



**METROPOLITAN  
POLICE**

TOTAL POLICING

**M O P A C**

**MAYOR OF LONDON**  
OFFICE FOR POLICING AND CRIME

## **AUDIT PANEL**

### **Friday, 30 June 2017**

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## **Met Annual Governance Statement 2016/17**

Report by: The Deputy Commissioner

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### **Report Summary**

#### ***Overall Summary of the Purpose of the Report***

This report sets out the process for developing the Met's Code of Governance and Annual Governance Statement (AGS) for 2016/17. It highlights a number of focus areas for improvement throughout 2017/18 and invites Panel members to comment on the code and AGS in advance of final approval by the Met's Management Board.

#### ***Key Considerations for the Panel***

- Governance improvement areas are identified from analysis of Statements of Internal Control signed by all management board members and heads of units and analysis of audit, inspection and risk information.
- Eight focus areas have been identified for improvement in 2017/18 which cover: our strategic vision and planning; decision making and delegations; performance management; capability, training and development; commercial, collaborative and strategic partnerships; the assurance framework; community engagement and public confidence; information management.
- Action plans are currently being developed by leads for each area.

#### ***Interdependencies/Cross Cutting Issues***

- The governance improvement areas identified in this report will form the basis of a new governance risk reported in the Met's risk management report.
- Our work on business planning set out in the Met's business planning paper will be a significant step to improve strategic vision and planning (one of our identified improvement areas).
- The Met's AGS should also be considered alongside MOPAC's AGS (although both organisations are now corporations sole) and our internal auditor's opinion (pending at time of writing of this report).

### **Recommendations**

The Audit Panel is recommended to:

- a. review the Met's Code of Governance and 2016/17 AGS and comment on these prior to being authorised by the Met's Management Board.

## 1. Supporting Information

- 1.1. At the end of each financial year the Met has a statutory obligation to produce an Annual Governance Statement (AGS) which explores governance processes and procedures that enable the Met to carry out its functions effectively. The unaudited AGS for 2016/17 and Met's Code of Governance was published alongside the statutory accounts on 13 June 2017.
- 1.2. The Code of Governance sets out the Met's governance controls (how we do governance). The AGS sets out continuous improvements to our governance throughout 2016/17 and proposed improvements for 2017/18 in line with the CIPFA/SOLACE Delivering Good Governance in Local Government Framework (April 2016) and Guidance for Policing Bodies in England and Wales (July 2016).
- 1.3. THE AGS is based on an annual review of the Met's governance framework where 14 governance areas are explored with senior leads responsible for these areas. In addition Management Board members sign Statements of Internal Control in which they consider a number of governance standards for business areas under their direct supervision during 2016/17. The Statements ask members to clarify the extent to which they are satisfied that key processes and internal controls in their area of responsibility are operating effectively.
- 1.4. In drafting the 2016/17 AGS we have examined assurances provided by individual Management Board members in their Statement of Internal Control, considered relevant external audit testing and DARA audits, and Met risk and assurance activity in 2016/17. The Chief Financial Officer (CFO) has performed an annual review of financial assurance activity against a seven pillars model. Reliance will also be placed on the DARA audit opinion 2016/17 and Cabinet Office Assurance both pending at time of writing this report.
- 1.5. The draft AGS has been shared with Management Board members for comment and improvement areas were discussed and agreed at the Met's Risk & Assurance Board on 06 June 2017. The AGS has also been shared with MOPAC and discussed with DARA, comments have been incorporated into the published draft.

### Improvement Areas

- 1.6. Whilst we will ensure continuous improvement in all 14 of our governance areas, the findings from the review have enabled us to highlight eight focus areas for improvement throughout 2017/18. Detailed action plans including key milestones and accountabilities and timelines for the delivery of these are being developed by lead officers for each area.
- 1.7. The improvement areas are:
  - Strategic vision and planning  
Lead: Director of Strategy & Governance
  - Decision making processes and delegation

- Lead: Director of Strategy & Governance
- Performance management  
Lead: Director of Information and Insight
- Capability, Training and Development  
Lead: AC Professionalism
- Commercial, collaborative and strategic partnerships  
Lead: Director of Finance & Commercial /Director of Strategy & Governance
- Assurance Framework  
Lead: Director of Strategy & Governance
- Community engagement and public confidence  
Lead: AC Territorial Policing
- Information management  
Lead: AC Professionalism

- 1.8. Subject to the Commissioner's approval, the audited AGS will be authorised by Board in July 2017 and signed by the Deputy Commissioner and Chief Financial Officer to provide for consistent governance of the internal control environment and financial stewardship over the full financial year 2016/17. The audited AGS is due to be published with the Statement of Accounts on Thursday 20th July 2017.
- 1.9. The Audit Panel is invited to review the Met's Code of Governance and AGS and comment on these. Any amendments will be made prior to the AGS being authorised by the Board.
- 1.10. Reporting will take place to Joint Audit Panel throughout 2017/18 on progress to deliver against action plans.

**Action from March Audit Panel**

- 1.11. At the March meeting members asked for an update on activity to address the management of strategic partnerships. In the last quarter the Director of Strategy & Governance has been appointed as a lead for this area. Strategic partnerships has also been identified as a governance improvement area for 2017/18 and a detailed action plan is now in development. This will include:
- An overview of our approach to partnerships – how we work in partnership to deliver a 21st century police service;
  - The principles of how we manage partnerships (including what we want / need from partners);
  - A list of key partnerships and the Met lead;
  - Risk to effective partnership working;
  - Areas of focus for 17/18.

**2. Equality and Diversity Impact**

The model of corporate governance used by the Met is based on the principles of openness; integrity; accountability and equality. The development of the corporate governance framework through areas identified for significant improvement should have a positive diversity impact by ensuring that these principles continue to inform the way in which the Met operates.

### 3. **Financial Implications**

It is anticipated that the costs associated with the areas of work identified in this report will be met from the relevant unit's staff and officer budgets. Any funding required over and above these existing budgets will be subject to the normal MOPAC/Met governance approval and planning processes.

### 4. **Legal Implications**

The Mayor's Office for Policing and Crime (MOPAC) and the Commissioner of Police of the Metropolis (the Commissioner) are relevant bodies under Schedule 2 of the Audit Commission Act 1998 for the purpose of the Accounts being subject to audit. Both are under a statutory duty to approve an Annual Governance Statement (AGS) that has been prepared in accordance with proper practices in relation to internal control through members of the body meeting or as a whole or by a committee, under regulation 6 of the Accounts & Audit (England & Wales) Regulations 2015.

In order that MOPAC and the Commissioner can discharge the statutory duty referred to above, the Met provides its certification to the MOPAC by submitting an Annual Governance Statement (AGS), as recommended by CIPFA / SOLACE guidance "Delivering Good Governance in Local Government: Framework (2016)" ("The Framework") and CIPFA Guidance Notes for Police Bodies in England and Wales (2016)" ("The Guidance"), which demonstrates how aspects of governance have been implemented within the police force.

The corporate governance framework provides the supporting information which evidences that the Met will ensure it has robust systems in place that demonstrate it is adhering to the strategic direction set by the Commissioner, and is delivering good governance through the delivery of many operational and financial aspects within a delegated framework, in accordance with Guidance and best practice.

Compliance with the governance framework will also assist in raising standards, reduce risk of legal challenge and build public confidence by ensuring the Met operates in a transparent manner.

### 5. **Risk Implications**

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

### 6. **Contact Details**

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### 7. **Appendices and Background Papers**

**Appendix 1** – 2016/17 Annual Governance Statement  
**Appendix 2** – Met's Code of Governance



## **Annual Governance Statement** of the **Commissioner of Police of the Metropolis**

**Unaudited** position as at 31 March 2017  
including plans for the financial year 2017/18.

The Metropolitan Police Service (Met) conducts an annual review of the effectiveness of its system of internal control and publishes a statutory Annual Governance Statement (AGS) with the Met's Statement of Accounts. This AGS reports publicly on compliance with the Local Code of Governance and aims to provide assurance that the Met is monitoring and managing governance arrangements set out in the Code effectively. This AGS further outlines how the Met will make improvements to its governance in the forthcoming year and takes into account the opinions of the Met's internal and external auditors.

The Met's Local Code of Governance (Code) sets out the governance structure, processes and procedures in place to enable the Metropolitan Police Service to carry out its functions effectively. It is framed within the CIPFA/SOLACE Framework 2016 with due regard to the Met's operating environment. The overall aim is to ensure that resources are directed in accordance with agreed policy and priorities, that there is sound and inclusive decision-making and that there is clear accountability for the use of resources to achieve desired outcomes for our Communities.

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## **A. Scope of responsibilities**

The Commissioner of Police of the Metropolis (CPM) is responsible for maintaining the Queen's peace and has direction and control over the officers and staff operating within the Metropolitan Police Service (Met). The CPM holds office under the Crown and is appointed by the Queen on the recommendation of the Home Secretary having regard to any recommendations by the Mayor's Office for Policing and Crime (MOPAC).

The CPM is accountable in law for the exercise of policing powers and to MOPAC for the delivery of efficient and effective policing, management of resources and expenditure by the Met. At all times the CPM, her constables and her staff remain operationally independent in the service of the public. In discharging her overall responsibilities the CPM is responsible for establishing and maintaining appropriate risk management processes and governance arrangements, and for ensuring that there is a sound system of internal control which facilitates the effective exercise of these functions. This is captured in the Met's Local Code of Governance (Code).

The CPM as an independent legal entity or corporation sole, with direction and control of the force and responsibility for delivering operational policing, is legally required to produce an Annual Governance Statement (AGS). The Statement helps MOPAC to hold the CPM to account for efficient and effective policing. The AGS sits alongside the statutory accounts for the Met and gives assurance in respect of the Met's governance arrangements and compliance with the Code. MOPAC produces its own Governance Statement.

Under s.35 of the Police Reform and Social Responsibility Act 2011 in exercising their functions the CPM must ensure that good value for money is obtained. Further s.38 of the Policing and Crime Act 2017 enables chief officers to make the most efficient and effective use of their workforce by giving them the flexibility to confer a wider range of powers on police staff and volunteers (while for the first time specifying a core list of powers that may only be exercised by warranted police officers).

The CPM is required to appoint a professionally qualified Chief Financial Officer (CFO) for the Met. Under the Police Reform and Social Responsibility Act 2011 the CFO has a personal fiduciary duty by virtue of their appointment as the person responsible for the proper financial administration of the Met. This includes requirements and formal powers to safeguard lawfulness and propriety in expenditure (Section 114 of the Local Government Act 1988 as amended by paragraph 188 of Schedule 16 to the Police Reform and Social Responsibility Act 2011 ("2011 Act")).

The statutory responsibilities of the CFO are held by the Director of Commercial and Finance who is a member of the Management Board. Throughout the year the CFO was involved in, and able to bring influence to bear on, all material business decisions in line with the CIPFA "Statement on the role of the Chief Finance Officer (CFO)". The CFO leads the promotion and delivery by the CPM of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently and effectively. This requires that the finance function is resourced to be fit for purpose and appropriate management accounting systems, functions and internal controls are in place such that finances are kept under review on a regular basis.

## **B. Met strategy and challenges**

The Met Police is responsible for maintaining the peace and is accountable in law for the exercise of policing powers, and to the Mayor's Office for Policing and Crime (MOPAC) for the delivery of efficient and effective policing, management of resources and expenditure. At all times the Commissioner and her officers remain operationally independent in the service of the public.

The Met polices a unique capital city environment. London's resident population is the largest it has ever been at c8.7 million residents, and is projected to reach c10 million by 2036. Londoners are, on average, younger than the rest of the UK and more diverse with 270 nationalities and over 300 languages spoken. 3.1 million Londoners were born abroad, with just under half having arrived in the UK in the last 10 years. London is also the world's most popular business and travel destination, hosting about 31.5 million visits each year from all over the world (2015).

The Mayor is responsible for overseeing and setting the strategic direction of the Met. The Deputy Mayor for Policing and Crime holds the Met to account for delivering against the priorities of the Police and Crime Plan. MOPAC's 2017-21 Plan sets signal priorities for policing London including keeping children and young people safe; standing together against extremism, hatred and violence; and tackling violence against women and girls. The MPS Business Plan 2017/18 sets out the Met's contribution to the delivery of these priorities and plans for operational policing to:

### **Make every community in London safer**

#### **Make London safer**

#### **Build a transformed, efficient and modern Met**

This Business Plan will be delivered through four operational Business Groups and our headquarters MetHQ.

- **MetHQ** provides strategic services covering Strategy and Governance, People and Change, Commercial and Finance, Legal, Media and Communications and Digital Policing.
- **Territorial Policing (TP)**: Responsible for day-to-day local policing across London. TP deals with 24 hour emergency response, local investigations, protecting vulnerable people and neighbourhood policing. Whilst mostly organised geographically in borough units, it includes some centralised teams such as the Roads Transport Policing Command, Met Detention, Met Prosecutions, the Metropolitan Special Constabulary and Metropolitan Police Volunteers.
- **Specialist Crime and Operations (SC&O)**: Linking in with local policing and responsible for specialist policing services including gangs, serious and organised crime; homicide; rape and serious sexual offences, exploitation and child abuse; and public order. It also supports operations across the organisation through intelligence, the central communications command MetCC, the specialist firearms command and the pan-London taskforce.
- **Specialist Operations (SO)**: Responsible for the security and protection of London from terrorism, extremism or subversion. Operations are delivered across London and on a national and international level. SO includes SO15 Counter Terrorism Command, the Security Commands (such as aviation) and the Protection Commands (such as Royalty).
- **Professionalism (DPS)**: Responsible for ensuring that the Met's officers and staff operate ethically and to the highest professional standards, and for the provision of training to officers and staff across the organisation.

## **Change programme**

The One Met Model 2020 (OMM 2020) aims to transform the organisation and focus resources on priority areas whilst providing an effective universal service to all Londoners. The twelve strategic change programmes will be delivered in four broad tranches in 2017/18.

The first tranche (early 2016 to June 2017) is delivering *commitments and pathfinders*. High profile initiatives such as Body-worn video, an uplift in armed response capability and an improved internet platform with more self-service will improve our transparency and our ability to protect London. We are simultaneously testing changes such as a new Basic Command Unit structure, trialling crime reporting through social media and piloting smarter ways of working.

A second tranche '*Fit for the Future*' throughout 2017 will ensure that we have processes, systems and relationships to provide fit for purpose corporate functions. These enabling changes include a new operating platform with streamlined policies across HR, Finance and procurement, Wi-Fi across all our buildings, secure platforms for mobile devices and an increase in digital capability.

The third tranche '*Strengthening local policing*' will be implemented from June 2017 to April 2018 with visible public impact. This includes increased online services to prevent and report crime; dedicated local officers equipped with mobile devices to enable faster response and a single point of contact for investigations; more effective 'borderless' responses and streamlined leadership.

