

**M O P A C**MAYOR OF LONDON  
OFFICE FOR POLICING AND CRIME

## MPS-MOPAC JOINT AUDIT PANEL

### 18 January 2021

### Met Audit & Inspection Report

Report by: Director of Strategy & Governance

Non-restricted paper

#### Report Summary

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

This report provides Audit Panel with a summary position of DARA and HMICFRS activity and engagement over the last quarter.

Since last quarter's report, the Met has received 4 new DARA actions that meet this monitoring threshold. During the same period, 31 actions were implemented and are now proposed as closed. Of these, 21 are from original audits and 10 from follow-ups.

HMICFRS inspection activity has increased with two additional thematic inspections scheduled before the end of the financial year in addition to the planned national child protection inspection.

##### Key Considerations for the Panel

The Panel should consider the breadth of audit activity taking place by DARA. The concerted efforts by colleagues to address their outstanding audit actions in all business groups is having a positive impact; Digital Policing particularly demonstrates this with 12 recommendations being delivered this quarter, leaving them with no outstanding actions. The MPS Risk and Assurance Board welcomed this progress at its meeting in early December.

##### Interdependencies/Cross Cutting Issues

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

##### Recommendation

The Audit Panel is recommended to note the progress being made to track and monitor audit actions centrally that meets the agreed threshold.

## 1. Supporting Information

### Risk and Assurance Board update

- 1.1. Risk and Assurance Board met on 1 December 2020 where they acknowledged progress made on audits across the business and supported ongoing efforts on this, including early and meaningful engagement with recommendations when they are made.

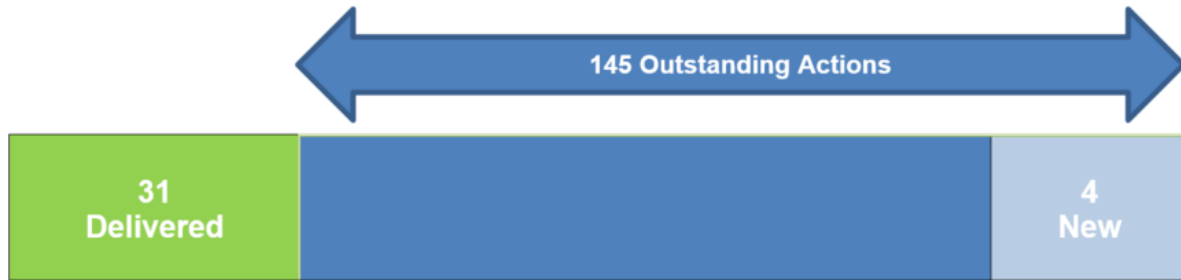
### Internal Audit update

- 1.2. Strategy and Governance monitor Met progress on all high-risk actions from DARA's audits, as well as the medium-risk actions of any audit receiving a "limited" grading. Responsibility for monitoring implementation of all other lower risk actions sits with leaders locally.
- 1.3. Since last quarter's report, the Met has received 4 new actions that meet this monitoring threshold. During the same period, 31 actions were implemented and are now proposed as closed. Of these, 21 are from original audits and 10 from follow-ups. These will be shared with DARA to assist with formally closing these actions in the follow up audits and so any challenges can be raised. Of the 31 actions closed within the last quarter, 28 were due between March and September 2020.
- 1.4. The total number of outstanding actions is now 145 compared to 172 last quarter.
- 1.5. Digital Policing have shown a determined effort to address risks identified in the Smarter Working Asset Management Limited audit and have delivered 12 recommendations, leaving them with no further actions.
- 1.6. 10 of the 31 actions recommended for closure were from Corporate Services, with 9 from Limited Follow-up audits, demonstrating commitment to address areas that have been identified as high risk.

