

TOTAL POLICING

AUDIT PANEL Tuesday, 19 December 2017

Director of Audit, Risk and Assurance Quarterly Activity Report

Report by: Director of Audit, Risk and Assurance, Head of Internal Audit MPS and MOPAC

Report Summary

This report summarises the work carried out by the Directorate of Audit, Risk and Assurance (DARA) in the third quarter of 2017/18 to date, which includes internal audit risk and assurance reviews, systems development and advisory work and counterfraud activity. The detail of work completed is shown in Appendix 1 and 2. There is also a forward look to quarter four planned activity.

Key Considerations for the Panel

- Eleven reviews have been finalised this quarter with a further eight progressed to draft report stage and the plan remains on target to be completed.
- Significant reviews concluded include; Transformation Governance, Preparations for GDPR, End User Systems and key follow ups of; Corporate Assurance Framework, Police Officer Performance Framework and Mobile Devices project.
- Key work on implementing a Control Risk Self Assurance approach within Commercial, Estates and Finance continues in liaison with the Director of Commercial and Finance continued.
- Work and consultation is about to commence in support of drawing up the 2018/19 Internal Audit Plan.

Interdependencies/Cross Cutting Issues

Work has continued with the MPS Governance and Insight Team to improve the oversight and implementation of agreed actions as described in the Audit and Inspection Update. MOPAC and MPS areas of improvement identified in the DARA Annual Report are addressed in the governance improvement plan progress reports submitted to the Panel.

Recommendations

The Audit Panel consider internal audit undertaken and work planned for the fourth quarter, and be assured that adequate progress against the Plan is being made.

The Audit Panel consider potential areas for inclusion in the Plan for 2018/19.

1. Supporting Information

Third Quarter Activity 2017/18 to Date

- 1.1. Eleven reviews have been finalised since the Panel last met, eight progressed to draft report stage and a further five are in progress. Although a number of reviews were deferred at management request the plan remains on target to be completed. Appendix 1 summarises the outcome of the reviews, counterfraud activity and systems development and advisory work undertaken.
- 1.2. Key reviews at draft report stage include; Workforce Capabilities, and Borough Command Unit Reviews focused on partnership arrangements supporting safeguarding activity and follow ups of; Cyber Security and Data Security Assurance. Reviews currently underway include; Transformation Programme Assurance Framework, Knife Crime Strategy and Delivery Framework, MOPAC Operational Oversight and MOPAC Grants and Commissioning.
- 1.3. Management requested four reviews originally planned for the end of the third quarter be deferred to the fourth; Cyber Security Raising Awareness, Alignment and Management of Strategic Risks to the PCP, Decision Making Framework and the Follow Up of Working Time Regulations. The Chief Information Officer also requested the Hosting Migration review be postponed as adequate assurance has been provided via other review activity. The audit of the Organised Crime Group is not now planned as the Command was reviewed in detail as part of a recent HMICFRS inspection.
- 1.4. A major review of procurement and the related governance framework has concluded this quarter. DARA also continue to work with the Director of Finance and Commercial Services and MPS Finance, Procurement and Estates in implementing a CRSA framework to help identify key process risks, key controls and sources of assurance. The initial phase of the Commercial Services exercise has been completed. A joint report by the MPS Director of Commercial and Finance and Director of Audit, Risk and Assurance, on this approach and progress made to date was submitted to the recent meeting of the MPS Risk and Assurance Board.
- 1.5. Contributions and designated pieces of work have been undertaken in support of a number of Gold Groups and key change programmes (Appendix 1 refers). DARA attend the BSS Programme Board with auditors continuing to provide advice supporting the transfer to a single ERP under the SSCL contract. DARA are represented on the DMPC's Child Protection Oversight Group and MPS Child Protection Delivery Board and have provided advice on planned actions to address the issues reported by the HMIC, and in particular on the development of an effective assurance framework. DARA also continue to advise the Criminal Exhibits Diamond Group, Health and Safety Board and Information and Assurance Security Board.
- 1.6. The e-learning anti-bribery and fraud awareness training continues to be rolled out and completed by MPS personnel. The DARA Counter Fraud Unit

maintains regular liaison, formal and informal, with DPS, the MPS Fraud Squad and, when appropriate, outside forces. The National Fraud Initiative exercise has identified overpayments of £185k in respect of twenty eight deceased pensioners. Investigations have been completed and pension payments stopped and overpayments of £158k have been received to date.