A fourth tranche of changes is in design for implementation in early 2018 around the *transformation of victim services*, covering intelligence, investigation, prosecutions, custody and forensic services. These programmes will fully reflect the financial reality in savings and investment required.

## **Financial challenges**

The Mayor's Police and Crime Plan highlights the severe budgetary pressure facing the Met.

The November 2015 spending review protected Police funding in cash terms between 2016/17 and 2019/20 if precept funding is increased to the referendum limit. This moderated the Met's savings requirement, driven by inflation levels for pay and non-pay costs, statutory changes affecting national insurance payments and provisions for in-year budget pressures (such as the increase in firearms capability). We have made £600m of savings between 2010 and 2015 and are working to meet the requirement to save an extra £443m over the period 2016/17 to 2020/21.

In order to deliver required savings a financial strategy was developed with the aim of reducing the back office to c15% of gross revenue expenditure, to drive out efficiency savings across the Met, and to employ capital receipts to invest in buildings and IT. The strategy was aligned to the Met's operational blueprint with plans to generate identified savings of £131m over the next four years on top of £127m required to balance the budget in 2016/17. This leaves remaining unidentified savings of c£185m over the period to 2020/21. However options for future back office savings are limited.

## **Crime and Confidence**

Reported volume crimes, such as burglary or vehicle theft, decreased steadily to mid-2015 with a small overall rise in 2016/17. There have been increases in high harm and violent crimes, including recorded lethal barrelled firearms discharges, sexual violence, rape offences and child abuse reporting, and levels of youth re-offending. Many crimes now are less likely to occur in public places and more likely to be in people's homes. We are focused on preventing and tackling these, on protecting vulnerable victims and repeat victims, and on improving sanction detection levels.

We constantly review our approach to, and skills and capabilities in, tackling new and emerging threats such as modern slavery, human trafficking and social media, hate crime or cyber-crime. Many investigations, such as missing persons or harassment, include online and digital elements.

Our Crime Control Strategy develops an assessment of risks to London's safety. Risk is assessed against Threat, Vulnerability and Harm to inform our operational response. Priorities highlighted for 2017 include child sexual exploitation; serious sex offences including rape; drugs, firearms, gangs and knives; serious and organised crime; and terrorism. Additionally, the National Crime Agency (NCA) National Strategic Assessment highlights organised immigration crime, cyber-crime and high-end money laundering as national threats.

At December 2016, 69 per cent of Londoners think that the Met is doing a good job in their area, and 90 per cent of victims are satisfied<sup>1</sup>. Confidence in local policing increased 5 per cent in the last four years, whilst confidence in London-wide policing rose 13 per cent. We intend to reinforce this trend through strengthened neighbourhood engagement, a renewed focus on supporting victims, and maintaining the highest standards of professionalism.

### **C. The Governance Framework**

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

This statement explains how the Commissioner of Police of the Metropolis has complied with the Code for the financial year 2016/17 and meets the requirements of section 6 of the Accounts and Audit Regulations (England and Wales) 2015 in relation to the publication of a statement on internal control.

In adopting this framework the Met fully accepts that:

**Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.**

Achieving good governance in the Met requires effective arrangements for:

- Defining outcomes in terms of sustainable economic, social and environmental benefits.
- Determining the interventions necessary to optimise the achievement of intended outcomes.
- Developing the Met's capacity, including the capability of its leadership and the individuals within it.
- Managing risks and performance through robust internal control and strong public financial management.
- Implementing good practices in transparency, reporting, and audit to deliver effective accountability.

**The fundamental function of good governance in the public sector is to ensure that entities achieve their intended outcomes while acting in the public interest at all times.**

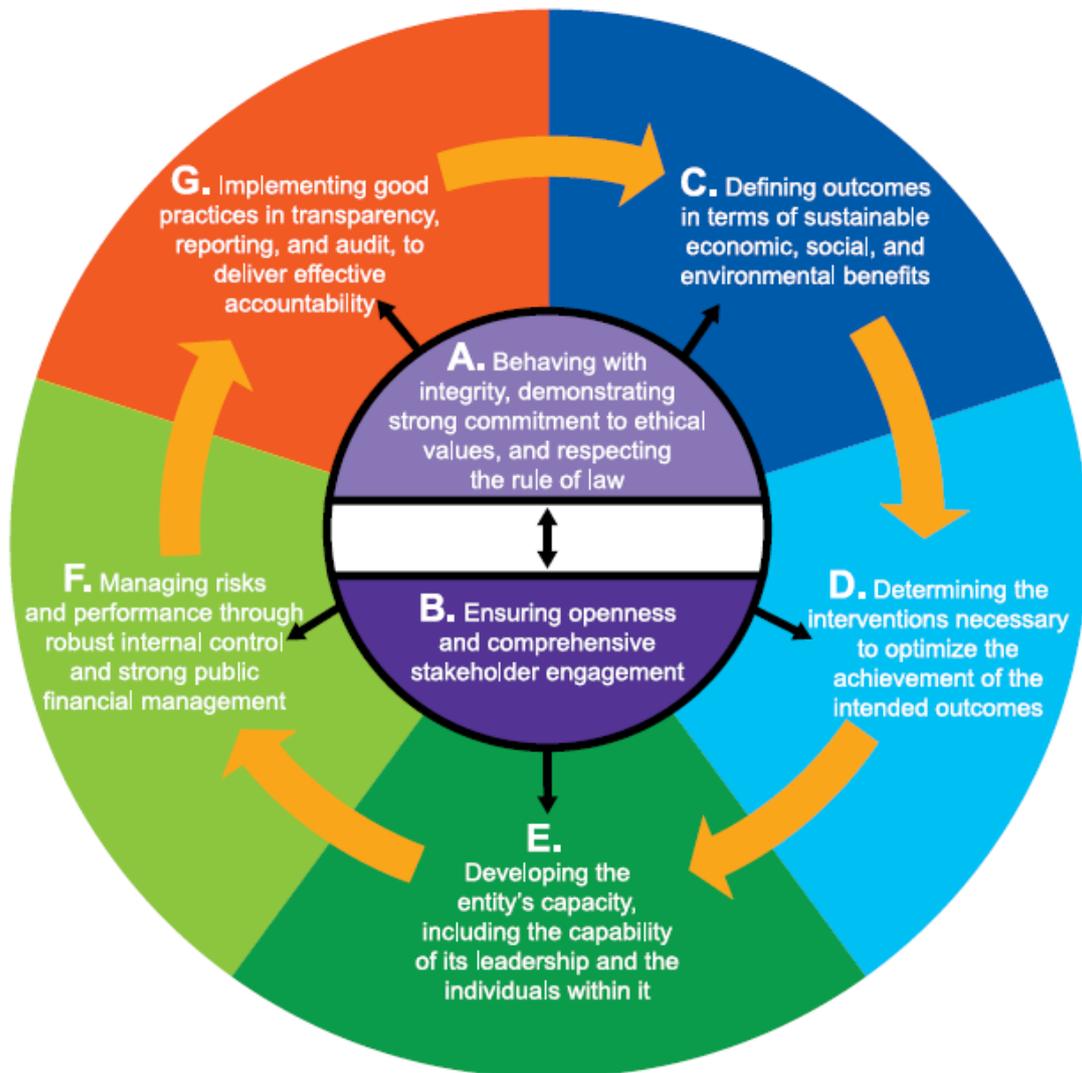
Acting in the public interest requires:

- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law.
- Ensuring openness and comprehensive stakeholder engagement.

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<sup>1</sup> Source HMIC PEEL 2016 Legitimacy report

## Achieving the Intended Outcomes While Acting in the Public Interest at all Times



CIPFA/IFAC 2014

### Met governance model

The Met governance model focuses on recognised frameworks, processes and internal controls that enable the Met to meet strategic objectives and manage challenges. These include:

- Strategic objectives and outcomes
- Strategic planning framework
- Decision-making structures & processes
- Financial governance
- Risk Management
- Performance framework
- Assurance framework
- Change governance
- Capability and Skills
- Standards of behaviour
- Stakeholder engagement
- Legal and regulatory compliance

Not Protectively Marked

In developing the Code and this Statement fourteen key areas of governance have been identified and explored as part of our annual review of effectiveness for 2016/17. These are:

<b>Defining outcomes in terms of sustainable economic, social and environmental benefits</b>	
1	Processes for setting the objectives and targets that support the MOPAC Police and Crime Plan 2017-21 policing priorities, and for defining strategic issues facing the Met.
2	A strategic planning framework for establishing and scheduling operational priorities, finance and resource allocations, transformational change and our roadmap to delivery.
<b>Determining the interventions necessary to achieve the intended outcomes</b>	
3	Decision-making structures and processes that direct and control activity to achieve strategic outcomes and to deliver on strategic plans.
4	Monitoring processes by which performance against operational, financial, change and other strategic plans are considered and key issues identified and tasked.
<b>Developing the Met's capacity, including the capability of its leadership and of individuals in it</b>	
5	Means to identify and meet the development needs of officers and staff in relation to their roles, aligned to Met priorities and supported by training and learning opportunities.
6	Appropriate governance of commercial contracts, partnerships, research relationships and other collaborative working to improve delivery of plans, priorities and outcomes.
<b>Managing risks and performance through robust internal control and strong public financial management</b>	
7	The risk management processes by which the Met identifies and seeks to prevent and mitigate key risks.
8	Effective financial stewardship and financial controls including financial instructions, a scheme of delegation and supporting instruments which define means to manage risks, support service delivery and achieve value for money.
<b>Implementing good practices in transparency, reporting, and audit to deliver effective accountability</b>	
9	Audit and assurance processes by which the Met ensures accountability and assures Management Board, MOPAC and the public that controls are working adequately.
10	Processes for investigating complaints from the public, for identifying potential fraud or misconduct and for reporting against audit, inspection and other recommendations.
<b>Ensuring openness and comprehensive stakeholder engagement</b>	
11	Establishing clear channels of communication and engaging with all sections of the community and stakeholders on priorities, plans and policing activity.
12	Processes for publicising performance, financial and other information and for meeting Freedom of Information and public requests whilst assuring information security.
<b>Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law</b>	
13	Ensuring familiarity and compliance with relevant laws and regulations, internal policies and procedures, and ensuring that activity and expenditure is lawful.
14	Developing, communicating and embedding ethical standards, codes of conduct and defining the standards of behaviour for officers and staff.

### **Annual review of effectiveness**

The Met is responsible for conducting, at least annually, a review of the effectiveness of its system of internal control and so of its governance framework and compliance with its Code. This is undertaken between February and May when governance areas are explored with senior leaders.

Management Board members and their extended command leads have, for the 2016/17 fiscal year, been required to consider and authorise a Statement of Internal Control for business areas under their direct supervision. These Statements clarify the extent to which members are satisfied that key processes and internal controls in their area of responsibility operate effectively. This information informs this Annual Governance Statement, notably the governance improvement plan 2017/18.

The review of the effectiveness of the Met governance framework is also informed by regular reporting on operational and financial performance to Management Board and through a corporate risk register which details key business risks and the controls in place to manage these. The review is further informed by internal and external review undertaken across the Met including by Her Majesty's Inspectorate of Constabularies (HMIC), our external auditor Grant Thornton LLP, and our internal auditor the Directorate of Audit Risk & Assurance (DARA).

### **Annual Governance Statement**

This statement has been prepared for the 2016/17 financial year. It sets out the Met's current governance arrangements, reports on their effectiveness during the year and outlines future actions planned to improve governance for 2017/18.

The detailed controls outlined below represent those at 31 March 2017 and up to the date of approval of the Statement of Accounts and, subject to the areas identified for improvement, accord with proper practice. These have been informed by the work of senior officers and staff across the Met who have responsibility for the development and maintenance of the governance environment, and in response to the opinion of the Director of Audit Risk and Assurance.

The Director of Audit, Risk and Assurance's (DARA) audit opinion for 2016/17 is anticipated by the end of June 2017.

Controls for the fourteen key areas outlined above for 2016/17 are reported in section D. The **eight** improvement areas identified for 2017/18 are reported in section E.

## **D. Review of Met governance**

### **1. Processes for setting objectives and targets that support MOPAC's Police and Crime Plan (2017-21) policing priorities, and for defining strategic issues facing the Met.**

#### *Activity during 2016/17:*

The Met continued to focus on achieving the Mayor's 20/20/20 objectives until May 2016 and on our broader responsibilities outlined in the Strategic Policing Requirement. Simultaneously we focused on transforming the organisation to deliver a more efficient and effective police service through our One Met Model 2020 (OMM). This has been informed by our understanding of the future operating environment for policing London, including the GLA's London Landscape analysis, with a particular focus on evaluating demand and the impact of our service on our stakeholders.

Since May 2016 the Met has been working with MOPAC to develop a new Police & Crime Plan that sets out strategic outcomes and objectives for 2017-21. The Met has supplied MOPAC with information on the key deliverables of the OMM and the Met Management Board's strategic intent. This has been incorporated into the published Police & Crime Plan 2017-21.

In parallel the Met has been developing its own Business Plan covering 2017/18, setting out how it will support the strategic priorities of the MOPAC Plan and deliver operational policing with more specific objectives and milestones for 2017/18. The Met Business Plan will be reviewed annually in conjunction with the budget cycle and will outline the key activities that the Met will undertake and its policing contribution to the strategic outcomes set by the Mayor.

#### *Intended activity over the next year:*

Following publication of the final Police & Crime Plan and the Met Business Plan MOPAC envisage a series of delivery plans being developed between themselves, the police and other partners to clearly identify activities required to deliver the Plan. We will work to ensure that these delivery plans fully reflect the Met's key activities to deliver Mayoral outcomes.

[https://www.london.gov.uk/sites/default/files/mopac\\_police\\_and\\_crime\\_plan\\_2017-2021.pdf](https://www.london.gov.uk/sites/default/files/mopac_police_and_crime_plan_2017-2021.pdf)

### **2. A strategic planning framework for establishing and scheduling operational priorities, finance and resource allocations, transformational change and our roadmap to delivery.**

#### **Met Business Plan**

##### *Activity during 2016/17:*

Strategic business planning was focused predominantly in the OMM2020 and financial planning environments during 2016/17, although specific strategic plans have been developed in areas such as Counter-terrorism.

##### *Intended Activity over the next year:*

2017/18 will see the launch of the Met's Business Plan, which will allow the Met to:

- Support the Commissioner in setting out how the Met will deliver both the PCP and Met priorities and provide strategic direction for business groups and thematic leads.
- Align and integrate budget and resourcing with delivery, as well as provide a tool to measure and report progress and inform decision-making.
- Provide more visibility to officers, staff, our partners and the public around Met activities and our impact on the ground.
- Underpin and consolidate the priorities set out in other strategic documents such as the People Strategy, One Met Model, Inclusion Strategy and others.
- Strengthen Met governance processes, and help prioritise and manage resources in the context of change and limited resources.