#### Actions delivered this quarter

Audit Title	Audit received	Actions closed
Inclusion and Diversity Strategy	2017/18	1
Business Continuity and Return to Normality Arrangements	2018/19	2
Wellbeing Strategy Development and Implementation	2019/20 Q3	1
ICT Access Control Framework	2019/20 Q3	4
Smarter Working Asset Management	2019/20 Q4	12
Review of Framework Supporting released Under Investigation	2019/20 Q4	1
Review of Forensic Services Delivery Framework	2019/20 Q4	1
Key Financial Systems – Expenses	2019/20 Q4	6
MPS Counter Fraud Arrangements	2019/20 Q4	3

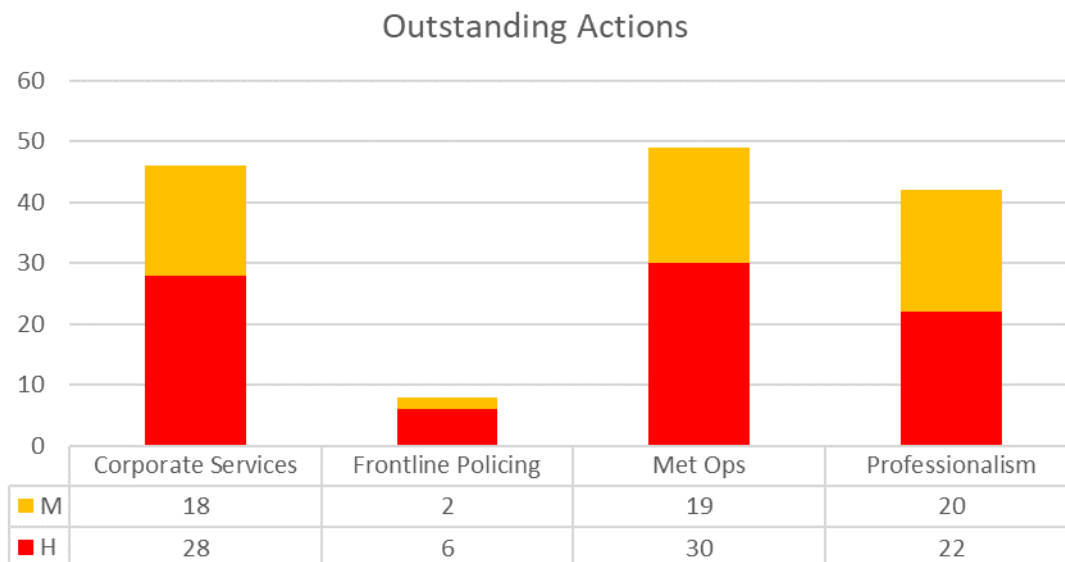
- 1.7. To ensure a continued focus on audits with a limited grading, all leads for limited audits provide Risk and Assurance board and audit panel with a one page brief. This details current and planned activity to address the risks and recommendations from the audit and to provide assurance to board on the way ahead for this area.



- 1.8. We requested updates on 172 recommendations, (this does not include those areas audited within the last update cycle) and received a 45% response rate. This is a decrease in the number of returns compared with last quarter (80%), however processes have been put in place this quarter to ensure COG meetings and risk boards are sighted on outstanding actions as well as a number of nominated SPOCs within the business who will assist with actively encouraging regular reporting. So we should see an improved engagement rate in the New Year.
- 1.9. All Chief Officers receive a list of outstanding actions as part of the update cycle and remain ultimately responsible for the timely updates and action progress. Risk and Assurance Board representatives are asked to continue to support the engagement in this process to reflect the work happening in the business to address these risks and ensure we hold the most current update for each high risk action.

**Agreed actions by business area**

- 1.10. The 145 outstanding actions pertain to 27 audits. 54 are in response to both medium and high risk in “limited assurance” reports and 91 to address high-risk actions from all reports. Distribution by business group is as follows:



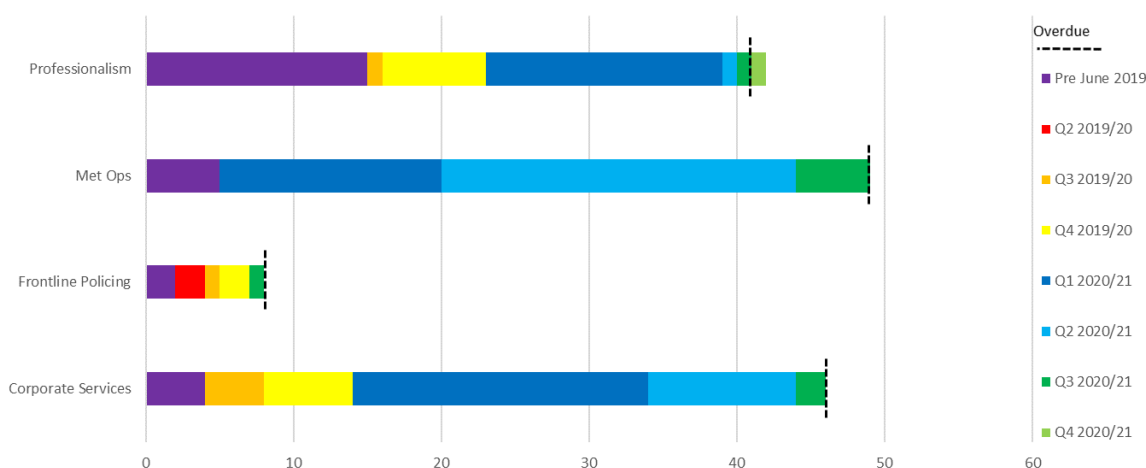
- 1.11. Met Operations have the most outstanding actions with an additional 4 received this quarter from the *Review of Forensic Services Delivery Framework* follow-up audit. This rise in actions can be explained by an increase in audit activity in this area over the last 2 quarters, including 21 new actions arising from the Case File

Management – Disclosure and TSG Use and Deployment of Resources audits and 3 from the Public Order – Deployment and Cost Recovery follow up.

1.12. Corporate services continue to reduce their actions and now have 44 outstanding. This business area encompasses some of the higher audit risk areas in the Met (Finance, Commercial, and Safety & Health) and the nature of the business is likely to be an underlying reason for the volume of High Risk actions.

1.13. Digital policing have now delivered all outstanding actions.

*Open actions by business group and Quarter due delivery date:*



1.14. In the graph above, those shown to the right of the dotted line (light and dark green) are within the quarter due date, all others have past the original due date.

1.15. Whilst Met Operations have the most outstanding actions only 16 are currently overdue. However they did have a substantial forward pipeline with 16 actions due in December 2020. Work has been ongoing, driven by COG within this command to ensure a focused effort to complete these recommendations in a timely manner. Therefore we can expect to see progress with these actions at the next update cycle.

1.16. Professionalism had 12 actions due in November from the Framework Supporting Inclusion & Diversity Strategy audit. These are shown as green within Q3 2020/21 however they have now passed their due date.

1.17. Strategy and Governance will work with business groups to assist with local action planning and monitoring to ensure where possible the due dates are achieved, or a revised date is agreed with DARA.

*2020/21 Q3 current position – November 2020*

Business Group	Actions past due date (Q3)	
	Total outstanding	% overdue
Corporate Services	44	77
Frontline Policing	8	88
Met operations	49	32
Professionalism	42	95

- 1.18. Whilst Met Operations have the most outstanding actions they also have the lowest percentage of overdue actions. There has been a renewed focus within this business area to ensure updates are provided and risks addressed.
- 1.19. We now have 111 outstanding actions (past their original due dates), which is an increase of 9 since the last reporting quarter. The new overdue actions are from the Framework Supporting Inclusion & Diversity Strategy with a due date of November 2020.
- 1.20. Leads have proposed revised implementation dates for those actions where we are confident that appropriate activity has been identified and plans are in place to address the outstanding risks (81 of the 111). We are proposing that audit leads without revised dates revisit the original deadlines in conjunction with DARA.
- 1.21. There are 25 actions with a due date prior to March 2018 and all have a revised expected completion date. However, given how old these recommendations are it would be advisable for audit leads to engage with DARA to discuss if these are still relevant to the business and of concern to both the business area and DARA, or to determine whether they can instead be included as part of a future audit process.