1.7. The Director recently chaired the National Police Audit Group Planning Workshop in November attended by Heads of Audit from other PCCs and forces. Topics included discussion on; current emerging risk issues, potential areas for audit coverage and work with the NPCC and College of Policing in developing a governance training module for senior police officers

Fourth Quarter 2017/18 Planned Activity

- 1.8. In the fourth quarter DARA intend to conclude those reviews at draft report and fieldwork stage. Key audits planned include; Business and Financial Planning Framework, Performance Management Framework, Cyber Security Strategy – Promoting Awareness and the joint MOPAC/MPS reviews of the Decision making Framework and Alignment and Management of Strategic Risk to the Police and Crime Plan. Follow up reviews include; Working Time Regulations Compliance Framework, Productivity, Equalities and Inclusion and MOPAC Governance. The planned review of MOPAC Treasury Management will be incorporated as part of a wider external review being conducted on behalf of the GLA under the shared service arrangements.
- 1.9 Further work will also be undertaken to conclude the CRSA initial assessments, and financial systems reviews in liaison with SSCL and External Audit.
- 1.10 Advisory work on the BSS Change Programme will continue and DARA representatives will continue to attend Gold Groups and Boards supporting the work being undertaken to strengthen the MOPAC and MPS governance and internal control frameworks.
- 1.11 DARA is looking to further enhance its engagement with business groups to promote the understanding of the role of internal audit and to facilitate the planning and progress of audit review activity and implementation of agreed actions. MPS key contacts, nominated by Management Board members, have been established across each business area and regular liaison is taking place. A more formal engagement plan is being developed to support the delivery of the 2018/19 work programme.

2018/19 Internal Audit Plan

1.12 Planning for the 2018/19 Audit Plan will be undertaken in consultation with the MPS Management Board members and Head of Risk and Assurance, and the MOPAC Chief Executive and senior management team. In drawing up the plan DARA will take account of Corporate and Directorate level assessment of risk and anticipated inspections by other bodies such as HMIC, external audit and other sources of assurance. The draft plan will be submitted to the Panel in March 2018. Audit Panel members previously indicated they wished to take

this opportunity to consider potential areas for inclusion in the Plan and are invited to do so.

DARA Performance

- 1.13 **Appendix 2** highlights progress against the Plan for quarters one to three to date and summarises the work planned for the fourth quarter. DARA are on course to complete 90% of the Plan to draft report stage by the end of the financial year. A total of 56% of reviews are at report stage, 13% in progress and 31% planned for the remainder of the year.
- 1.14 Audit Productivity is currently at 84% just below the new target of 85% and audit time has been spent broadly as planned.

2. Equality and Diversity Impact

The MOPAC and MPS commitment to equality and diversity are considered in all activities carried out by DARA. The DARA work plan is designed to provide as wide a range of coverage of MOPAC and the MPS as is possible and practicable.

3. Financial Implications

There are no direct financial implications arising from the report. There is a risk of loss, fraud, waste and inefficiency if agreed management actions arising as a result of audit activity are not implemented effectively. Savings and recoveries identified and made as a result of DARA activity enable funds to be better directed towards core policing activities.

4. Legal Implications

There are no direct legal implications arising from the report.

5. Risk Implications

There are no direct risk implications arising from the report. Completion of the audit plan enables the Director of Audit, Risk and Assurance to provide assurance on the effectiveness of risk management arrangements.