The Business Plan - and an agreed quarterly reporting framework - will provide Commissioner and the Deputy Mayor for Policing with assurance on the delivery of strategic outcomes and provide the Met's senior leaders with a tool for managing delivery in business groups and against thematic areas.

## **Change planning**

### *Activity during 2016/17:*

During 2016/17 the OMM 2020 operating model moved from high level design to delivery with the creation of a single portfolio of 12 strategic change programmes. These programmes will deliver the future operating model and associated capabilities set out in the OMM Blueprint and sequenced in the OMM Roadmap and plans. Each programme either aligns to services in the OMM 2020 design or delivers business wide outcomes such as Smarter Working. Importantly technology enablement projects are now fully integrated, mitigating an identified delivery risk. This brings the Met closer to Government best practice guidance in the delivery of major change.

Management Board assumed the role of portfolio Sponsoring Group to steer change programmes against the Met's strategic objectives; to drive the portfolio and programmes, providing investment decisions and support for its rationale, and hold Senior Responsible Owners (SROs) to account for delivery. We appointed new SROs (at DAC or Director level) to lead the programmes; appointed a Strategic Portfolio Transformation Partner (Deloitte) to support delivery and build a permanent transformation capability in the Met; agreed mandates for each programme; introduced a Portfolio Management Group to assure portfolio delivery, risk and dependencies for the Portfolio Investment Board (Executive Board); introduced internal reviews of programmes to assure delivery confidence, and developed high level change impact assessments and benefits profiles for each programme.

In November 2016, the HMIC PEEL review of police efficiency again assessed the Met as 'good', saying: *'Detailed plans are in place to align finances, workforce changes and other resource requirements. The force has an effective governance process to oversee progress. A senior leader is responsible for each programme, and all are accountable to the management board.'*

### *Intended Activity over the next year:*

2017/18 will be a year of substantial delivery across the portfolio. In parallel we will build our permanent transformation capability, aiming to build a world class resource in a new Transformation Directorate, significantly reducing our dependency on consultants and contractors. We will refine our portfolio level milestone tracker and will complete detailed programme plans to show critical portfolio interdependencies. We will develop closer integration between Met Strategic Planning and portfolio planning, and improve the depth of our planning infrastructure, particularly in dependency mapping and with the Counter Terrorism change portfolio.

## **Financial Planning**

### *Activity during 2016/17:*

The Met engaged in a challenging financial planning process aimed at delivering an additional £443m of savings over the period 2016/17 to 2020/21. To deliver these savings we developed a financial strategy with the aim of reducing the size of the back office to c15% of gross revenue expenditure, to drive out efficiency savings across the Met, and to make best use of capital receipts to invest in buildings and IT. The strategy was aligned to the Met's operational blueprint with plans to generate identified savings of £131m over the next four years (on top of £127m required to balance the budget in 2016/17), with a further c£185m of savings to be identified to 2020/21.

In addition a medium term capital plan was developed to support the OMM capability roadmap and OMM 2020 vision. A balanced budget has been set for 2017/18 in line with the statutory requirement and approved by the London Assembly, alongside the three year capital plan.

### *Intended activity over the next year:*

The Met's financial planning process will be further developed in the next year to adapt to the changing Met blueprint and the Met's strategic objectives. The financial envelope will be updated to reflect changes to central government policy or from relevant third parties.

The Met will roll-out a new BCU model in 2017/18. We also anticipate a new funding formula allocation following the current Home Office review. We will continue to lobby for a fair funding settlement for London and a fair allocation of grant to cover National, International and Capital City functions.

### **3. Decision making structures and processes that direct and control activity to achieve strategic outcomes and to deliver on strategic plans.**

#### **Corporate Boards**

##### *Activity during 2016/17:*

A further review of the decision making framework was completed in March 2016. During 2016/17 the Met introduced a single Executive Board. This refined Management Board runs a standardised agenda within a structured annual governance cycle designed to steer organisational health and performance. Three sub-boards support Management Board - Portfolio & Investment, People & Training, and Risk & Assurance with delegation frameworks to escalate to the Executive.

We extended forecasting of agenda planning for Corporate Boards in line with the governance cycle for Management Board, updated Terms of Reference for Corporate Boards and business case templates and guidance, and ran training sessions on the investment appraisal process.

Further changes were made to address recommendations from a DARA review of the Met decision making framework. These included publication of the MPS Scheme of Devolved Financial Management to reinforce delegated authority levels; production of a new business case process based on the Treasury Green Book; monthly summary of corporate decisions to improve accountability; and publication of Project and Programme Guidance and Standards.

##### *Intended activity over the next year:*

We will continue work to create an Annual Business Planning schedule (setting out major milestones in-year for the Board) including strategy, portfolio delivery, people, assets and finance.

#### **Operational decision making**

##### *Activity during 2016/17:*

The Met has, through initiatives such as the OMM 2020 Streamlined Leadership programme and Leading for London project, worked to devolve decision-making, improve communication and strengthen leadership as we restructure services to meet the changing needs of London. The Met is scoping proposals to delayer, subject to the Commissioner reviewing her position on this. A new structure of roles and responsibilities is impacting all ranks from Inspector to DAC.

##### *Intended activity over the next year:*

During 2017/18 we will design new organisational structures and roles over 18 months, and evaluate and define decision-making structures, processes, delegations and pathways at all levels. This will include the relative roles of Chief Officer Groups (COG), 'CrimeFighters' performance meetings, functional (such as neighbourhoods) and thematic (such as mental health) professional leads, and new structures such as a proposed Safeguarding Board.

In addition the Policing and Crime Act 2017 will give chief officers the flexibility to confer a wider range of powers on police staff and volunteers whilst specifying a core set of powers that may only be exercised by warranted police officers.

#### **Borough Command Unit (BCU) Model**

##### *Activity during 2016/17:*

The Met, under the OMM2020 Strengthening Local Policing programme, has redesigned operational structures and processes. This involves a model shifting from our traditional differentiated 32 borough model to a smaller number of larger Basic Command Units (BCU) with specialist support hubs and integrated specialist teams.

The BCU model delivers local policing across borough boundaries in four core areas; Neighbourhoods, Response, Investigation and Protection of Vulnerable People (PVP). Each BCU is headed by a Chief Superintendent, with a Superintendent leading each core area. Specialist functions, such as sexual offences, are integrated into BCUs and PCSOs will engage new powers approved for their use. This model, one of the largest changes to local policing ever made, provides for increased accountability and for devolved decision making.

During 2016/17 we liaised with partners including local councils and MOPAC. In January 2017 we began testing BCUs in two pathfinder areas, bringing together Barking and Dagenham, Redbridge

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and Havering boroughs, and Camden and Islington boroughs. The senior leadership teams were in place in early January, and the functions within each have been phased in.

In February 2017 we enhanced emergency response teams and local investigations. Response officers investigate end-to-end less complex crimes whilst CID focuses on serious, complex, and aggravated crime. In March volume and specialist units were integrated in the investigation of domestic abuse, child abuse and sexual offences. Protecting Vulnerable People (PVP) will also bring together multi agency safeguarding hubs (MASH) and child referral units. This Safeguarding Framework aims to address fragmented governance around Safeguarding and Vulnerability.

### *Intended activity over the next year:*

During 2017 the Met will test and evaluate the BCU pathfinder programme, and subsequent consultation with MOPAC and local authorities will inform roll out across the Metropolitan Police District. To ensure due diligence we have agreed key principles with the Deputy Mayor for Policing and Crime such that: testing needs to be a partnership; the pathfinder sites are intended to build the evidence base to support the proposals; the pathfinder sites will be fully reversible; and governance of the pathfinder sites will be joint with local authorities.

## **4. Monitoring processes by which performance against operational, financial, change and other strategic plans are considered and key issues identified and tasked.**

### **Performance control:**

#### *Activity during 2016/17:*

During 2016/17 we worked with MOPAC on London's Police and Crime Plan, which set performance priorities and our oversight framework for the coming four years. This included a recognition of the changing nature of crime and police demand, and our increased focus on prevention and vulnerability. We developed work around our Vulnerable Localities index, with the aim of combining data from multiple agencies to give a rounded assessment of the safety of every ward in the Capital.

We developed the Met's performance framework, integrating risk, performance and assurance activity in two new teams. Our Data team focused on exploiting multiple sources of information and providing increasingly automated, standardised and intuitive management information across the Met. Our Insight team enhanced our analysis, drawing on knowledge from assurance, risk, performance and academic evidence to inform leaders and improve corporate performance.

During 2016/17 we rationalised our existing IT and introduced Tableau, an industry standard information system that's accessed through the intranet and internet. We developed new products to support Executive level performance scrutiny and key priorities such as a corporate daily dashboard, gang dashboard and a new borough product as Beta (test).

### *Intended activity over the next year:*

For 2017/18 the Mayor will work with the Met and local authorities to define borough level priorities rather than set crime reduction targets for London as a whole. Priorities around volume crime such as antisocial behaviour and burglary will be set locally against borough assessment, crime statistics and local residents' views. High harm crimes such as child sexual exploitation, violence against women & girls and knife & gun crimes will be mandated as a local priority in every borough. Our performance monitoring and analysis will be aligned to this.

We will further develop performance products, including new safeguarding data and increased integration of finance and HR data. We will ensure that available information is more intuitive and easy to use, and embed some live data on the Met's intranet home page linked to further tailored information. This will be part of the wider plans for a digital HQ and smarter working.

### **Financial control:**

#### *Activity during 2016/17:*

We continued to enhance in-year financial reporting to Met and MOPAC Boards, providing greater transparency around performance and management actions. We provided more detailed quarterly reports in the drive towards greater ownership and accountability including budget performance commentaries from Management Board Members as Accountable Officers. In addition monitoring

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reports provided an analysis of emerging financial risks, an update on the delivery of planned savings and the latest workforce projections.

We improved financial governance and accountability by ensuring more rigorous corporate analysis and transparency around budget moves and application of reserves. We published an updated Scheme of Devolved Financial Management, a key financial internal control to ensure that officers and staff with responsibility for committing expenditure are accountable. There is now an increasing reliance on local control of budgets. We also improved alignment of budgets and operational design targets to ensure policing resources are deployed in line with policing priorities.

We established a Gold Group to oversee and control overtime expenditure within the devolved budget framework to ensure delivery of savings built into the base budget 2016/17, and a Gold Group to provide oversight and control over interim staff. We also improved our DARA audit rating on budgetary control to 'adequate' in a follow up audit in February 2017.

### *Intended activity over the next year:*

Corporate Finance will continue to develop the budget monitoring product to Board, in particular key information on progress in delivering planned major change and notably savings agreed within the back office. This will include identification of risks and full impacts of achievement (and non-achievement) of specific savings. A new IT system implementation will enable budget holders to easily access reports and budgetary monitoring tools such as dashboards in a self-service capacity.

## **5. Means to identify and meet the development needs of officers and staff in relation to their roles, aligned to Met priorities and supported by training and learning opportunities.**

### *Activity during 2016/17:*

Responsibility for the Met's training governance was overseen by the Assistant Commissioner Professionalism (ACP). Only training needs which directly supported key priorities were included in the 2016/17 training plan, and the framework for provision of external training was reviewed to improve rigour and scrutiny. Additional governance was introduced to assess externally purchased training through capability requirements and return on investment, prioritised against skill requirements. These processes, and the introduction of a managed service provider to deliver an end to end training service through 500+ providers, improved governance and efficiencies.

During 2016/17 we further improved controls. The development needs of officers and staff were assessed against College of Policing (College) national standards in volume and specialist training provision. The Met participated in the pilot of the College national competency framework, and focused on the quality of training interventions by reviewing syllabus and course content. This increasingly drew on evidence based practice to support operational policing. We completed and evaluated the pilot for 'Leading for London', a development programme with a focus on leading change and embedding skills to create a culture of continuous improvement.

### *Intended Activity over the next year:*

During 2017/18 we will introduce a training environment to support the emerging findings of the Training Transformation Project, developed to review the total learning offer for Met officers and staff and transform our training service. A new training strategy will integrate internal and external training plans, ensuring a broad understanding of learning issues and potential solutions. We will align the 2017/18 training plan to MOPAC's Police and Crime Plan and Met priorities.

We will also support the OMM 2020 BCU implementation, building on work with supervisors, improving response officers' investigation skills, training Dedicated Ward Officers; enabling PCSOs to effectively discharge new legislative powers; supporting protecting vulnerable people (PVP) teams and ensuring that those involved in investigations involving children and young people are professionally competent including the accreditation of PVP practitioners.

The Met, with the College, will test a new Advanced Practitioner role. Constables on four boroughs can be formally recognised as experts in their field and use this to improve performance and develop others, working across the Met, other forces and partner organisations. In addition an on-line app for the Career Development Service (CDS) will be launched by spring 2017. The service, initially to BME and female officers, will include career advice, on-line development, and mentoring.

## **6. Appropriate governance of commercial contracts, partnerships, research relationships and other collaborative working to improve delivery of plans, priorities and outcomes.**

### **Commercial Contracts**

#### *Activity during 2016/17:*

A new Commercial Director was recruited to develop and lead the next commercial strategy focusing on effective contract management, generation of additional revenue and appropriate commercial behaviours across the Met. The Director restated the vision and commercial outcomes and redesigned the Target Operating Model (TOM) to achieve the vision. A new Director of Contract Management was appointed and we further developed the Met's Contract Management team.

In 2016/17 new contractual relationships were finalised for three major areas in line with the '007' Commercial Strategy agreed by MOPAC: Catering and Operational Feeding; Fleet Managed Service (not yet awarded); and Occupational Health. Services provided through major outsourced relationships in previous financial years were consolidated, service delivery was developed and new oversight processes were established. These included Business Support Services – projected to deliver £100m savings; National Uniform Managed Service – saving 16% on purchases; TTPI Tower (Total Technology Programme Infrastructure) contracts - leveraging technology partners to support savings; and Facilities Management Integrator - saving millions of pounds per annum. The Met successfully maintained its previous levels of income and posts funded by third parties.

#### *Intended activity over the next year:*

The TOM will be implemented and we will ensure that the commercial team have the skills, experience and credibility to deliver commercial outcomes. An Intelligent Client Function (ICF) will be established for all major outsourced contracts with a dedicated commercial manager for oversight of each. Formal commercial governance and reporting structures for all contracts will be established and an 'Enterprise Roadmap' will identify opportunities to generate revenue. Detailed business plans will be developed where opportunities are likely to generate medium term income without adversely impacting operational capability. The Met will continue to protect current funding from third parties and will enter into appropriate new contractual agreements, for example with London Airports.

### **Partnerships**

#### *Activity during 2016/17:*

During 2016/17 we focused on significant partnerships through the OMM 2020, including the national procurement hub, enhanced blue light collaborations and new public and commercial collaborations to support the neighbourhood model and vulnerability framework. We supported the London Vulnerability Group to better define multi-agency public service response and governance.

