant Commissioners, the Deputy Assistant Commissioners and Commanders and other members of the MPS Management Board.

vii. Justice Matters

Justice Matters is a mechanism whereby the Deputy Mayor brings London partners together in a transparent manner, to problem solve issues for London and bring accountability for those solutions by partners. The meetings are webcast and held in public on a quarterly basis.

Experts in the field are invited to explore different themes from across the spectrum. Areas that have been investigated include Tackling Sexual Violence and Offender Management in London.

viii. Investment Advisory Board (IAB)

IAB is an advisory board to the DMPC, to inform decisions subsequently taken and published. It ensures that MPS investment decisions deliver the police and crime plan and are founded on a sound business case, contributing to efficiency and effectiveness of the MPS. The business case proposals supporting key investments in the MPS transformational change programme are considered at this board.

ix. Corporate Investment Board (CIB)

In addition to the MOPAC governance, as part of the wider GLA corporate governance and to ensure consistency across the GLA, proposed MOPAC investment decisions are reported to the GLA Corporate Investment Board (CIB). The Deputy Mayor for Policing and Crime is a member of this board. The board is an internal forum chaired by the Mayor's Chief of Staff. Further information on and the public minutes of CIB meetings can be accessed here: <https://www.london.gov.uk/about-us/governance-and-spending/good-governance/decision-making>.

External

The Police Reform and Social Responsibility Act 2011 requires the establishment of an ordinary Committee of the Assembly to be the Police and Crime Panel. This function is and will continue to be carried out by the Police and Crime Committee (PCC). MOPAC is scrutinised via the following avenues:

i. Police and Crime Committee

The London Assembly's Police and Crime Committee (PCC) is the statutory body that examines the work of MOPAC and meets twenty times a year. Ten of those meetings are used principally to hold question and answer sessions with the DMPC and Commissioner or their representative. The Committee can require the DMPC and / or staff from MOPAC to attend its meetings for the purpose of giving evidence and provide documents to it.

The Committee also investigates key issues relating to policing and crime in London as part of this scrutiny.

ii. Mayor's Questions

The Mayor's Question Time (MQT) meetings take place ten times a year. Assembly Members as part of their role in holding the Mayor and his functional bodies to account ask the Mayor a range of questions within the remit of his role, which includes policing.

Questions which are not answered at the meeting receive written responses. A number of policing questions are asked of the Mayor during MQT.

iii. Functional Body Question Time

At least once a year, Functional Body Question Time (FBQT) or Plenary sessions on Policing issues are held with the Mayor and the Commissioner. This forms another opportunity for Assembly Members to hold both the Mayor and the Commissioner to account and examine policing matters in London.

iv. Budget and Performance Committee

The London Assembly's Budget and Performance Committee scrutinises the Mayor's budget for the financial year and the implications for services and council taxes in London. It also examines, monitors and reports on the budgets and performance of the GLA and Functional Bodies which includes MOPAC

The Budget Monitoring Sub-Committee, is a Sub-Committee of the Budget and Performance Committee, which considers reports on its behalf. This mainly involves scrutinising the quarterly monitoring reports provided by the GLA and its functional bodies including MOPAC.

v. Oversight Committee

The Greater London Authority (GLA) Oversight Committee is responsible for a range of matters and sometimes examines the work of MOPAC as it pertains to their terms of reference.

APPENDIX 2

Victims Commissioner

On 12th June 2017, Claire Waxman took up the role of London's first independent Victims' Commissioner. The Victims' Commissioner stands up for survivors of crime across the capital, making sure their voice is heard and that their needs are at the heart of our policing and criminal services. As the new Victim's Commissioner, Claire reports directly to the DMPC and plays a significant role in stakeholder engagement and in overseeing the delivery and performance of MOPAC's Victims commissioning service.

Claire works alongside victims, amplifying their voice and promoting their interests throughout the CJS journey with agencies from police to judiciary to ensure the victim's voice is heard and lessons learned from their experiences are used to inform and shape practices, polices, services and provision.