6. Contact Details

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7. Appendices and Background Papers

Appendix 1 – Summary of DARA activity Quarter 3Appendix 2 – Quarterly Activity - Reported Outcomes

Risk and Assurance Review Programme (incl. Follow Ups)

Risk & Assurance Review – Final Report	Rating
Operation Filesafe Assurance	Limited
Pay and Conditions	Limited
Healthcare Practitioners – Use and Deployment	Limited
Covert Control Environment – CHIS (Restricted)	Adequate
BCU Review– Child Safeguarding Self-Assurance	Advisory
MOPAC Stakeholder Engagement	Advisory
End User Systems (formerly Legacy Systems)	Limited
Transformation/Change Governance	Adequate
MPS Preparation for Data Protection Change in Legislation – GDPR	Adequate
MOPAC – Preparation for Data Protection Change in Legislation (additional review)	Advisory

Follow Up Review – Final Report	Rating
Firearms Licensing Management and Control	Adequate
Secure Intelligence Systems (Restricted)	Adequate
FALCON – Cyber Crime	Adequate
Offender Management Framework	Adequate
Internal Communications – Workforce Engagement	Adequate
Body Worn Video	Substantial
Performance Management Framework – Senior Police Officers	Adequate
Corporate Assurance Framework	Limited
Mobile Devices Project Governance Framework	Adequate
MIPS Programme Governance	Adequate
Management and Escalation of Programme and Project Risks	Adequate

Risk & Assurance Review - Draft Report	Status
Workforce Capabilities	Draft Report Issued
BCU Reviews – Safeguarding Framework	Draft Report being prepared
CRSA - Procurement Framework	Assessment being Finalised
CRSA - Estates Strategy and Delivery	Assessment being Finalised

Follow Up Reviews – Draft Report	Status
Cyber Security	Draft Report Issued
Data Security Assurance Framework	Draft Report Issued
MOPAC Grants Allocation and Management - including Commissioning Framework Review	Draft Report being prepared
External Training and Development – Implementation of Framework and VfM	Limited

Risk & Assurance Review – In Progress	Status		
MOPAC Operational Oversight	Fieldwork In progress		
Key Financial Systems Assurance	Scoped and Due to Commence		
CRSA Financial Governance	Fieldwork in progress		

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Reviews	Planned	TOL	QIK	4	

Risk & Assurance Reviews – Planned	
Business and Financial Planning Framework	
Performance Management Framework	
Cyber Security Strategy – Promoting Awareness	
Decision Making Framework MOPAC/MPS	
Alignment and Management of Strategic Risks to PCP – MOPAC/	MPS
Leading for London Programme	
Contracts Management Framework	
MOPAC Business Planning and Performance Framework	
MOPAC Financial Oversight	

Risk & Assurance Review – In Progress	Status
Transformation Programme Assurance Framework	Fieldwork in progress
Knife Crime – Strategy and Implementation	Fieldwork in progress

Follow Up Reviews – Planned
Working Time Regulations Compliance Framework
Police Officer Productivity
Equalities and Inclusion – Delivery of Strategy
Police Officer Promotions Framework
Contract Management - SSCL Contract
Contract Management – DP SIAM Towers Model
Savings Plan and Delivery
MOPAC Governance – Regulatory Framework and Transparency
MOPAC Professional Standards/Complaints Oversight
Police Officer Discipline Framework

Systems Development and Change Management – Advisory Work - Quarter 3 to date

BSS Programme Board and Delivery Board

Attended the BSS Programme Board and weekly Delivery and Risk Review Board meetings to advise on the governance arrangements supporting delivery of business support service objectives and on risk and control issues associated with the transition to a single ERP.

Transition to Single ERP SSCL Contract

Key advice provided this quarter included; review of the test plan and programme risk register and final proposals for the self-approval process for expenses, control advice and the provision of volunteers for user acceptance testing during the testing and training phase prior to go-live, attendance at Business Change Workshops and the PSOP Payroll Familiarisation Workshop seeking to ensure the MPS and MOPAC are ready for the PSOP go-live. DARA attend the weekly MyHR Working Group and the bi-weekly Joint Delivery Board meeting. DARA also met with SCCL, Finance colleagues and External Audit to discuss development of an integrated assurance framework post go-live.