In advance of the Policing and Crime Act 2017 being enacted in summer 2017 we liaised with the London Ambulance Service and the London Fire Brigade to deliver a more joined-up service for London (blue light collaboration). Potential initiatives were identified in five areas: control rooms, prevention, response, support services and inclusion and diversity. There have been over 1,600 joint responses in four pilot boroughs. Our Joint Emergency Service Interoperability Programme (JESIP) includes joint training to improve our ability to deal with major or large-scale response scenarios. We continued to work with the City of London Police and the British Transport police.

We launched the Neighbourhoods strand of the OMM 2020 Strengthening Local Policing model, comprised of Dedicated Ward Officers (DWO), Schools & Youth officers and a Partnership & Prevention hub, in two pathfinder areas in January 2017. This hub is mandated to engage with partners to deliver a multi-agency approach in areas such as licensing, ASB management and business crime reduction. Neighbourhood officers and teams work with partners to identify and solve local issues whilst effectively engaging with communities.

#### *Intended activity over the next year:*

During 2017/18 we will focus on partnerships across all areas of service delivery. There is a broad theme within the OMM 2020 to encourage greater collaborative working, with several pilots in place alongside business cases for potential future investment. We intend to deliver a plan for blue

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light collaboration within 12 months. We will develop and mature a safeguarding framework to deliver a consistent and effective structure for partnership working.

The BCU model, and the component Partnership & Prevention hub, will be evaluated in July 2017 before potential full scale roll out. Training across all ranks and disciplines will form a significant part of activity for the next year. PCSOs and Neighbourhood PCs will receive a 4 module training package which will include inputs on community engagement and working with partner agencies.

### **Research Relationships**

#### *Activity during 2016/17:*

We prioritised engagement with academic and partner capabilities including leading academics and universities, third sector organisations, the College of Policing, the What Works Centre for Crime Reduction and international forces.

We developed projects and embedded governance controls with the Open University Policing Research Consortium, actively participating in Steering Group and Governance Board meetings. The Met/MOPAC and UCL continued to develop the (London) Institute for Global City Policing, recruiting a lead professor and building governance through a Working (Executive) Group and Governance Board. We developed arrangements with academics to support the Met's Professional Leads and thematic Diamond Groups in areas including CSE and organisational learning.

We managed controls and validation of some 250 research projects, from students to national projects, across the Met. We operated the Met's Academic Bursary Scheme to build capability and specialist skills, with a robust process and validation through a panel.

#### *Intended activity over the next year:*

In 2017/18 we will prioritise research and innovation relationships with academics and institutions. We will develop our formal partnerships with the UCL Institute for Global City Policing and with the OU Centre for Research and Learning. Signally we will develop the Met's organisational learning framework with the OU, including systematic collation and analysis of learning and support to thematic professional leads. This will be steered through the Met's Risk and Organisational Learning Meeting.

We intend to develop a Met research plan and an EBP programme, and to provide focus through an EBP intranet homepage with toolkits and resources. We will develop our Met Police Research and Learning Community, in tandem with the College Learning Champions, to drive activity and share research through events and master classes.

### **7. The risk management process by which the Met identifies and seeks to prevent and mitigate key risks.**

#### *Activity during 2016/17:*

The Met maintained level 3 risk management maturity in 2016/17. This represents a position where leaders are discussing structured risk information on a regular basis, processes are in place for all elements of risk management and formal reporting and escalation of risk is well established. The Met's risk management framework and guidance was reviewed and published in November 2016.

*Corporate risk register:* The annual refresh of the register was undertaken in June 2016 which included interviews with all Management Board members. The register continued to be reviewed quarterly by Risk and Assurance Board, chaired by the Deputy Commissioner. Risks were regularly escalated to this meeting by regular reports from sub-boards namely the Risk and Organisational Learning Meeting, Health and Safety Board and the Information Assurance and Security Board and through a new "risk radar" product designed to ensure swift escalation of emerging risks from business groups. Portfolio risks are reviewed quarterly by Portfolio and Investment Board.

#### *Intended improvement activity over the next year:*

An action plan is in place to drive risk management to level 4 maturity, focused on: development of an integrated risk and assurance framework; actions to drive culture change including leadership behaviours to foster a risk challenge culture; improvements to the wider Met governance

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framework, particularly strategic business planning; improvements to risk management processes including a risk appetite statement and further risk control mapping; improvements to the organisational learning framework based on the outcomes from an Open University scoping study.

### **Business Continuity:**

*Activity during 2016/17:*

The Met has driven regular risk assessment of pre-planned works and collaboration between stakeholders to ensure that disruption is not caused or that the impact of disruption is minimised in the operational environment. Real time implementation of plans to protect critical activity has been successfully executed in several cases over the past few years. We have focused on assuring business continuity planning and plans, and on enhancing our capabilities.

*Intended activity over the next year:*

We will improve the level of testing of Operational Command Unit (OCU) and Business Unit business continuity plans. We will improve our capabilities with external professional and academic tuition and through internal business engagement.

### **Insurance:**

*Activity during 2016/17:*

The Insurance Strategy was reviewed and revised in 2016 under the supervision of the Met's qualified in-house insurance professional. A key component of the insurance programme, the property insurance cover, was subject to competitive tender in 2016 resulting in a change of insurer to achieve the best premium price, insurance value and strategic fit for the programme.

*Intended activity over the next year:*

We will implement changes to the Insurance Strategy, including the creation of a cross-functional group led by the Insurance Manager to identify and model possible significant insurable risks.

## **8. Effective financial stewardship and financial controls including financial instructions, a scheme of delegation and supporting instruments which define means to manage risks, support service delivery and achieve value for money.**

*Activity during 2016/17:*

During 2016/17 we worked to strengthen our three lines of defence model. Progress against recommendations was reported to Management Board and Audit Panel. We provided regular audit and assurance reporting to Commercial and Finance SMT and worked with DARA to monitor management response to all agreed DARA recommendations in this area.

To underpin the Oracle IT system implementation the Met continued significant data cleansing to improve data quality to support financial reporting and forecasting. We also reviewed financial data security measures. We implemented improvements to the Commercial and Finance risk register to support the Chief Finance Officer in her statutory assurance role, and reviewed the increasing number of collaborative and hosting arrangements to ensure accountability.

The Met operated a forum to prevent salary and pension under/overpayments due to changes in staff rotas and working arrangements, and automated validation checks in respect of financial reporting. We completed a successful tax audit with HMRC. We made further improvements to our faster closedown timetable. The Met also worked with other forces in consultation with external auditors to implement the changes in the new CIPFA Accounting Code of Practice.

*Intended activity over the next year:*

We will ensure an effective financial control environment in the Oracle IT system implementation (with our shared service provider SSCL) and undertake process re-engineering to enhance the corporate finance function and finance business partnering. We will work with DARA on the adequacy of our internal controls during the transition to a more commercial framework and map internal controls in light of new system implementation. We will work with DARA and business groups to strengthen our three lines of defence in respect of financial control, and will improve intranet guidance and best practice.

## **9. Audit and assurance processes by which the Met ensures accountability and assures Management Board, MOPAC and the public that controls are working adequately.**

### **Audit and Assurance:**

#### *Activity during 2016/17:*

The Met's three lines of defence framework provides assurance around: first - business operations risk control and performance management; second - organisation oversight functions; and third - independent and internal audit assurance. Work has been ongoing throughout 2016/17 to strengthen audit, inspection and review services. A tracker of audit and inspection reports and recommendations has been implemented enabling better oversight of audit and inspection and progress against areas of improvement, recommendations and risks.

#### *Intended improvement activity over the next year:*

Throughout 2017/18 we will continue to mature the Met's assurance framework by integrating it with our risk management framework and wider governance approach, better articulating roles and responsibilities and ensuring that these are understood particularly at the first line of defence.

### **Financial assurance:**

#### *Activity during 2016/17:*

Throughout 2016/17 we matured the three lines of defence framework, integrating it with our risk management framework and wider governance approach, and better articulating roles and responsibilities. A high level mapping exercise enabled a better understanding of second and third line assurance. Three year maps of audit and inspection focus provided to all business group heads enabled future audit and inspection plans to be focused on areas of greatest risk.

The adoption of a more commercial approach to the provision of Finance, HR, Procurement and other outsourced support services involved new ways of seeking assurance over the Met's internal control framework. This year DARA and Met/MOPAC practitioners worked with the Cabinet Office and SSCL as part of the transition process to understand the ISAE 3402 environment and how the new internal audit approach will work in practice.

#### *Intended activity over the next year:*

Work will continue to strengthen audit, inspection and review services including the assurance role performed within Commercial and Finance as a second line of defence. During 2017/18 we will work with DARA to develop the internal audit approach and in particular their responsibility to the CFO in pursuance of S151 statutory duties. Links will be made between other forms of external assurance such as HMRC, HMIC, external auditors and new forms of commercial assurance such as ISAE 3402 overseen by Government Auditors BDO to ensure full coverage.

## **10. Processes for investigating complaints from the public, for identifying potential fraud or misconduct and for reporting against audit, inspection and other recommendations.**

### **Complaints and misconduct**

#### *Activity during 2016/17:*

The Met, with MOPAC, continued to drive improvements in processes, skills and performance in response to major legislative and regulatory change. From January 2016 police misconduct hearings were chaired by a legally qualified chair, rather than a senior police officer, and all police gross misconduct discipline hearings were held in public unless the chair determined otherwise. Further reviews took place on the handling of public complaints, including recording and the role of the Police and Crime Commissioners in this process.

The Directorate of Professional Standards was re-shaped with more officers deployed to misconduct investigations, principally to reduce investigation timescales and support the Prevention and Reduction Team (PaRT) to get upstream of problems, share organisational learning and reduce complaints. This has cut complaint allegations by about 30%, alleviating the number of officers on restrictions or suspensions and giving swifter closure to complainants.

#### *Intended activity over the next year:*

The Policing and Crime Act 2017 has introduced further reforms to police disciplinary and complaints systems. This includes strengthening PCCs' oversight of the local complaints system

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and making PCCs the appellate body for appeals currently heard by chief constables. The Act also enables PCCs to take on other functions within the complaints system, with the option of responsibility for the local front-end and for all duties regarding contact with the complainant.

The Met will, with Government, the Mayor and others, evidence the extent to which changes to the police misconduct system increase police accountability and make the process fairer. DPS will continue to develop pro-active preventative processes to identify organisational risks and trends and direct interventions and will improve the Met's capability to identify and reduce misconduct through the enhanced PaRT, aligned to OCU's and BCUs to support local professional standards units (PSU). DPS will also introduce a discrimination unit to investigate grievance and discriminatory behaviour before this develops into misconduct or criminality.

### **Fraud and misconduct**

*Activity during 2016/17:*

Met representatives continued to attend the joint MPS/MOPAC Fraud Forum to raise fraud awareness, prevent fraud across the MOPAC Group and support the Met's major transformation programme. The Met updated the Anti-Fraud, Corruption and Bribery Strategy, enhancing the narrative around bribery and launched a mandatory e-learning course (NCALT) on Anti-Bribery and Fraud Awareness in conjunction with DARA.

*Intended activity over the next year:*

As part of the Met's Commercial Strategy we will continue to roll-out the Bribery e-learning course across the Met. We will develop and place increased reliance on automated assurance tools.

### **Audit and Inspection reporting:**

*Activity during 2016/17:*

Regular reports were submitted to Risk and Assurance Board and to MOPAC/Met Joint Audit Panel throughout 2016/17. These provide assurance that audit and inspection recommendations are being addressed and highlight exceptions. There is a particular focus on any audit that attracts a "limited" assurance rating from our internal auditor DARA or a "requires improvement" rating from HMIC. Senior leads are in place for all audits and inspections and are accountable for ensuring that recommendations are addressed within agreed timescales.

*Intended activity over the next year*

During 2017/18 we will continue to focus on reporting against and addressing high risk areas.

## **11. Establishing clear channels of communication and engaging with all sections of the community and stakeholders on priorities, plans and policing activity.**

### **Community Engagement and Confidence**

*Activity during 2016/2017:*

Over the last year Neighbourhood Boroughs progressed their 2016/17 confidence plans, with low confidence boroughs inspected and supported by Commander Engagement. A Summer Engagement Programme took place in priority areas.

The Met engaged with primary and secondary schools, faith premises and hospitals in London, recognising that these hubs allow us to connect with many diverse sections of the community. The Met's schools engagement programme inputted to year 6 pupils on 'Choices and Consequences'. We focused on developing the Volunteer Police Cadet programme. Cadets have the most diverse profile in the Met with over 30% considered at risk of crime without positive intervention.

The Met initiated neighbourhood schemes such as 'coffee with cops' and visits to local BME groups. We delivered briefings for women and girls at risk of Child Sexual Exploitation, Female Genital Mutilation and Hate Based Violence, ran surgeries in religious premises such as Mosques and summits with specific groups such as the Somali community. We ran leadership programmes with Bangladeshi community groups and capability building with Muslim community groups.

Critical incident management was developed and plans were implemented for activity following a terrorist atrocity post Brussels, Paris, Orlando and elsewhere. Work has been conducted with Faith groups and community groups to share the police response to a CT incident.

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### *Intended activity over the next year:*

The BCU model will require the re-evaluation and consolidation of confidence plans to meet changed demographics. 2017/18 engagement plans will explain local policing changes and ensure that local priorities are addressed. OMM 2020 programmes will introduce more interactive digital access to Policing services, and enhanced social media engagement across the Met will aim to embed and humanise policing following a pilot at Kingston Borough in 2016/17.

PCSOs and neighbourhood PCs will be trained on the use of social media and on 'Local Life', a new public facing webpage for neighbourhood teams to engage with the local community. They will also receive training on community engagement and working with partner agencies, neighbourhood watches and residents associations. A second Dedicated Ward Officer, as a minimum, will be introduced to each of London's 629 wards by the end of 2017.

### **Public Access and Engagement**

#### *Activity during 2016/2017:*

The Met's Public Access Programme explored ways to make more of our services publicly accessible through digital channels, including self-serve for basic transactions. This included a trial of Digital 101 using social media and a self-service option for reporting vehicle collisions. BCU pathfinders began to manage a greater proportion of crime online or by phone from January 2017.

The Met's trialed, in BETA, a new website including self-help facilities such as on-line crime reporting, webchat and crime tracking. Met CC trialed a pilot social media contact service and the Met extended its use of social media to support operational policing, with over 500,000 followers for our core feed @metpoliceuk, the biggest of any UK emergency service. We issued up to 35 monthly public video appeals seeking information on suspects, with a success rate of c50%.