**Delays in meeting due dates**

- 1.22. As part of the quarterly update we ask leads to provide us with the reason for any delays they experience meeting the original agreed action deadlines. To better understand the most notable delay themes, the chart below includes the delay reasons of both currently delayed and delivered (but delayed) actions. Since starting to collect this data we have had 100 responses (including those that are now shown as delivered), these key challenges could be broadly defined in the categories shown below:



- 1.23. The most frequently cited reason for a delay for those actions still outstanding is COVID-19 related. This was a new category introduced in quarter 1 in light of the pandemic which has had some impact on achieving agreed completion dates for some actions. These are due to postponed meetings, reporting delays and the prioritisation of activity elsewhere. However, it is worth noting that this reason

only makes up 21% of the responses and that most of these actions have already been allocated rearranged expected delivery dates. It is anticipated that there will be an upturn as the business continues to recover from the first phase of the pandemic.

- 1.24. The next highest category is that the action is 'dependent on another review (either internal or external)'. A number of actions within this category are recorded in the same audit, therefore we can assume that when the associated review is complete we should see progress on multiple actions.

#### *Delay reasons for current actions*

Delay Themes	Total
COVID-19 related delay	16
Dependent on another review (internal/External)	14
Updating Policy and guidance	9
Awaiting Chief Officer decision/Sign off	5
Included as part of a wider transformation programme	5
Embedding new process, policy or governance	4
Partnership/Multi-agency challenges	4
Resource challenges	4
Recruitment	3
Requires a new IT solution	3
Dependent on Connect	2
Ambitious completion date	1
Effectiveness of solution under review	1
Included in and superseded by a different project	1
Project delay	1
Grand Total	73

- 1.25. Continuing to analyse the reason for delays should provide us with a valuable insight into areas that may need further attention or any other changes we need to make in our approach to internal audit and the management of audit actions. It will also enable us to assist with identifying underlying issues, such as effects of organisational change or the impact of National or Governmental requirements that could affect the delivery of actions within agreed timescales.

#### **Forthcoming actions**

- 1.26. 46 actions need to be implemented within the next 12 months (compared to 72 last quarter), of which 28 are due by the end of December 2020 (16 within Met Operations and 10 within Corporate services). Strategy and Governance will highlight these to the relevant Risk and Assurance board member to ensure, where possible these are addressed within due date.

#### **Key Audit Themes**

- 1.27. We have aligned the key themes arising from the audits with the DARA auditor descriptors. Across all actions, a thematic analysis draws out the following recurring themes in terms of risks identified.



1.28. Over half of the key themes fall into Policy and Process and Management Oversight and reporting. We continue to regularly meet with DARA and have agreed to work together to provide more detailed key themes in order to gain more insight into specific issues and identify activities to address these moving forward.

**New Audits received last panel:**

1.29. Since the last audit panel we have received the findings from the following audits:

- Contract/Client Relationship Management – follow up
- Shared Services Connected Limited (SSCL) Contract – follow up
- Review of Forensic Services Delivery Framework

1.30. Both the Contract/Client Relationship Managements and the SSCL Contract follow ups were rated adequate with no high risk actions.

1.31. The Business Continuity Arrangements (follow up) and Framework Supporting Implementation of Data Protection (follow up) reports have been issued to the business, but have not yet been shared with Strategy and Governance as the reports are restricted. Work is underway with DARA to identify how we can be sighted on these outstanding actions and provide a full assurance picture to the business.

1.32. We have not received any Limited graded audits this quarter, however the leads for the B/OCU Budgetary Control Framework - Limited (Audit), received in July

have provided a brief of current and planned activity to address the audit risks and recommendations and to provide assurance on the way ahead for this area. This has been included within the appendices.

### **HMICFRS update**

#### **Covid-19 – HMICFRS position**

- 1.33. HMICFRS resumed appreciable inspection activity in September and since that time the Met has been involved in two inspections (public protest and Covid-19, both now complete), commenced significant preparatory work for the child protection inspection and received notification of two further thematic inspections before the end of the financial year. We have noted that while the March lockdown saw a complete cessation of HMICFRS Inspection activity, the current approach is noticeably different and we have expressed concerns about the cumulative demand of a number of important inspections. HMICFRS continue to operate, in the main, remotely due to coronavirus restrictions which, does present some challenges to the Met in terms of logistical arrangements i.e. IT access to our systems. Solutions are however being actively progressed to ensure efficient facilitation of all inspections.