Child Protection Gold Group and Delivery Board

Internal Governance Boards have now changed with the introduction of the Safeguarding Board and the Child Protection and Vulnerability Delivery Board. The Child Protection Gold Group has now disbanded and the inaugural meeting of the new delivery board takes place in early December. The remit of the new board is being developed, the DARA role in advising on the governance arrangements supporting the implementation of agreed actions and the wider governance issues relating to Child Safeguarding will continue. This includes advice on the developing assurance framework and work on BCUs to assess the effectiveness of information sharing and partner working in this area.

Strategic Crime Incident Recording Group (SCIRG)

DARA attend the monthly meetings advising on improvements to the governance framework regarding Crime Data Integrity. HMIC are to undertake a Crime Data Integrity Inspection later this year and the MPS is waiting to be advised of the inspection dates. A number of DARA/HMIC previously agreed actions have been implemented this year, although full implementation places reliance on the Met Integrated Policing Solution (MiPs) to improve current technology around crime and incident recording.

MPS Risk and Assurance Board

Attended the Board reporting progress on the internal audit plan for 2017/18 and advising the Management Board on the effectiveness of governance, risk management and assurance arrangements and on key risks/issues emerging from internal audit review activity undertaken.

Information Assurance and Security Board

Advising on security and information management risks and controls, informing the Board of key issues arising from audit activity in this area of the business via the relevant sub-groups. DARA attended the November 2017 Board and discussed progress on MPS GDPR preparedness planning, End User systems and Cyber Security Follow Up.

Corporate Assurance Framework

DARA undertook a follow up review to assess the degree of progress in implementing the actions agreed following the DARA review of the corporate assurance framework. A draft report has been issued and reflects progress made towards the development of an integrated framework. We continue to liaise with and provide advice to our Strategy and Governance colleagues concerning the developing assurance processes and this work will continue during 2017/18.

Control Risk Self Assurance

Systems Development and Change Management – Advisory Work - Quarter 3 to date

DARA continue to work with MPS Finance, Procurement and Estates to develop a Control Risk Self Assurance (CRSA) that will help identify key process risks, key controls and sources of assurance. The initial Commercial Service self-assessment has concluded and a series of meetings, workshops and evaluations have taken place during this quarter and the CRSA will continue to develop during the financial year. This will support the strengthening of the corporate assurance framework and help inform future review activity.

Occupational Health Outsourcing Project Board

Attendance at Board meetings and the provision of advice on the Occupational Health Service Quality Management Assurance programme continues.

Criminal Exhibits Management

The management of criminal exhibits are now a key organisational risk and DARA review activity is informing risk mitigation. DARA attended the Criminal Exhibits Diamond Group established to develop collective strategic support for the business change required to policies, processes and practises governing the management of criminal exhibits. An exhibits retention and disposal policy has been developed and there is a corporate push to dispose of items no longer required to reduce pressure on storage space. Improved technological solutions for monitoring items are also championed by the group.

Health and Safety Board

DARA attended the November 2017 quarterly Board to advise on audits that impact on Health and Safety of Police Staff and Officers. Progress on Working Time Regulations compliance for police staff was discussed and will be subject to a follow up review in Q4, which will be reported to the board.

OFFICIAL Internal Audit Quarterly Activity

Appendix 1

Counter Fraud Programme – Quarter 3 to date

Fraud Prevention Strategy and Training

A new MOPAC/MPS combined counter fraud policy, strategy and response plan has been drafted. In line with other police forces, the document is a joint policy between Police and Crime Commissioners (or Mayor) and the police to provide both MOPAC and MPS staff with counter fraud information in one easily accessible document. It will subsequently be submitted to the joint Audit Panel. Actions from the plan supporting the strategy will be taken forward by the joint Fraud Forum. An update of the fraud risk assessment for the MPS has commenced which will be used to assess potential 2nd and 3rd line defence work in minimising the risks of fraud.