The Met launched a crime prevention movement 'Be Safe' to develop a new model for engaging with partners and the public. We provided media training for local police officers as part of a shift to a 'self-service' model of media support, allowing a smaller Directorate of Media and Communication (DMC) to focus on critical incidents of national interest or high risk such as the table-top exercise conducted with the media to plan for dealing with a marauding firearms attack.

#### *Intended activity over the next year:*

The Met's new website launched fully in March 2017, with content including news, community engagement, corporate information, prevention and integrated social media content reflecting local community priorities. The website includes Local Life pages as a platform for community engagement with targeted crime prevention advice based on local crime data. A further programme to provide enhanced services is already planned including uploading digital evidence, an application and a live chat facility for the public contacting Met CC. DMC will introduce a customer insight function to support the roll-out of digital services for the public.

## **12. Processes for publicising performance, financial and other information and for meeting Freedom of Information and public requests whilst assuring information security.**

### **Publicising Information**

#### *Activity during 2016/17:*

The Met accelerated the publication of information through the Publication Scheme that may otherwise be subject to a right of access request under the Freedom of Information Act. The Scheme promoted access to documents from the 'your right to information' link on the Met website including policing priorities, primary decision making and key policies.

#### *Intended activity over the next year:*

The Met's Publication Scheme will be refreshed through the new Met internet site to provide a contemporary user experience. This will also support freedom of information request applicants with prompts to published information where available. Further phases of the internet programme will be developed through the year with an extension to data protection subject access requests.

## **Media and Communications**

### *Activity during 2016/17:*

The Directorate of Media and Communications actively supported major incidents, operations and issues throughout the year and operated a network of more than 500 social media feeds which socialise information directly from officers to the public, and a main Met Police Twitter feed with over 500,000 followers.

### *Intended activity over the next year:*

A key focus will be developing the Met's new internet service to the public with an emphasis on services and local information.

## **FOIA and public requests**

### *Activity during 2016/17:*

The Met's Information Rights Unit worked to enhance information access performance throughout the year. Significant improvement in data protection subject access performance resulted in the Met's removal from formal monitoring by the Information Commissioner's Office (ICO). Our performance on freedom of information requests remained below target however, and the Met remains subject to an improvement action plan and monitoring action.

The Met elected for a Consensual ICO Audit of our Data Protection Good Practice Audit, with three phases: Data Protection Subject Access – reasonable assurance; Data Protection Governance – limited assurance; Security - pending. Our Information Assurance and Information Rights teams engaged in extensive negotiations for major Met outsourcing contracts throughout the year, ensuring protection of Met information assets in new contracted services.

Work continued to implement and embed the Records Management Toolkit (Operation Filesafe) and to review local records management practices following the Ellison Report. This was extended to accommodate significant change in building usage under the OMM 2020 Corporate Real Estate and Smarter Working Programmes, and will continue to March 2018.

### *Intended activity over the next year:*

We will drive the Met's performance in responding to freedom of information requests and maintain liaison with the ICO in their monitoring of the Met. We will also maintain improved performance on data protection subject access requests. We will ensure that the current case management system for information access requests is as effective and reliable as possible and explore opportunities for early and suitable replacement.

We will continue with the Records Management Toolkit implementation to conclusion in March 2018 and engage with the Met Integrated Policing Systems Programme to ensure appropriate records management design. We will embed the Information Management Governance Framework in support of the Met's Information Management Strategy through the establishment of Information Asset Owners and develop an Information Asset Register.

## **13. Ensuring familiarity and compliance with relevant law and regulations, internal policies and procedures, and ensuring that activity and expenditure is lawful.**

### **Law and regulations**

#### *Activity during 2016/17:*

In 2016 the Met was subject to two major enquiries, the Undercover Policing Inquiry and the Independent Inquiry into Child Sexual Abuse (IICSA), to a Section 20 Statutory Investigation by the Equality and Human Rights Committee (EHRC) and other high profile cases. The Met implemented ACAS recommendations following a Met grievance procedures review. The Directorate of Legal Services (DLS) worked with other forces and agencies on major litigation such as the Leigh Day pension challenge. DLS established regular meetings with MOPAC, and completed tendering for the National Legal Service Framework (NLSF) providing legal services at competitive rates.

#### *Intended activity over the next year:*

During 2017/18 DLS will support the new Commissioner to implement the MOPAC Police and Crime Plan and continue to strengthen engagement with MOPAC. The Undercover Policing and IICSA Inquiries will continue and DLS will provide legal support Metwide. DLS will establish

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improved relationships and working practices with the judiciary and local authorities when dealing with the safeguarding of children in providing family disclosure information.

### **Policy**

#### *Activity during 2016/17:*

During 2016/17 we continued to provide a more streamlined and efficient policy development process. Bespoke action plans for policy developers provided clear guidance on consultation, equality impact assessment and clear timelines for corporate quality assurance and approval. We continued to convert lengthy procedures into easy to use policy toolkits. Policy owners remain responsible for ensuring that their respective policies are monitored and remain fit for purpose.

#### *Intended activity over the next year:*

We will incorporate post-implementation reviews into the Commissioner's Policy Forum, initially for high risk policies reviewed in 2015/16, and provide oversight on medium and low risk policies in briefings. We will enhance support to policy developers on equality impact assessments. We will continue tracking OMM 2020 programmes to identify gaps and commission policy, and to support the implementation of policy and procedural change through the policy development process.

### **Financial activity and lawful expenditure:**

#### *Activity during 2016/17:*

We published an updated Met Scheme of Devolved Financial Management that clearly specifies budget holders' roles and responsibilities. In particular, the scheme provides clarity on key issues such as flexibility for budget holders to manage the overall budget (rather than line by line) and the rules governing budget movements and use of reserves. We undertook scanning of relevant sources to identify potential fraud activities, continued application of the National Fraud Initiative and continued professional development to ensure compliance.

#### *Intended activity over the next year:*

During 2017/18 we will conduct an annual review of the Met Scheme of Devolved Financial Management and Financial Instructions.

### **Environmental:**

#### *Activity during 2016/17:*

Following a review of our Environmental Management System (EMS) we continued to improve alignment to ISO 14001, and updated environmental compliance auditing and incident reporting procedures. The Met contributed to Mayoral environmental priorities and supported the Air Quality Plan, electric vehicle and low carbon initiatives. We began upgrading our fleet to cleaner fuels, and maintained our new buildings and estate refurbishments to a BREAAAM score of 'very good'.

#### *Intended activity over the next year:*

Property Services Department (PSD), responsible for EMS implementation, will continue to work across the Met and with suppliers to meet our environmental and sustainability responsibilities.

## **14. Developing, communicating and embedding codes of conduct and defining the standards of behaviour for officers and staff.**

### **Standards of Behaviour and Ethics**

#### *Activity during 2016/17:*

In-year the DPS PaRT delivered training on the code of ethics and broader professional standards issues across the Met - in recruit training, in promotion courses, at local OCU training days and for bespoke issues such as improving the use of local resolutions. This included expected standards of behaviour when using social media, in an official or personal capacity, as monitored by DPS.

We continued to embed Met values, standards and behaviours into policies and processes to shape activity and practice. We introduced values-based screening of applicants and values-based assessments for all promotion processes. We embedded values into corporate induction processes from July and introduced a new values-based performance and development process. We established the London Police Challenge Forum with British Transport Police (BTP) and City of London Police (CoLP) to support officers and staff facing ethical policing challenges. The Forum convenes quarterly to debate challenging ethical issues and to provide advice and guidance.

## Not Protectively Marked

### *Intended activity over the next year:*

Over the next year PaRT will develop a strategy building on the training programme to ensure that best practice in the code of ethics is shared and developed across all professional standards teams. This will include bespoke training in areas where complaints highlight greater risks.

### **Culture and Behavioural change**

#### *Activity during 2016/17:*

We introduced coaching within the Leading for London programme to help participants identify personal development priorities, create individualised learning programmes, and integrate and synthesise feedback from sources such as 360 degree feedback and psychometric testing in order to employ new capabilities acquired through formal and informal learning experiences. “Challenging coaching” was employed because it moves beyond the limitations of traditional coaching to challenge Met leaders to implement new skills and make sustainable change.

We continued to foster cultural and behavioural change through the OMM2020 Workforce Futures programme. This included the Met, with the College of Policing, promoting direct entry at Inspecting and Superintending ranks, modelling career pathways and testing a new Advanced Practitioner role that enables Police constables to be formally recognised as experts in their field and use their expertise to further develop policing skills, raise standards, and develop others.

#### *Intended activity over the next year:*

The Total Professionalism programme will oversee activity within each work strand, aligning activities to ensure consistency with the overall vision, monitoring progress towards the agreed outcomes and encouraging innovation and good practice at a local level. We will roll-out Leading for London to embed a culture of continuous self-sustained business improvement, and enhance initiatives such as reflective learning, direct entry and Police Now.

## **E. Governance issues and actions for 2017/18**

The Met faces substantial challenges throughout 2017/18 and in the immediate environment to 2020. We will continue to focus on crime and public safety, costs and confidence in policing against a backdrop of significant change and evolving demands. Our plans will be informed by six major trends impacting London:

1. Changing crime - traditional alongside new and changing threats such as cybercrime, demand on the Met is likely to grow faster and further.
2. Constrained public finances - Further potential reductions in policing or in partner agencies will reshape services.
3. Population growth - London will remain one of the world's most ethnically diverse cities and will grow further, accentuating differences between London and the rest of the UK.
4. Economic growth - growth will shape social and economic change in London at a pace that will be different to the rest of the country.
5. Political change - Brexit and international change. New powers for local authorities and greater collaboration. Working with MOPAC to deliver a new Police and Crime Plan.
6. Advancing Technology - communication is going pure digital, pure mobile.

We remain committed to implementing a governance framework that supports delivery of our strategic objectives including setting out clear accountabilities and robust processes, and will continue to build on improvements made during 2016/17. As a result of our 2016/17 annual review, we have identified eight areas to be addressed over the next twelve months to further improve the Met's governance and internal control environment. These areas are:

1. Strategic vision and planning  
Lead: Director of Strategy & Governance
2. Decision making processes and delegation  
Lead: Director of Strategy & Governance
3. Performance management  
Lead: Director of Information and Insight
4. Capability, Training and Development  
Lead: AC Professionalism
5. Commercial, collaborative and strategic partnerships  
Lead: Director of Finance & Commercial /Director of Strategy & Governance
6. Assurance Framework  
Lead: Director of Strategy & Governance
7. Community engagement and public confidence  
Lead: AC Territorial Policing
8. Information management  
Lead: AC Professionalism

In consideration of the upcoming DARA audit opinion (due June 2017) and the Grant Thornton LLP audit actions (due July 2017) these improvement areas remain subject to the development of detailed plans prior to publication of the audited AGS 2016/17 and Statement of Accounts in July 2017, with a schedule of periodic review and reporting through 2017/18.

**F Declaration**

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

Signed

Signed

**Craig Mackey**

**Lynda McMullan**

**Deputy Commissioner of Police of the Metropolis**

**Chief Financial Officer**

**Date June 2017**

**Date June 2017**

Protective Marking	None
Suitable for Publication Scheme	Yes - when signed
Title and Version	CPM Annual Governance Statement 2016/17 (unaudited)
Purpose	As part of the Met's Corporate Governance Framework, an Annual Governance Statement is completed, signed by the Commissioner and Deputy Commissioner and published with the Met Statement of Accounts
Relevant to	Met Management Board and MOPAC
Creating branch	Strategy and Governance, MetHQ
Authors	Paul Clarke and Jo Collins, MetHQ
Date created	April 2017
Date to be audited	June 2017
Date to be signed	July 2017 (following audit)

**G Glossary of terms**

<b>ACRONYM</b>	<b>DEFINITION</b>
AC	Assistance Commissioner
ACPO	Association of Chief Police Officers
AGS	Annual Governance Statement
BOCU	Borough Occupational Command Unit
CAIU	Civil Actions Investigation Unit
CCoA	CIPFA Common Chart of Accounts
CFO	Chief Financial Officer
CIPFA	Chartered Institute of Public Finance and Accountancy
CPM	Commissioner of Police of the Metropolis
CST	Complaint Support Team
DAC	Deputy Assistant Commissioner
DARA	Directorate of Audit Risk & Assurance
DLS	Directorate of Legal Services
DP	Digital Policing
DPA	Data Protection Act
DPS	Directorate of Professional Standards
EBP	Evidence Based Policing
EIA	Equality Impact Assessment
EMS	Environmental Management System
FBP	Finance Business Partners
FoIA	Freedom of Information Act
HMIC	Her Majesty's Inspectorate of Constabularies
ICF	Integrated Client Function
ICT	Information and Communication Technologies
IFAC	International Federation of Accountants
IPCC	Independent Police Complaints Commission
IASB	Information Assurance and Security Board
MET	Metropolitan Police Service
METSEC	MPS Security
MMR	Monthly Monitoring Reporting
MOPAC	Mayor's Office for Policing and Crime
MPS	Metropolitan Police Service
NPCC	National Police Chiefs' Council
OCU	Operational Command Unit
OMM 2020	One Met Model 2020
PaRT	DPS Prevention and Reduction Team
PDD	Professional Development Day
PSSC	Professional Standards Strategic Committee
RSA	Royal Society for the encouragement of Arts, Manufactures and Commerce
SIAM	System Integration Application Management
SMP	Sustainability Management Programme
SMS	Safety Management System
SOLACE	Society of Local Authority Chief Executives
SOP	Standard Operating Procedures
TNO	Total Notifiable Offences
TPP	Total Professionalism Programme
VfM	Value for Money

## **Local Code of Governance**

### **Metropolitan Police London**

2016/17

This Code of Governance (Code) sets out the governance structure, processes and procedures in place to enable the Metropolitan Police Service (Met) to carry out its functions effectively. It is framed within the CIPFA/SOLACE Framework 2016 with due regard to the Met's operating environment. The overall aim is to ensure that resources are directed in accordance with agreed policy and priorities, that there is sound and inclusive decision making and that there is clear accountability for the use of resources to achieve desired outcomes for our communities.

Additionally the Met conducts an annual review of the effectiveness of its system of internal control and publishes a statutory Annual Governance Statement (AGS) with the Met's Statement of Accounts. The AGS reports publicly on compliance with this Code and aims to provide assurance that the Met is monitoring and managing governance arrangements set out in the Code effectively. The AGS further outlines how the Met will make improvements to its governance in the forthcoming year.

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## **A. Scope of responsibilities**

The Commissioner of Police of the Metropolis (CPM) is responsible for maintaining the Queen's peace and has direction and control over the officers and staff operating within the Metropolitan Police Service (Met). The CPM holds office under the Crown and is appointed by the Queen on the recommendation of the Home Secretary, having regard to any recommendations by the Mayor's Office for Policing and Crime (MOPAC).