#### **Force Management Statements**

- 1.34. Forces are returning to the drafting of FMS, and two FMS practitioners' event took place in September with HMICFRS. The formal submission date will be May 2021, but forces can submit it earlier if it fits better with planning schedules (and a number of forces are planning to submit in the next few months in order for the material gathered in spring 2020 to still be useful). HMICFRS's FMS template and guidance sent in January 2020 remain the same, only the submission date has changed. We intend to table the final draft to the Met Management Board in March 2021 and send it shortly afterwards – therefore work will now recommence in collaboration with the various Business Groups, led by Pierre Coinde. This work will also help feed in to the work being led by AC Jukes on the Met's Blueprint for 2029

#### **PEEL Inspection**

- 1.35. HMICFRS is changing the PEEL inspection programme methodology, moving to an intelligence-led continuous assessment approach. Inspections will no longer be scheduled in tranches. Instead, there will be a rolling programme of evidence collection – the 12-month evidence collection for the Met will commence at the end of in January 2021.
- 1.36. The new approach will see HMICFRS use evidence from the PEEL assessment, including the FMS; findings from thematic inspections; crime data integrity findings; progress against causes of concern and areas for improvement; and FLL knowledge and insight.
- 1.37. The 'final evidence gathering phase' (formally known as fieldwork) will take place in March 2022.



**Thematic inspections****National child protection inspection (lead AC Ephgrave)**

1.38. The suspension of all appreciable inspection activity in March 2020 stopped midway through our child protection inspection. We have now received notification that this inspection will be repeated in full, early in 2021. As usual, HMICFRS will complete a 'deep dive' audit of live and recent cases, as well as interviews and meetings with senior leaders, stakeholders and staff. This will be conducted in two phases, each lasting two weeks:

- i. Case audits - 11 - 22 January 2021
- ii. Fieldwork - 1 - 12 February 2021

1.39. Preparations are now underway to collate all the necessary documentation and data required. Due to the ongoing coronavirus restrictions, HMICFRS intend to conduct their interviews and focus groups remotely where possible and appropriate, and will follow the latest national requirements and regional guidance on safe working during the pandemic.

**Covid-19 Policing Inspection (Lead DAC Matt Twist)**

1.40. This inspection, which was predominantly held remotely, concluded on 30 October.

1.41. As the aim of this inspection is to assist the service with planning and improving policing responses in the response to the coronavirus pandemic, all 43 forces were required to provide data, collate documents and complete a self-assessment. Additionally a small number of forces were selected to have a deeper review against some specific areas. The Met was inspected against:

- i. preparedness, partnerships and strategic leadership;
- ii. police custody

1.42. As it is a national inspection, the final report will be an aggregation of themes and issues from all forces; it will not have any graded judgements and forces will only be referenced for identified areas of good practice.

1.43. HMICFRS aim to publish the thematic report in the early part of 2021.

**Public Protest inspection (lead Deputy Commissioner):**

1.44. In late September, the Home Secretary commissioned HMICFRS to conduct a thematic inspection into how effectively the police manage protests. This was to provide their independent view on protest-related issues (including proposals for additional police powers e.g. to seize 'lock-on' equipment) in advance of the Protection of the Police and Public Bill, the introduction of which is currently scheduled for January 2021.

1.45. The Met was selected as one of ten forces for this short-notice urgent inspection which sought to determine the following:

- i. How well do the police manage intelligence about protests?

- ii. How well do the police plan and prepare their response to protests?
  - iii. How well do the police collaborate in relation to protests?
  - iv. How effective are the decision-making processes and how do they affect the police response to protests?
  - v. Does the current legislation give the police the powers they need to deal effectively with protests?
- 1.46. The inspection consisted of a comprehensive document request and interviews with key individuals and concluded on 16 October.
- 1.47. From the evidence gathered across the ten forces inspected, HMI Matt Parr has written to the Home Secretary detailing HMICFRS's opinion on the five proposals for the Bill. A draft report is anticipated to be shared for critical read to CC BJ Harrington, DCC Pippa Mills (Essex Police) and DAC Laurence Taylor around February 2021 and the final report as soon as practicable after that.