On appointment, Claire launched an ambitious programme of research, engagement and advocacy, including:

- **A wide-ranging consultation with survivors of violence against women and girls, to inform the Mayor's Violence Against Women and Girls Strategy (VAWG).** This included further analysis of the barriers to safe reporting for victims with insecure immigration status which informed a stringent set of recommendations sent to the Home Secretary from the Mayor to increase support and protection.
- **A full victims' needs assessment via an in-depth survey to gather the views and feedback of victims of crime in London** to inform future service provision and ensure all victims can access the support they need. Findings of this will be available Spring 2019.
- **An extensive review into rape cases and justice outcomes in London,** to identify why cases take so long to get to court, why so many victims disengage from the process before the case can be concluded; and a thorough investigation into disclosure practices. Findings will be available Spring 2019.
- **Establishing a Victims Board comprising of justice agencies** which supports the delivery of the commitments set out in the Police and Crime Plan and provides the opportunity for the victims' voice to be at the centre of decision making.
- **Forming a Victims Reference Group for ongoing engagement with stakeholders including victims of crime to inform her work and the work of the Victims Board,** so accessible, high quality, integrated and tailored services are available to enable those affected by crime in London to fully cope and recover. If you are an organisation who wishes to be considered to join please [email us](#).
- **Commissioning a new online resource for victims** to act as a virtual 'one front door' to ensure that victims' can easily access comprehensive information, advice and the pathways available to them when they need it.
- **Convening London's first ever Victims' Summit, bringing together senior leaders from all justice agencies, voluntary and community groups, local councils and victims of crime,** to galvanise a partnership effort to improve victims' experiences of navigating the justice system and support options post incident. We will be convening part two in Spring 2019.

- **Working closely with the Metropolitan Police Service to address recent findings of the decline in victim satisfaction rates,** delivering on a suite of recommendations including 14,000 frontline officers receiving specialist victims care training and improving police correspondence & communication to victims.
- **Working closely with the Ministry of Justice to help shape their Victims' Strategy** and continuing to work with partners to ensure the Government deliver their recommendations outlined in strategy and fulfil their commitment in delivering a Victims' Law.

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Appendix 3

Violence Reduction Unit (VRU)

In response to increasing violence in London, the Mayor announced the formation of the VRU in September 2018. For the remains of the 2018-19 period, MOPAC led efforts to mobilise the new unit. By the end of March 2019, recruitment for the new unit was complete and in early 2019-20 the VRU will be operational.

The VRU is taking a fundamentally different approach to violence reduction – one where the institutions and communities that make up London act together to help identify and address the underlying causes of violence. The Mayor chairs a Partnership Reference Group, to ensure that partner views are at the heart of the VRU's work. The Group met for the first time in October 2018 and met for a total of four times in 2018-19.

The VRU is guided in City Hall with input from the Deputy Mayor of Policing and Crime, the Deputy Mayor for Social Integration, Social Mobility and Community Engagement (DMSI); and the Deputy Mayor for Education and Childcare (DMEC). MOPAC remains legally accountable for the decisions and operations of the VRU insofar as they relate to its' responsibilities. Where decisions relate to MOPAC's responsibilities, the VRU is subject to MOPAC's scheme of delegation and consent. The VRU's permanent staff are employed on MOPAC terms and conditions.

Appendix 4

Independent Panels

i) Audit Panel

In line with the Home Office Financial Management Code of Practice established to support the implementation of the Police Reform and Social Responsibility Act 2011, a joint MOPAC/MPS Audit Panel, performing the functionality of an Audit Committee, was established.

The Audit Panel is responsible for enhancing public trust and confidence in MOPAC and the MPS. It also assists MOPAC in discharging its statutory responsibility to hold the MPS to account. It advises MOPAC and the MPS Commissioner according to good governance principles and provides independent assurance on the adequacy and effectiveness of MOPAC and the MPS internal control environments and risk management frameworks.

The Audit Panel held its first meeting on 31 March 2017. It receives regular reports at its quarterly meeting, including MOPAC governance and risk matters and the respective improvement plans.

MOPAC has responsibility for conducting regular reviews of the effectiveness of the governance framework, including the system of internal audit and the system of internal control. The review is continuous with a programme of reviews of governance policies to ensure they meet the demands and needs of MOPAC. DARA provides assurance on the effectiveness of the MOPAC governance framework and highlight areas for improvement which are reported to senior management. Internal reviews tend to include research into best practice, update of the framework and provision or update of policies and procedures. Changes are subject of a decision and will be published. The effectiveness of the framework is also reviewed in drawing up the Annual Governance Statement.

ii) Ethics Panel

The London Policing Ethics Panel (LPEP) is an advisory panel that is independent of the mayoralty, defines its own work plan and publishes its own findings, that are then sent to the Mayor, Deputy Mayor for Policing and Crime and Commissioner of the MPS.

In March 2018, the new membership of LPEP was announced. Dr Suzanne Shale was announced as the new chair. The Panel will examine the use by the Metropolitan Police of facial recognition technology, and how the MPS prioritise in the face of Government cuts to their budgets.