The CPM is accountable in law for the exercise of policing powers and to MOPAC for the delivery of efficient and effective policing, management of resources and expenditure by the Met. At all times the CPM, her constables and her staff remain operationally independent in the service of the public. In discharging her overall responsibilities the CPM is responsible for establishing and maintaining appropriate risk management processes and governance arrangements, and for ensuring that there is a sound system of internal control which facilitates the effective exercise of these functions. This is captured in the Met's Local Code of Governance.

The CPM as an independent legal entity or corporation sole, with direction and control of the force and responsibility for delivering operational policing, is legally required to produce an Annual Governance Statement. The Statement helps MOPAC to hold the CPM to account for efficient and effective policing. The AGS sits alongside the statutory accounts for the Met and gives assurance in respect of the Met's governance arrangements and compliance with the Code. MOPAC produces its own Governance Statement.

Under s.35 of the Police Reform and Social Responsibility Act 2011 in exercising their functions the CPM must ensure that good value for money is obtained. Further s.38 of the Policing and Crime Act 2017 enables chief officers to make the most efficient and effective use of their workforce by giving them the flexibility to confer a wider range of powers on police staff and volunteers (while for the first time specifying a core list of powers that may only be exercised by warranted police officers).

The CPM is required to appoint a professionally qualified Chief Financial Officer (CFO) for the Met. Under the Police Reform and Social Responsibility Act 2011 the CFO has a personal fiduciary duty by virtue of their appointment as the person responsible for the proper financial administration of the Met. This includes requirements and formal powers to safeguard lawfulness and propriety in expenditure (Section 114 of the Local Government Act 1988 as amended by paragraph 188 of Schedule 16 to the Police Reform and Social Responsibility Act 2011 ("2011 Act")).

The statutory responsibilities of the CFO are held by the Director of Commercial and Finance who is a member of the Management Board. Throughout the year the CFO was involved in, and able to bring influence to bear on, all material business decisions in line with the CIPFA "Statement on the role of the Chief Financial Officer (CFO)". The CFO leads the promotion and delivery by the CPM of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently and effectively. This requires that the finance function is resourced to be fit for purpose and appropriate management accounting systems, functions and internal controls are in place such that finances are kept under review on a regular basis.

## **B. Operating Environment**

The Police Reform and Social Responsibility Act 2011 established a Police and Crime Commissioner for each police force area across England and Wales. In London the elected Mayor takes the office of Police and Crime Commissioner, through the Mayor's Office for Policing and Crime (MOPAC), and is responsible for the totality of policing in the capital outside of the City of London. Day to day responsibility is delegated to the Deputy Mayor for Policing and Crime (DMPC).

The Metropolitan Police (Met) is responsible for maintaining the peace and is accountable in law for the exercise of policing powers, and to MOPAC for the delivery of efficient and effective policing, management of resources and expenditure. At all times the Commissioner and her officers remain operationally independent in the service of the public.

MOPAC sets the strategic direction of Policing for the Met through the Police and Crime Plan (PCP), taking into account Capital City and national policing functions set out in the Home Office Strategic Policing Requirement. MOPAC hold the Met accountable for delivery against the PCP, whilst the GLA Police and Crime Committee hold the Mayor to account for his responsibilities. MOPAC and the Met have joint governance structures to enable scrutiny and accountability.

The Met develops strategic objectives and a business plan to deliver on policing priorities, and the structure, culture and means to deliver these. In this we work to:

- Embed a governance control framework to ensure that the Met effectively delivers on strategic objectives in the Police and Crime Plan 2017-21.
- Successfully implement our major change programme and deliver significant savings whilst improving service delivery in policing London.

## **C. The Governance Framework**

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

In adopting this framework the Met fully accepts that:

**Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.**

Achieving good governance in the Met requires effective arrangements for:

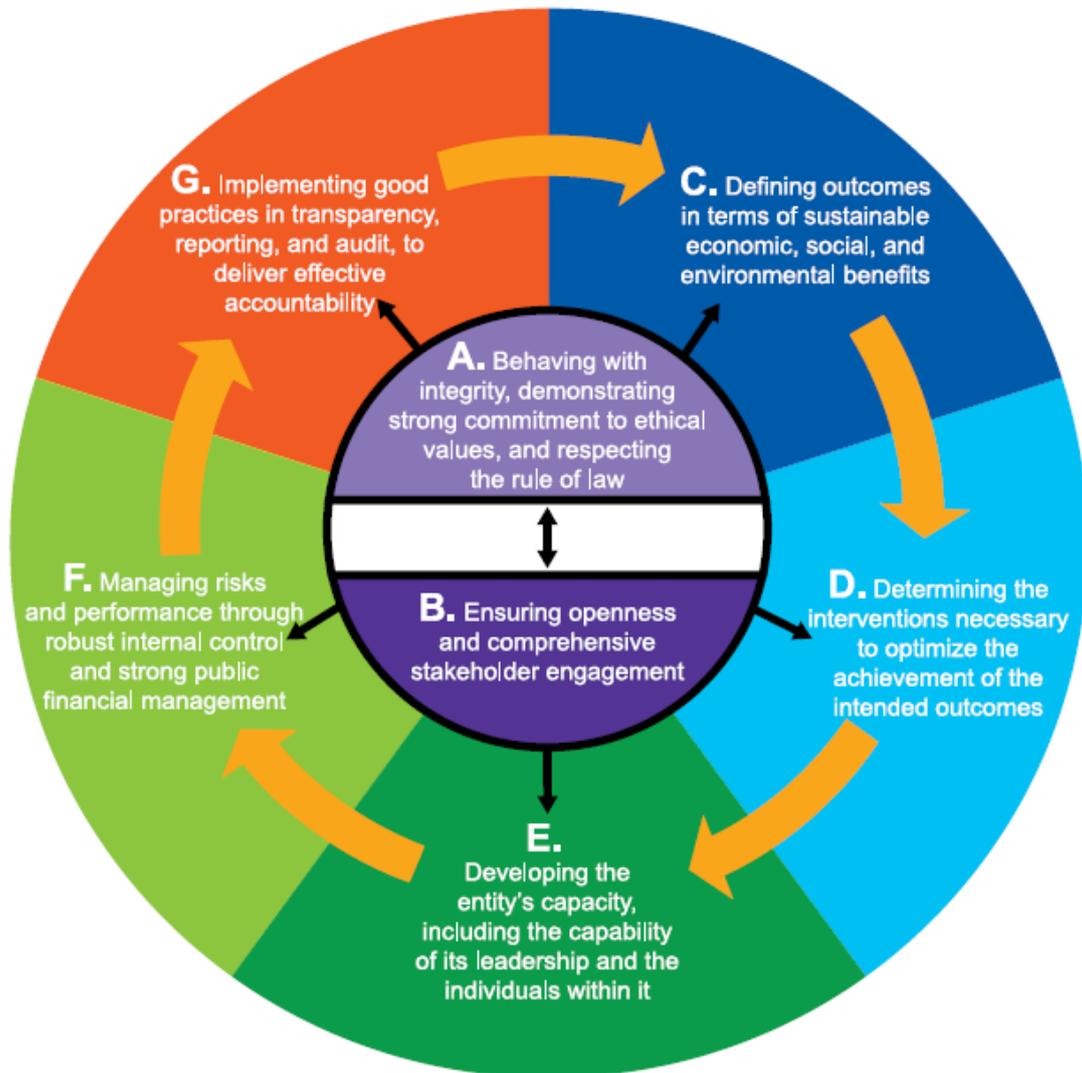
- Defining outcomes in terms of sustainable economic, social and environmental benefits.
- Determining the interventions necessary to optimise the achievement of intended outcomes.
- Developing the Met's capacity, including the capability of its leadership and the individuals within it.
- Managing risks and performance through robust internal control and strong public financial management.
- Implementing good practices in transparency, reporting, and audit to deliver effective accountability.

**The fundamental function of good governance in the public sector is to ensure that entities achieve their intended outcomes while acting in the public interest at all times.**

Acting in the public interest requires:

- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law.
- Ensuring openness and comprehensive stakeholder engagement.

## Achieving the Intended Outcomes While Acting in the Public Interest at all Times



CIPFA/IFAC 2014

### Met governance model

The Met governance model focuses on recognised frameworks, processes and internal controls that enable the Met to meet strategic objectives and manage challenges. These include:

- Strategic objectives and outcomes
- Strategic planning framework
- Decision making structures and processes
- Financial governance
- Risk Management
- Performance framework
- Assurance framework
- Change governance
- Capability and Skills
- Standards of behaviour
- Stakeholder engagement
- Legal and regulatory compliance

Not Protectively Marked

In developing this Code and the subsequent Annual Governance Statement fourteen key areas of governance have been identified for the Met. The detailed controls below represent those in place at 31 March 2017 and accord with proper practice.

<b>Defining outcomes in terms of sustainable economic, social and environmental benefits</b>	
1	Processes for setting the objectives and targets that support the MOPAC Police and Crime Plan 2017-21 policing priorities, and for defining strategic issues facing the Met.
2	A strategic planning framework for establishing and scheduling operational priorities, finance and resource allocations, transformational change and our roadmap to delivery.
<b>Determining the interventions necessary to achieve the intended outcomes</b>	
3	Decision-making structures and processes that direct and control activity to achieve strategic outcomes and to deliver on strategic plans.
4	Monitoring processes by which performance against operational, financial, change and other strategic plans are considered and key issues identified and tasked.
<b>Developing the Met's capacity, including the capability of its leadership and of individuals in it</b>	
5	Means to identify and meet the development needs of officers and staff in relation to their roles, aligned to Met priorities and supported by training and learning opportunities.
6	Appropriate governance of commercial contracts, partnerships, research relationships and other collaborative working to improve delivery of plans, priorities and outcomes.
<b>Managing risks and performance through robust internal control and strong public financial management</b>	
7	The risk management processes by which the Met identifies and seeks to prevent and mitigate key risks.
8	Effective financial stewardship and financial controls including financial instructions, a scheme of delegation and supporting instruments which define means to manage risks, support service delivery and achieve value for money.
<b>Implementing good practices in transparency, reporting, and audit to deliver effective accountability</b>	
9	Audit and assurance processes by which the Met ensures accountability and assures Management Board, MOPAC and the public that controls are working adequately.
10	Processes for investigating complaints from the public, for identifying potential fraud or misconduct and for reporting against audit, inspection and other recommendations.
<b>Ensuring openness and comprehensive stakeholder engagement</b>	
11	Establishing clear channels of communication and engaging with all sections of the community and stakeholders on priorities, plans and policing activity.
12	Processes for publicising performance, financial and other information and for meeting Freedom of Information and public requests whilst assuring information security.
<b>Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law</b>	
13	Ensuring familiarity and compliance with relevant laws and regulations, internal policies and procedures, and ensuring that activity and expenditure is lawful.
14	Developing, communicating and embedding ethical standards, codes of conduct and defining the standards of behaviour for officers and staff.

## **D. Met governance**

### **1. Processes for setting objectives and targets that support MOPAC's Police and Crime Plan policing priorities, and for defining strategic issues facing the Met.**

#### *Key controls to manage this activity:*

The MOPAC Police and Crime Plan sets the strategic direction for the Met and other criminal justice agencies in London and outlines the Mayor's policing requirements over a four year period. In response the Met reviews priorities and develops an annual Business Plan. Both take account of the Strategic Policing Requirement in areas of national threat such as terrorism.

With each new administration at City Hall the Met works collaboratively with MOPAC to support a new Police & Crime Plan, and drafts a complementary Met Business Plan to set out how priorities will be implemented. This is informed by our understanding of the future operating environment for policing London, including the GLA's London Landscape analysis, with a particular focus on evaluating demand and the impact of our service on our stakeholders.

[https://www.london.gov.uk/sites/default/files/mopac\\_police\\_and\\_crime\\_plan\\_2017-2021.pdf](https://www.london.gov.uk/sites/default/files/mopac_police_and_crime_plan_2017-2021.pdf)

### **2. A strategic planning framework for establishing and scheduling operational priorities, finance and resource allocations, transformational change and our roadmap to delivery.**

#### *Key controls to manage this activity:*

Strategic planning enables a corporate view of planned activity across the Met to assure Management Board and MOPAC that there are adequate plans in place to deliver the Met's objectives and the One Met Model 2020 (OMM 2020 transformation programme); to support decision making and risk identification; and to enable the Board to hold leads to account.

#### **Met Business Plan**

The Met Business Plan, reintroduced for 2017/18, sets out the Met's contribution to the delivery of the strategic priorities of the MOPAC Police and Crime Plan and plans for operational policing, with specific objectives and milestones for each year. The Business Plan is reviewed annually in conjunction with the budget cycle and in light of policing contribution to the strategic outcomes set by the Mayor. The Business Plan - and an agreed quarterly reporting framework - provides the Commissioner and Deputy Mayor for Policing with assurance on delivery of strategic outcomes and provides senior leaders in the Met with a tool for managing delivery in business groups and against thematic areas within available resources.

#### **Change planning**

The One Met Model 2020 sets out how we will transform the way we work over the next five years. The Met must modernise the force and keep our resources focused on priority areas whilst delivering an effective service and a "universal offer" to all Londoners. The OMM 2020 describes how this programme of change will happen and the systems, processes and capabilities required to deliver this.

The Met operates a single OMM change portfolio with 12 strategic change programmes that are designed to deliver the future operating model and capabilities set out in an OMM Blueprint and sequenced in an OMM Roadmap and Level 1 plans. Each programme within the portfolio either aligns to a service within the OMM2020 design or delivers business wide outcomes such as Smarter Working. We continue to strengthen controls and governance with an emphasis on service delivery and benefits realisation - these and other changes to governance bring the Met closer to Government best practice guidance. Management Board regularly reviews the portfolio.

#### **Financial Planning**

Financial planning arrangements include an established annual planning cycle within a long-term financial strategy, the development of robust and deliverable budgets, provision of professional financial advice in-year to support decision making and provision of regular financial management information and prompt final accounts. Management Board approves the Met's annual budget for submission to the Deputy Mayor for Policing and Crime. The Met adopts a culture of devolved local accountability whilst promoting effective internal control.

## Not Protectively Marked

The Met's Investment Board makes recommendations to the MOPAC/Met Joint Investment Board on spending options of over £0.5M, approves business cases in line with the Scheme of Financial Delegation, and ensures that financial decisions are informed and that risks, impacts and costs/benefits are considered.

### **3. Decision making structures and processes that direct and control activity to achieve strategic outcomes and to deliver on strategic plans.**

*Key controls to manage this activity:*

#### **Corporate Boards**

Joint MOPAC/Met governance processes and internal Met decision making and reporting arrangements are designed to deliver robust Met decision making and MOPAC scrutiny.

Joint Boards include: *Oversight Board* which exercises MOPAC's responsibility for oversight of the Met and initiates, approves and oversees delivery of the budget and key strategies; *Investment Advisory Board* ensures that Met investment decisions relating to goods, services, property acquisitions and disposals are sound; *Joint Audit Panel*, an independent panel, advises MOPAC and the Commissioner on good governance principles, including assurance on the adequacy and effectiveness of frameworks in place to discharge certain legal duties. The Panel receives reports from the Met on significant risks and on audits and inspections, and provides independent advice as to the integrity of the financial statements.