**Fraud revisit inspection (lead AC Louis Rolfe):**

- 1.48. HMICFRS have notified us of their intention to carry out a revisit inspection on their published report 'Fraud: Time to Choose: An inspection of the police response to fraud'. They will review the progress made against the 5 areas for improvement (AFIs) and 16 recommendations made in that report.
- 1.49. The inspection will examine:
- i. to what degree the recommendations and AFIs have been implemented;
  - ii. where recommendations or AFIs have not been implemented, whether they remain relevant and necessary to improve the response to fraud;
  - iii. what barriers exist to implementing the outstanding recommendations and AFIs;
  - iv. what needs to be done to remove or minimise these barriers to achieving the outstanding recommendations and AFIs; and
  - v. to what extent has the implementation of the recommendations and AFIs led to improvements for victims reporting fraud?
- 1.50. The Met is one of 11 forces to be inspected; the inspection will also cover the 9 regional organised crime units and interviews with national leads and other interested parties. These include the NPCC coordinator for economic crime and representatives of the National Fraud Intelligence Bureau and the National Economic Crime Centre. In addition, along with all forces, we expect to receive a data request imminently.
- 1.51. HMICFRS will start the inspection on 22 February 2021 and it will last for 1-week.
- Sensitive Intelligence inspection (Lead AC Louisa Rolfe):**
- 1.52. HMICFRS intend to conduct a thematic inspection of the use of sensitive intelligence.

- 1.53. The inspection will seek to answer “*How efficient and effective are police forces and agencies at adopting a whole-systems approach in exploiting sensitive intelligence, to keep people safe?*”
- 1.54. It will examine:
- i. How well do policies, structures and processes enable sensitive intelligence to be managed, shared, and used in a way that is consistent, and compliant with relevant guidance and legislation;
  - ii. How effectively is technology used by forces and agencies to share or access sensitive intelligence in a timely and secure way;
  - iii. How does culture, training and the development of staff promote the effective management of sensitive intelligence; and
  - iv. How well do forces and agencies use sensitive intelligence to prevent and detect crime and reduce harm to the public?
- 1.55. The Met is one of six forces, five regional organised crime units (ROCU) and the NCA to be inspected.
- 1.56. HMICFRS will start the inspection on 8 March 2021 and it will last for 1 week.

**Op Larimar (lead DAC Matt Twist):**

- 1.57. HMICFRS are yet to determine how they will ‘reality check’ the work that has been done. However, this is not specific to this inspection as this is a challenge for all inspections in the current climate of the pandemic. Solutions are being sought as to how our Force Liaison Lead may be able to conduct the reality testing needed.

**HMICFRS Monitoring Portal**

**Current position**

- 1.58. The Monitoring Portal remains mostly for recommendations and not for all areas for improvement (AFI), therefore we are continuing to maintain our own tracker that contains both recommendations and AFIs. We continue to work with HMICFRS to develop the reporting products and ensure that our internal tracker correlates with their data.
- 1.59. The Monitoring Portal currently shows 111 open recommendations:

<b>Inspection theme</b>	<b>Total</b>
Vulnerability (including 13 specifically related to the NCPI programme)	51
PEEL	10
Stop & Search	1
Information management	1
Undercover Policing	17
Fraud	2
Integrated Offender Management	4
Roads Policing	6
Review of investigations into allegations of non-recent sexual abuse by prominent people (Op Larimar)	12
CPS	4
Police Integrity & Corruption	3

1.60. This quarter, HMICFRS has closed 1 recommendation from the PEEL inspections and 7 AFIs and 6 Recommendations have been submitted to our Force Liaison Lead for review for closure.