Fraud Investigation

DARA's remit is the investigation of fraud, non-compliance and financial irregularities. The current case load is predominantly focused on financial recoveries, preparation of case papers for court and completing actions to conclude a procurement review. To date this financial year, a total of £189k has been recovered in respect of pension and salary overpayments. In addition, a further £99k, including overpaid redundancy compensations, has been identified for recovery and those cases are currently being assessed for future action. Two further cases for recovery currently await conclusion at court - one for a confiscation hearing, date to be rearranged, and the other for trial at the High Court in December. These two cases involve in the region of £400k fraudulently obtained from the MPS. More recently, and in consultation with Professional Standards, DARA have been reviewing a series of theft/loss of cash from police premises.

Interrogating Key Financial Systems and Data

As the MPS moves towards outsourcing and using the new Police Standard Operating Platform (PSOP) system, DARA has been in liaison with SSCL the Outsourced Supplier to develop management information in relation to monthly payroll outputs. The current SAP system used by the MPS will be closed down shortly and replaced by an Oracle based platform, which will require a new approach to the availability and interrogation of data.

National Fraud Initiative

Further matches, including another deceased pensioner run, have increased the total to 5,517 potential matches. The creditor matches are being reviewed by DARA prior to further liaison with SSCL. Within the 1,001 pension matches, overpayments totalling £185,170 in respect of twenty-eight deceased pensioners have been identified. One was the subject of a police investigation, but has reverted to a civil recovery. Pension payments have been stopped and overpayments of £157,900 received.

2017/18 Risk Based Reviews

Audit Title	Areas of Effective Control	Key Controls for Improvement	Agreed Management Action
Assurance Rating = Ad	•		
		are generally operating effectively, although a r	number of controls need to
	iness objectives are met.		
Transformation/ Change Governance December 2017	 Improved engagement between the Transformation Directorate and Strategy and Governance leading to improved alignment of the transformation portfolio with MPS strategic objectives. Transformation programme objectives integrated into the Business Plan, allowing milestones to be tracked and reported. Mapping exercise linking the OMM Blueprint to the Mayor's Police and Crime Plan 2017-21, demonstrates how improved capabilities will deliver the Mayor's policing commitments and priorities. Framework to ensure strategic value and alignment of projects considers appropriateness of all change initiatives before investment appraisal process. Prioritisation of the Capital Plan aligned to transformation portfolio. Summarised, focused progress reports to Portfolio Investment Board (PIB), with a commentary from the Portfolio Management Group (PMG) on key issues, decisions, matters for escalation and recommended areas for discussion. Good level of oversight of programme plans following the standardisation of programme plans following the standardisation of programme plans following the standardisation of programme plans and a focused review of the portfolio at PIB. 	 governance of investments. Introduce requirement for all projects to conform to the standard set by the Portfolio Office to allow overview of all MPS projects, identification and management of interdependencies and evaluation of the impact of operating multiple projects. Increase clarity and integration in the financial information on capital and revenue expenditure via increased alignment between the management accounting structure and the portfolio structure. Define financial reporting capabilities for improvements in portfolio financial reporting. Development of leadership, culture and behavioural changes to enhance ability and preparedness of the MPS to cope with the level of business change. Increased reporting on the impact on 	18 actions have been agreed to address the 2 high and 5 medium risks, with a target implementation date of September 2018.