In March 2016, following a review, the Met introduced new Executive decision making structures with a single Executive Board. This new *Management Board* has a standardised agenda as part of a structured annual governance cycle designed to review the health and performance of the business as well as take key decisions on issues. Three sub-boards *Portfolio & Investment*, *People & Training* and *Risk & Assurance* have delegated powers to take decisions or escalate issues to the Executive to ensure decisions are taken at the most appropriate level.

#### **Programme and Project Governance**

The Met's Portfolio Transformation Office manage the delivery of all change projects across the organisation. The team is comprised of skilled change and project management professionals working with our strategic partner Deloitte to design and deliver a better Met.

Our governance process around major projects is based on acknowledged public sector best practice and seeks to ensure appropriate governance is exercised over significant investment projects. The process has two key features: the 'Five Case model' for business cases, which ensures the benefits of the project are addressed in a consistent manner; and a 'Gate' process which ensures oversight during the progress of the project.

The Met's OMM 2020 portfolio governance structure fits within the Met's decision making framework. Management Board is the Sponsoring Group for the portfolio through a quarterly deep dive review programme. Projects and programmes in the portfolio report to their respective project and programme boards and through to the Portfolio & Investment Board (PIB). All meet monthly. To support PIB, the Portfolio Management Group (PMG) monitors portfolio delivery such as spend against budget, progress against plans, delivery of benefits, and management of dependencies.

#### **Operational decision making**

Every constable is an independent legal entity, the public's guarantee of impartiality. Officers of the crown operate independent of undue influence, interference and with personal responsibility. The Office of Constable means a police officer has additional legal powers of arrest and control of the public given to them directly by a sworn oath and warrant. Each sworn constable is an independent legal official and each police officer has personal liability for their actions or inaction. The chief officer of the force to which the constable is attached has a level of corporate responsibility, as do Board members and nominated roles such as Chief Financial Officer and Chief Legal Officer.

In addition the Policing and Crime Act 2017 gives chief officers the flexibility to confer a range of powers on police staff and volunteers whilst for the first time specifying a core list of powers that may only be exercised by warranted police officers.

## Not Protectively Marked

Operational decision making to direct and report against activity defined in strategic plans is undertaken through Chief Officer Groups (COGs) and their equivalent senior leadership team (SLT) structure, with senior supervisory rank officers and staff heading each OCU and BCU. Thematic leadership in areas such as Mental Health and Missing Persons is provided by cross Business Group professional leads supported by long-term problem solving Diamond Groups.

#### **4. Monitoring processes by which performance against operational, financial, change and other strategic plans are considered and key issues identified and tasked.**

*Key controls to manage this activity:*

##### **Performance control**

The Met works with MOPAC to define London's Police and Crime Plan, which sets performance priorities and our oversight framework for the coming four years. This includes recognition of the changing nature of crime and police demand, and our increased focus on prevention and vulnerability, on the least safe places and people.

The Met has an established performance framework which connects performance discussions at Management Board through Business Groups to individual Command Units. This has been developed to give line of sight from individuals' objectives to the Met's Strategy and Business Plan. Key controls include MOPAC oversight, Management Board interventions, Business Group 'Crimefighters' performance meetings and SLT's, and Diamond Group thematic analysis. Surveys in public confidence, victim satisfaction and perceptions of crime provide an independent control.

The Met's performance framework is increasingly integrating risk, performance and assurance activity. Our Data team focuses on exploiting multiple sources of information and providing an increasingly automated and intuitive set of management information for colleagues across the Met. Meanwhile our Insight team enhances our analysis, drawing on knowledge from assurance, risk, performance and academic evidence. As we further mature our governance cycle this insight will increasingly influence our strategy, planning and decision making.

##### **OMM 2020**

The OMM 2020 portfolio employs a four tier reporting framework. Using a standard monthly structure the projects report to project boards and then by exception to respective programme boards, while the programmes report to Portfolio Investment Board. This ensures that issues are reported once and managed at the appropriate level. On a quarterly basis the portfolio reports to Management Board as part of its deep dive review programme.

A Portfolio Management Group (PMG) looks in greater detail at cross programme issues and dependencies. This will be complemented by a Design Authority to ensure an integrated approach to design across the portfolio and with enabling functions such as Digital Policing, Human Resources and Property Services. Internal reviews assure confidence in the delivery of individual programmes. We intend to extend this assurance regime to include independent external reviews.

##### **Financial control**

MOPAC's Police and Crime Plan sets the strategic direction for the Met. In turn the Met's financial governance framework encompasses a long-term financial strategy, the development of robust and deliverable budgets, provision of professional financial advice in-year to support decision making and provision of regular financial management information and prompt final accounts. This is supported by financial governance structures, financial systems, policies, internal controls and assurances across the Met to deliver value for money and achieve a balanced year end budget.

The Met adopts devolved local accountability whilst promoting effective internal control. Management Board members are responsible for agreeing their budgets and maintaining expenditure within this envelope to ensure effective financial control. Members and budget holders are responsible for accurate recording of income and expenditure - in ensuring tight budgetary control they rely on local forecasting and variance analysis within monthly monitoring reporting (MMR). Corporate Finance oversees the whole budgetary planning process and provides a Monthly Management Report (MMR) to Management Board and to MOPAC.

**5. Means to identify and meet the development needs of officers and staff in relation to their roles, aligned to Met priorities and supported by training and learning opportunities.**

*Key controls to manage this activity*

The evolving Met People Strategy 2017/20 identifies a significant challenge in thinking radically about how we equip our staff with the right capabilities, skills and knowledge to perform effectively. People development is governed through the executive level People and Training Board, and structures and processes in Strategic HR, the Directorate of Professional Standards (DPS) and the OMM 2020 programme.

The Assistant Commissioner Professionalism (ACP) holds responsibility for the Met's training governance. Development needs of officers and staff are assessed against national standards laid down by the College of Policing in volume and specialist training provision. In commissioning the Met's annual training plan ACP assesses proposed training needs against identified key priorities in a rigorous challenge process. Additional governance is in place to assess externally purchased training through capability requirements and return on investment, prioritised against skill requirements. Each business area is held accountable for the relevance and validity of requested external courses.

The OMM2020 Workforce Futures programme aims to foster cultural and behavioural change, promoting training and learning initiatives such as direct entry, detective career pathways, advanced practitioner and career activism to develop policing skills and raise standards. Programme and project governance is maintained across all strands.

**6. Appropriate governance of commercial contracts, partnerships, research relationships and other collaborative working to improve delivery of plans, priorities and outcomes.**

*Key controls to manage this activity:*

**Commercial Contracts**

The governance of commercial contracts, commercial partnerships and collaborative commercial relationships is vested in the Commercial Directorate which applies Governance through a Target Operating Model (TOM) and organisational structure that ensures that contracts and partnerships are managed by qualified teams supported by a Commercial Assurance Team.

A Third Party Contracts Team manages contractual agreements and receipt of income from all third parties who fund additional policing services. Agreements are managed in accordance with MOPAC's Scheme of Delegation and Consent and the receipt of income is managed in accordance with NPCC charging guidance and MPS financial instructions. Each area of legislation governing receipt of income and the Met's ability to enter into an agreement is overseen by a dedicated team member.

The Contract Management Team comprises a team of Contract Managers and Supplier Relationship Managers who are embedded within the business and who provide dedicated commercial management of the largest contracts and oversight of smaller contractual relationships. Formal governance processes are being established for the major contracts with monthly and quarterly operational meetings and six monthly Chief Officer review.

Category Teams are responsible for the end to end procurement of major goods and services from market engagement to contract award in accordance with MOPAC's Scheme of Delegation and Consent, the Public Contract Regulations, and all associated legislation and regulations. This work includes collaborative procurement with the GLA family, other police forces and 'blue-light' services.

**Partnerships**

The MOPAC Police and Crime Plan emphasises the importance of working with statutory and voluntary partners in providing support and reducing harm in London. The Policing and Crime Act 2017 places a new duty on police, fire and rescue and emergency ambulance services to collaborate where it is in the interests of their efficiency or effectiveness, and enables Police and Crime Commissioners to take on responsibility for the governance of fire and rescue services.

## Not Protectively Marked

Partnership governance is managed according to funding arrangements. The Met's Third Party Contracts Team manage partnerships that involve an exchange of funding, while other partnerships are managed locally with the Met's established Partnership Policy and Toolkit. Financial partnerships are recorded and reported to Board in the budget monitoring process.

The corporate Partnership Policy and Toolkit defines controls for all partnerships that meet agreed criteria in relation to longevity, value, resourcing and risk. The Partnership Management Process (PMP) Policy provides a three stage framework for delivering robust decision-making in entering and closing partnerships as well as effective governance and management. This ensures that the Met makes informed decisions about entering partnerships, and improves operational delivery.

The PMP is mandatory for all new Met partnership arrangements but the full process is only required under criteria including a lifespan of six months or more; a resource of one full-time person or more for six months; it is statutory; or it is expected to involve any corporate high risk factor in the corporate risk register. This ensures that all new Met partnerships are supported by a business case defining benefits, risks, investment, consultation and business impact. Best practice examples are available and a best practice network of 25 partnership leads is in place.

### **Research Relationships**

Research and Evidence Based Policing (EBP) will enable the Met to be more effective by evidencing and socialising what works best and exploring new ways of working. We have set out five key areas to develop controls: governance, the research landscape, internal capability, external relationships, and sharing.

Our research projects and relationships are governed through a control function in MetHQ Strategy and Governance, with individual research projects governed through professional and operational leads as Senior Responsible Officer (SRO). We provide robust governance through an EBP Committee, chaired by the AC Professionalism, that defines research priorities and generates activity, and an EBP Steering Group that manages delivery and champions EBP.

All research and research relationships are registered and validated with the corporate team, including a Research Protocol and Information Sharing Agreements (ISA), and logged in the Met Police Research and Learning Register. Signal academic relationships, such as with UCL and the OU, are governed through respective Board and Steering Group structures in the faculty.

### **7. The risk management process by which the Met identifies and seeks to prevent and mitigate key risks.**

#### *Key controls to manage this activity:*

The Met risk management framework is in place to support effective decision making and provide assurance that risk is managed effectively at all levels. The framework operates at three levels - corporate, business group and basic command unit.

An established corporate risk register is refreshed annually following interviews with Management Board members. The risk register is reviewed quarterly by Risk and Assurance Board, chaired by the Deputy Commissioner. Risks are regularly escalated to this meeting from sub-boards namely a quarterly Risk and Organisational Learning Meeting, Health and Safety Board and an Information Assurance and Security Board chaired at AC or senior Director level. Other risks are escalated through a "risk radar" product designed to ensure swift escalation of emerging risks from business group level. Portfolio risks are reviewed and discussed at Portfolio and Investment Board.

Diamond Groups with standard terms of reference, chaired by Commanders, ensure more comprehensive management of significant thematic risk areas and each business group has a risk register which is reviewed quarterly by Chief Officer Groups. Other key controls include a risk management statement that sets out the vision for risk management including the expectations of our leaders, awareness and skills and the risk management framework and approach. This statement is reviewed and approved annually by Management Board. Annual business group maturity assessments are carried out against the Met's risk management maturity model, resulting in implementation plans to drive maturity to the next level.

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The Met is assessed as operating at level 3 risk management maturity. This represents a position where leaders are discussing structured risk information on a regular basis, processes are in place for all elements of risk management and formal reporting and escalation of risk is well established.

### **Business Continuity:**

The Met has plans in place to ensure business continuity following disruptive incidents. Regular risk assessment of pre-planned works and collaboration between stakeholders takes place to ensure that disruption is not caused or that the impact of disruption is minimised in the operational environment. Real time implementation of plans to protect critical activity has been successfully executed in several cases over the past few years.

### **Insurance:**

The Met continues to maintain, develop and renew its insurance programme in order to ensure appropriate cover of risks in accordance with our Insurance Strategy. An annual Stewardship report is completed for MOPAC on renewal outcome and strategy. The Met employs a qualified in-house insurance professional to manage insurance, who in liaison with the appointed insurance broker ensures that all insurance policies are suitable. The insurance manager works with the Met procurement team to ensure that all contracts are procured in line with legislation.

### **Health and Safety:**

The MPS Safety Management System (SMS) is enshrined in the MOPAC/MPS Corporate Health and Safety Policy. All Operational Command Unit, department and business group leads provide assurance regarding their SMS to the Commissioner annually, identifying improvement areas. An annual health and safety letter of assurance is provided by the Commissioner to the Deputy Mayor. The Safety and Health Risk Management Team audit operational thematic and safety management performance whilst the Property Services Compliance Team audit property and fire safety. Met safety governance is coordinated via a Health and Safety Board and reported to Management Board and to MOPAC/MPS Joint Audit Panel.

## **8. Effective financial stewardship and financial controls including financial instructions, a scheme of delegation and supporting instruments which define means to manage risks, support service delivery and achieve value for money.**

### *Key controls to manage this activity:*

Effective stewardship is maintained by ensuring that managers and staff under each Board Member's command are compliant with the relevant regulations, policies and procedural guidance; achieve value for money; and ensure that effective checks and balances exist. MOPAC is responsible for reviewing and updating MOPAC Group Financial Regulations as well as the Good Conduct and Anti-Fraud Policy with the Met and Scheme of Consent and Delegation between MOPAC and the Met.

The Met's Director of Commercial and Finance is responsible for maintaining Financial Instructions. These represent the application and interpretation of Financial Regulations applicable to the Met and are reviewed regularly to ensure that they remain fit for purpose. They are a key element in the financial governance framework developed to define accountabilities, identify how decisions are taken and ensure legal and procedural compliance. Policies and procedural guidance is updated regularly, and accounting policies are reviewed annually with major changes approved by MOPAC.

The Regulations, Instructions and guidance are key to ensuring that the financial affairs of the Met are properly administered having regard to probity, legality and appropriate standards. Our internal auditors the Directorate of Audit, Risk and Assurance (DARA) and our external auditors maintain a keen interest.

## **9. Audit and assurance processes by which the Met ensures accountability and assures Management Board, MOPAC and the public that controls are working adequately.**

### **Assurance control:**

### *Key controls to manage this activity:*

The Met operates the recognised three lines of defence framework which provides assurance at: first line - business operations risk control and performance management; second line -

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organisation oversight functions including serious crime and financial review; and third line - independent and internal audit assurance.

At the third level the Met is subject to planned and unplanned audit and inspection from a number of agencies, the most significant of which are Her Majesty's Inspectorate of Constabulary (HMIC), the Independent Police Complaints Commission (IPCC), internal audit through the Directorate of Audit, Risk and Assurance (DARA), and our external auditor Grant Thornton LLP.