### Current open recommendations and AFIs – Met tracker

Inspection year	Met specific or Nationwide	Rec / AFI	Inspection name	Total open
2013/14	Nationwide	Rec	Undercover Policing	17
	Nationwide	Rec	Girls in the Criminal Justice System	1
	Nationwide	Rec	A joint inspection of the treatment of offenders with learning disabilities within the criminal justice system	1
2014/2015	Nationwide	Rec	Joint Inspection of the Provision of Charging Decisions	1
2015/2016	Nationwide	Rec	Online and of the edge	1
	Met	AFI	PEEL 2015 - Effectiveness, Leadership & Legitimacy	2
	Met	Rec	National Child Protection Inspection	6
	Met	AFI	Increasingly everyone's business (vulnerability)	1
2016/17	Met	AFI	PEEL – Efficiency & Legitimacy	1
	Met	AFI	PEEL – Effectiveness 2016	2
	Nationwide	Rec	PEEL Police Effectiveness 2016	1
	Nationwide	AFI & Rec	PEEL Spring - Efficiency, Leadership and Legitimacy Inspection	1
2017/18	Nationwide	Rec	Living in Fear	1
	Nationwide	Rec	PEEL – Effectiveness	2
	Nationwide	Rec	Understanding difference: the police's initial response to hate crime	3
	Nationwide	AFI	A progress report on the police response to domestic abuse	1
	Nationwide	AFI	Joint Inspection: Handling of Cases Involving Disability Hate Crime	2
	Nationwide	AFI	PEEL Spring - Efficiency Inspection 2017	1
	Met	AFI	Crime Data Integrity 2018	2
	Met	AFI	National Child Protection Inspection	1
	Met	AFI	North / North-East Cluster Custody	3
	Met	AFI	PEEL Autumn - Effectiveness Inspection 2017	2
	Met	AFI	PEEL Spring - Efficiency Inspection 2017	2
2018/19	Met	Rec	National Child Protection Inspection	1
	Met	AFI & Rec	PEEL (Integrated)	16
	Met	AFI	JTAI - of the multi-agency response to sexual abuse in the family in Islington	3

	Met	AFI	Unannounced inspection visit to police custody suites	10
	Nationwide	Rec	Policing and Mental Health - Picking Up the Pieces	3
2019/20	Nationwide	Rec	PEEL Spotlight report - Shining a light on betrayal - Abuse of position for a sexual purpose	2
	Nationwide	Rec	Evidence led domestic abuse prosecutions	4
	Nationwide	AFI & Rec	The poor relation: The police and CPS response to crimes against older people	4
	Nationwide	Rec	Counter-terrorism policing - An inspection of the police's contribution to the government's Prevent programme	4
	Nationwide	Rec	Roads Policing: Not optional. An inspection of roads policing in England and Wales	1
	Met	Rec	An inspection of the MPS's response to a review of its investigations into allegations of non-recent sexual abuse by prominent people (the Henriques report) [NB Op Larimar]	12
	Met	Rec	Joint targeted area inspection of the multi-agency response to children's mental health in Bexley	3

- 1.61. Due to the ongoing inquiry into Undercover Policing, none of the 17 recommendations that fall under HMICFRS's national thematic report from 2013/14 will be progressed at the time; HMICFRS has provided all forces with an agreed 'holding position' status for each recommendation.
- 1.62. All other recommendations continue to be actively progressed, and updated on a quarterly basis.
- 1.63. With regards to the remaining longstanding recommendations / AFIs, as for all recommendations, although we may request a recommendation to be closed, it is usually at the point of re-inspection that progress against recommendations is tested and for some of the older inspections, this has not been done. There is therefore some disconnect between the time we request the recommendation to be closed and it being reviewed and / or tested. The National Child Protection Inspection starting on 11 January 2021 will consider progress against the recommendations made in 2015/16, 2017/18 and 2018/19.
- 1.64. As described above, our FLL will begin a period of continuous assessment at the end of January 2021 ahead of our next PEEL inspection (scheduled for March 2022) and we anticipate that as a result of that assessment many of these outstanding recommendations will be closed.

**2 Equality and Diversity Impact**

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

**3 Financial Implications**

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

**4 Legal Implications**

There are no direct legal implications arising from this report.

**5 Risk Implications**

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

**6 Contact Details**

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

**7 Background papers:**

None