Audit Title	Areas of Effective Control	Key Controls for Improvement	Agreed Management Action
MPS Preparation for Data Protection Changes – General Data Protection Legislation (GDPR)/Law December 2017	 Regular GDPR workshops review progress of the Data Protection Reform Police Service Implementation Plan. GDPR preparedness a standing item at monthly meetings chaired by AC Professionalism as the Senior Information Responsible Officer (SIRO). MiPS Outline Business Case approved October 2017 and once implemented from 2019/2020 will deliver integration and demonstrate compliance with GDPR/LED and MoPI for critical systems. Long term, Information Futures project will improve the management and storage of data resulting in greater data protection compliance. Information Asset Register (IAR) being developed to identify all relevant information systems and their Information Asset Owners (IAOs) with specific obligations under GDPR. Compliance will be monitored. MPS engaging with National Police Chiefs Council and National Counter Terrorism Police Headquarters (NCTPHQ) on data protection reform to identify SIRO responsibilities and obligations within law enforcement as data controllers. Operational notice on GDPR issued to MPS staff and officers, reinforced by further awareness information issued by the IAU. Assessment of a data maturity model to benchmark current data management activities against the One Met Model (OMM) transformational objectives. 	 Implementation of the IMS for long term compliance and mitigation of existing exposure and vulnerabilities to ensure full compliance by May 2018 in relation to GDPR/LED or MoPI. Implementation of MiPs and Information Futures to ensure compliance with legislation. Sufficient resources to allow timely responses to FOI and Subject Access Requests in accordance with relevant legislation. Updated ICT to deal with management of correspondence within the reduced time scales introduced under GDPR. Maintenance of continuity of leadership of the Data Protection Reform Police Service Implementation Plan to ensure delivery prior to GDPR implementation. 	Four high priority management actions have been agreed, with

Audit Title	Areas of Effective Control	Key Controls for Improvement	Agreed Management Action
Assurance Rating = Lin The control framework business objectives.		isks. A number of key controls are absent or	are not being applied to meet
Management of End User Systems (EUS) December 2017	 Strategic approach contained in Digital Policing Strategy 2017-2020, benchmarks EUS governance requirements. Continuing development of collection and monitoring of information to provide clear picture of potential vulnerabilities. Agreement for collaboration between business groups to develop Systems of Record covering relevant MPS IS/IT. 	 oversight and procurement frameworks for the development and maintenance of IS/IT. Availability of information on life cycle of EUS to enable planning for replacement. Effective oversight and governance to ensure compliance with data protection legislation 	Four high risk and three medium risk management actions were agreed.

Interim Audits – Follow Up Reviews

Audit Title	Areas of Improved Control	Continuing Areas for Improvement	Management Action and Progress		
Assurance Rating = Substantial There is a sound framework of control operating effectively to mitigate key risks, which is contributing to the achievement of business objectives.					
Body Worn Video (BWV) October 2017	 Action taken to address possibility of loss of footage. Accreditation for the Microsoft Azure Cloud meets the requirement of Police Approved Secure Facility (PASF) accreditation. Progress in development of dashboards to monitor use and deployment of the BWV, completion expected October 2017. Significant reduction in police complaints and positive feedback from the Public Attitude Survey. Review of BWV benefits being undertaken to demonstrate effectiveness against baselines to report at year end. 	 Sign off of the new Service Level Agreement (SLA) and policy on SecureShare. 	Of the four medium risk agreed management actions, two have been fully implemented, one partly implemented and one remains outstanding. The revised target date for implementation is March 2018.		
Assurance Rating = Ad	•				
	is adequate and controls to mitigate key rising the set of the set	ks are generally operating effectively, although	a number of controls need to		
Mobile Devices	Review and alignment of resources to	Revision of Smarter Working Programme	Of the five medium risk agreed		
Project Governance	support delivery of Smarter Working	Board terms of reference to reflect new	management actions, one has		
Framework	Programme plan.	Smarter Working Strategic Outline Case approved July 2017 an interdependencies.	been fully implemented, two partly implemented and two		
November 2017	 Clearly defined business change plan for the Smarter Working Programme. Smarter Working Programme supported by guidance and tools available to officers and staff via the MPS intranet. Implementation of communications plan, raising awareness via posters and campaigns. Smarter Working Communication Strategy produced August 2017 reflecting new 	 Definition and alignment of the interdependencies and accountabilities between Smarter Working Programme and the Mobile Devices Project with a clear distinction between business and technology remits and respective accountabilities. Clarification of overall governance arrangements and management of interdependencies. Integration between key programmes to 	remain outstanding. The revised target date for implementation is March 2018.		