An internal audit plan is agreed annually by Management Board and approved by the independent MOPAC/Met Audit Panel. Progress against the plan is reported to Risk and Assurance Board and to MOPAC/Met Audit Panel quarterly.

### **10. Processes for investigating complaints from the public, for identifying potential fraud or misconduct and for reporting against audit, inspection and other recommendations.**

*Key controls to manage this activity:*

#### **Complaints and misconduct**

Processes for addressing complaints against the police are governed by Acts of Parliament, Home Office guidance and Independent Police Complaints Commission (IPCC) statutory guidance. Regulations introduced in the Police Reform and Social Responsibility Act 2011 and new regulations in the Policing and Crime Act 2017 have prompted revisions to statutory guidance.

Met direction is set by the Professional Standards Strategic Committee (PSSC) which steers response to issues and drives Professional Standards policy. The Met's DPS Complaints Support Team assesses all recorded public complaints and allocates potential misconduct investigations where an officer is alleged to have breached standards of professional behaviour. DPS oversee four reporting routes, accessible to the public and the police, for suspected misconduct or criminal behaviour including reporting online or through the anonymous 'Right Line' 'phone service.

Police misconduct is governed by Police Conduct Regulations and Police Staff Council Joint Circular 54 for misconduct proceedings. The main Met guidance for dealing with complaints is the Met's Misconduct Investigation guide, supported by a Guide to the Local Management of Misconduct Proceedings for Operational Command Units. Gross misconduct hearings are held in public, chaired by an independent lawyer. Misconduct meetings are held in private, chaired by a senior police officer, although information on misconduct procedures must be published.

The Policing and Crime Act 2017 has reformed disciplinary and complaints systems by giving the Police and Crime Commissioner (PCC) explicit responsibility for ensuring the effective and efficient delivery of the local police complaints system, and making PCCs the appellate body for appeals (previously heard by Chief Constables). The Act also gives PCCs the option of responsibility for the front-end of the complaints system and for all duties regarding contact with the complainant.

#### **Fraud and misconduct**

All Met officers and staff have a commitment to uphold the highest ethical standards of behaviour. These standards are set out in the College of Policing code of ethics and the GLA code of conduct. The Deputy Mayor for Policing and Crime and the Commissioner are responsible for maintenance of an anti-fraud, anti-corruption and anti-bribery strategy which applies to all staff under their operational control. The MOPAC/Met anti-fraud strategy forms part of our corporate governance arrangements and provides a framework to co-ordinate activity. Deliverable outcomes are reviewed by a Fraud Forum and reported to MOPAC/Met Joint Audit Panel.

Financial Instructions set out expected standards of behaviour and action when suspected fraud is discovered. Prevention techniques include clear and concise policies and procedures, training in fraud awareness and effective fraud risk management. Controls also include well publicised arrangements to facilitate confidential reporting such as 'Right-Line'. DARA operate a dedicated fraud team with the expertise to undertake fraud investigations where necessary. The Met is also part of the National Fraud Initiative which matches data between key organisations in the public and private sector to identify potential irregularities for investigation for fraud or other errors.

**Audit and Inspection reporting:**

Regular reports are submitted to Risk and Assurance Board and to MOPAC/Met Joint Audit Panel. These provide assurance that audit and inspection recommendations are being addressed and serve to highlight exceptions. There is a particular focus on any audit that attracts a “limited” assurance rating from our internal auditor DARA or a “requires improvement” rating from HMIC. Senior leads are in place for all audits and inspections and are accountable for ensuring that areas for improvement are addressed within agreed timescales.

**11. Establishing clear channels of communication and engaging with all sections of the community and stakeholders on priorities, plans and policing activity.**

*Key controls to manage this activity:*

**Community Engagement and Confidence**

The College of Policing model of engagement requires the Met to actively seek views and opinions on policing, involve stakeholders and communities in problem solving, and to have formal feedback processes. The model exists to ensure clear channels of communication. The Met works with MOPAC to discharge its statutory duty of public consultation across London, and to engage with all of London’s communities.

The Met has developed and academically validated a robust Confidence Model to understand and respond to factors impacting public confidence in policing. There are four strands: engagement; combating anti-social behaviour; fair treatment; and effectiveness in dealing with crime. A Met Confidence Board oversees the Met’s strategic confidence plan and directs activity against MOPAC’s public confidence parameters. Each Borough Commander leads a confidence plan which is responsive to local issues, steered through local Crimefighters performance forums.

MOPAC’s Police and Crime Plan defines priorities including community engagement to identify, and problem-solve local priorities and communicate activity. The Met’s Community Engagement Strategy underpins activity across the organisation. Met engagement is informed by analysis of an established London Public Attitude Survey, and through public Borough Boards and Ward Panels. The Ward Panel, a representative group that informs policing priorities, is often supplemented by virtual Panels to allow a wider range of representation and involvement.

As a global city many residents and visitors identify with broader communities as well as with a geographical neighbourhood. The Met’s community profiles scope these networks to inform service delivery and communication channels. Other areas of business, such as the Trident Gangs Command, have established community reference groups or independent advisory groups. The Met monitors global events and employs processes to respond to incidents including engagement and communication plans for the aftermath of a terrorist incident in London, and a plan and messaging process to alleviate fear, tension and hate crime following overseas incidents.

**Public Access and Engagement**

The Met’s Directorate of Media & Communications (DMC) works to a strategy approved in 2016, which supports the Met’s Business Plan 2017/18 in delivering against priorities identified in the MOPAC Police & Crime Plan. Progress reports are regularly reviewed by Management Board.

The Met’s OMM 2020 Improving Public Access and First Contact Programme Board provides governance around projects to develop digital and social channels for delivering service to the public from contact to court. The Met’s Public Access Strategy has been developed and validated through qualitative public research and engagement with internal stakeholders. The strategy includes plans to accelerate digital access to policing services, the development of digital 101 channels, and a social engagement strategy focused on London’s communities. A key enabler is a new internet platform for 2017. Director DMC is SRO for the development of the Met’s website, with the Project Board reporting to the Public Access Board.

## **12. Processes for publicising performance, financial and other information and for meeting Freedom of Information and public requests whilst assuring information security.**

*Key controls to manage this activity:*

### **Publicising Information**

The Met's Publication Scheme publishes information of public interest that may otherwise be subject to a right of access request under the Freedom of Information Act. The Scheme promotes access to documents from the '[your right to information](#)' link on the Met website. There are a number of information classes:

- *Who we are and what we do:* includes the Met's organisational structure and key personnel.
- *What our priorities are and how we are doing:* service-level documents on strategic aims, objectives and plans, and performance information.
- *How we make decisions:* the ratified minutes of open strategic decision making meetings.
- *Our policies & procedures:* these establish expected organisational behaviour in line with our objectives. Some exempt material in this class should not, in the public interest, be published.
- *List and registers:* includes gifts and hospitality registers, business interests, Met contracts and media contacts.
- *What we spend and how we spend it:* includes Chief Officers' travel and hospitality expenses.
- *The services we offer:* includes the Met general fees and charges and the Met rates for special services for police.
- *Other information:* includes other material that is likely to be of significant public interest.

### **Media and Communications**

The Directorate of Media and Communications (DMC) media policy mandates openness as a guiding principle. DMC operates a 24 hour staff media bureau to manage significant news, and sets corporate policy for our 500 plus social media feeds. DMC supports operations and investigations through press releases, social media campaigns, press conferences and media interviews. This includes incidents that attract significant media interest, news programmes and social media channels. DMC offer guidance on marketing campaigns that target hard to reach audiences and help the Met to engage effectively through crime prevention materials.

The Met's internal communications channels include features, news, forums and blogs on the Met's intranet, operational and people notices, the Job magazine, Commissioner's forums, Commissioner's all-staff briefings and our Excellence in Total Policing awards. Leaders are involved in regular leadership communications events and activities.

### **FOIA and public requests**

The Met's Information Management Strategy sets out objectives for information management. The Information Assurance and Security Board (IASB), chaired by the Met's Senior Information Risk Owner (SIRO), is responsible for information management including Data Protection and Freedom of Information compliance. It meets six weekly and receives regular performance reports on information management and security. The IASB through the SIRO is responsible for information risk management, and the SIRO is supported in this by Information Asset Owners in each key business area. The SIRO reports to the Risk and Assurance Board chaired by the Deputy Commissioner. During 2016/17 AC Professionalism held the role of SIRO.

## **13. Ensuring familiarity and compliance with relevant law and regulations, internal policies and procedures, and ensuring that activity and expenditure is lawful.**

*Key controls to manage this activity:*

### **Law and regulations**

Processes for ensuring compliance with relevant law and regulations are well established. All reports to Management Board, Executive Boards and MOPAC must consider legal implications. The Director of Legal Services (DLS) advises Management Board, and a DLS representative

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advises other strategic boards. DLS hold weekly risk management meetings and advise Gold Groups established to develop solutions to significant risks and issues.

The MetLaw reception desk monitors requests for external legal advice, with emergency out of hours legal advice available. The Met routes all requests for legal advice via an access to legal services process thereby providing a quick self-help facility, better control and join up of services.

DLS ensure that there are no significant liabilities arising from legal non-compliance included in the financial statements. All actual or potential litigation or claims are correctly recognised in the Statement of Accounts as provisions or contingent liabilities where they meet Accounting Standards criteria. DLS reviews individual claims and assesses settlement and cost. The MOPAC Scheme of Consent and Delegation gives authority to the DLS to approve the settlement of claims, with all significant claims requiring MOPAC approval.

### **Policy**

The Met's policy framework informs progress of all policy development work. The quarterly Commissioner's Policy Forum reviews and approves high risk policies in accordance with the corporate policy review plan. Medium or low risk policies are approved by Chief Officer Groups at business group level. All policies are subject to equality impact assessment carried out with guidance from the Corporate Policy Unit to ensure that the Met meets its public sector duty under the Equality Act 2010. Met policy is accessible via our intranet site PolicyPages.

### **Financial activity and lawful expenditure:**

Processes for ensuring compliance with relevant law and regulations are well established. The MOPAC Scheme of Consent and Delegation gives the Met authority to spend. The Met's Director of Commercial and Finance is responsible for maintaining Financial Instructions, a key element in the financial governance framework developed to define accountabilities, identify how decisions are taken and ensure legal and procedural compliance. Reports to Met Management Boards and to MOPAC must consider financial implications.

### **Environmental:**

The Met is committed to environmental sustainability through responsible management of the organisation's environmental impacts. This is implemented through an environmental management system (EMS) in response to policy and legislative review including Mayoral strategies and targets. An annual Sustainability Management Programme (SMP) provides the framework for implementation, and progress is monitored through the Environment and Sustainability Governance Board to ensure that we are meeting our environmental commitments and delivering continuous improvement. Performance is reported annually through the Met's Environment and Sustainability Report.

## **14. Developing, communicating and embedding codes of conduct and defining the standards of behaviour for officers and staff.**

*Key controls to manage this activity:*

### **Standards of Behaviour and Ethics**

Standards of behaviour and ethics are governed through national and force protocols. The Police Code of Ethics provides for standards across policing in England and Wales. It has legal status, with operating principles to assist decision making and action: accountability, fairness, honesty, integrity, leadership, objectivity, openness, and respect and selflessness. The Met's Values – integrity, professionalism, courage and compassion – and Professional Standards policy align with those in the Code of Ethics, supported by a practical guide including standards expected against each value and examples of positive and negative behaviours.

The Met's Directorate of Professional Standards is responsible for ensuring that all officers and staff adhere to professional standards and codes of conduct, for adopting a transparent approach to professional standards to ensure public confidence in the Met's response to their complaints and to effectively deal with poor behaviour by officers and staff. Improvement of ethical standards is delivered through the DPS Prevention and Reduction Team (PaRT) whose officers are aligned to OCU's in order to deliver consistent training and support to local professional standards teams.

**Culture and Behavioural change**

The Total Professionalism Programme (TPP) is the Met’s cultural and behavioural change programme, led by AC Professionalism and governed through a Total Professionalism Board. The programme aims to ensure that Met culture is aligned with organisational objectives and priorities, with Met values and behaviours and the national Code of Ethics for policing. The programme works to embed the Met’s Values, fostering professional accountability and personal responsibility to champion positive behavioural change.

The Met’s Leading for London (LfL) programme, governed through an LfL Authority Board, identifies the leadership and cultural needs of the Met and develops training to transform culture, build leadership capability and support broader change. It is intended as a lever to drive positive behaviours, embedding people management skills defined in our leadership framework and creating opportunities to develop better working practices, to empower staff to communicate and engage more effectively with Met and public audiences.

The OMM2020 Workforce Futures programme, governed through a Programme Board, also aims to foster cultural and behavioural change. This addresses issues such as direct entry, detective career pathways, advanced practitioner and career activism to further develop policing skills and raise standards. Programme and project governance is maintained across all strands.

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**E Glossary of terms**

<b>ACRONYM</b>	<b>DEFINITION</b>
AC	Assistance Commissioner
ACPO	Association of Chief Police Officers
AGS	Annual Governance Statement
BCU	Basic Command Unit
(B)OCU	(Borough) Occupational Command Unit
CAIU	Civil Actions Investigation Unit
CCoA	CIPFA Common Chart of Accounts
CFO	Chief Financial Officer
CIPFA	Chartered Institute of Public Finance and Accountancy
CPM	Commissioner of Police of the Metropolis
CST	Complaint Support Team
DAC	Deputy Assistant Commissioner
DARA	Directorate of Audit Risk & Assurance
DLS	Directorate of Legal Services
DP	Digital Policing
DPA	Data Protection Act
DPS	Directorate of Professional Standards
EBP	Evidence Based Policing
EIA	Equality Impact Assessment
EMS	Environmental Management System
FBP	Finance Business Partners
FoIA	Freedom of Information Act
HMIC	Her Majesty's Inspectorate of Constabularies
ICF	Integrated Client Function
ICT	Information and Communication Technologies
IFAC	International Federation of Accountants
IPCC	Independent Police Complaints Commission
IASB	Information Assurance and Security Board
MET	Metropolitan Police Service
METSEC	MPS Security
MMR	Monthly Monitoring Reporting
MOPAC	Mayor's Office for Policing and Crime
MPS	Metropolitan Police Service
NPCC	National Police Chiefs' Council
OCU	Operational Command Unit
OMM 2020	One Met Model 2020
PaRT	DPS Prevention and Reduction Team
PDD	Professional Development Day
PSSC	Professional Standards Strategic Committee
RSA	Royal Society for the encouragement of Arts, Manufactures and Commerce
SMP	Sustainability Management Programme
SMS	Safety Management System
SOLACE	Society of Local Authority Chief Executives
SOP	Standard Operating Procedures
TNO	Total Notifiable Offences
TPP	Total Professionalism Programme
VfM	Value for Money