Audit Title	Areas of Improved Control	Continuing Areas for Improvement	Management Action and Progress
	Strategic Outline Case and aligning the Mobile Devices Project.	 enable realisation intended benefits. Completion of reviews on:- programme governance; programme documentation; dependencies; benefits realisation. 	
MIPS Programme (Part of Transformation Governance) December 2017	 Assurance review of the project led by an independent review team in April 2017. An action plan put into place and follow up conducted. Project is reporting it is now on track to deliver in December 2020, three months behind schedule and to re-profiled costs Programme oversight by the MPS and MOPAC. 	 Reduction of delays in the MiPS project in meeting baseline targets. Completion of action plan to resolve issues and progress the project to full business case stage including full resource complement. Preparation of full details and estimates of overall cashable benefits. Maintain level of programme oversight by the MPS and MOPAC to assure key aspects of the Final Business Case do not deviate from the re-purposed Outline Business Case. 	Transformation Governance review refers.
Management of Programme and Project Risks (Part of Transformation Governance Review) December 2017	 Continued development of portfolio risk management processes, with portfolio level risks refreshed and aligned to strategic objectives. 	 Promote good practice in portfolio risk at project level to ensure that consistent and corporately aligned risk management practices are operating. 	Transformation Governance review refers.
Performance Management Framework – Senior Police Officers December 2017	 Clearly defined Performance and Potential Matrix (PPM) guidance. Work in progress to strengthen the PPM process, subject to review by independent facilitator. Independent facilitator sits on the moderation panel to provide challenge and ensure the process is operating effectively. Performance dashboard being developed to track police officers assessed as high performing and ensure effective monitoring of progression. 	 Clear process for monitoring and managing high performing officers including an implementation plan with milestones, timescales, achievements and identified risks. Consistent completion of the PPM form, and scoring to enable full assessment of performance and address inconsistencies. Effective IT solutions to assess, track and monitor the PPM process. 	There were 13 agreed management actions. Of the four high risk, two have been fully implemented and two remain outstanding. Four of the nine medium risk actions have been fully implemented, four partly, and one remains outstanding The revised target date for implementation is March 2018.

Audit Title	Areas of Improved Control	Continuing Areas for Improvement	Management Action and Progress		
Assurance Rating = Limited The control framework is not operating effectively to mitigate key risks. A number of key controls are absent or are not being applied to meet business objectives.					
External Training and Development – Implementation of Framework and VfM December 2017	 A 'How2Buy' guide on standard requirements and project developed and communicated to business groups and will be made available on the intranet once approved. Workshops and meetings across the Met reinforcing roles and responsibilities of those involved in the external training process. Regular meetings to discuss the external training process and key issues faced by the MPS. 	 implementation plan to provide a strategic framework for evaluating the need for and effectiveness of external training. Availability of procedures supporting the commissioning and management of external training. Defined relationship between Strategic Learning, Commercial Services and Business Groups to facilitate the effective 	management actions, three have been partly implemented and three remain outstanding.		

Audit Title	Areas of Improved Control	Continuing Areas for Improvement	Management Action and Progress
Corporate Assurance Framework December 2017	 Development of strategic business plan which, together with the Governance Improvement Plan and Annual Governance Statement, recognises the need for an integrated assurance framework. Pockets of assurance activity exist at Level 2 and others are developing including the Portfolio Assurance Framework. 	plan, with appropriate milestones and deliverables, to progress MPS assurance framework.Sufficient resources to achieve the	The one high risk agreed management action has been partly implemented. Of the six medium risk management actions, three have been partly implemented and three remain outstanding.