

MOPACMAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL

26 October 2020

MPS Audit and 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 over the last quarter.

Since last quarter's report, the Met has received 36 new DARA actions that meet this monitoring threshold. During the same period, 39 actions were implemented and are now proposed as closed. Of these, 16 are from original audits and 23 from follow-ups.

HMICFRS inspection activity has resumed following a suspension due the ongoing Covid-19 pandemic. They have revised their intended inspection programme and framework to focus proposed activity on supporting policing and the criminal justice system as it continues to respond to the pandemic.

Key Considerations for the Panel

The Panel should consider the breadth of audit activity taking place by DARA. The renewed focus on outstanding audit actions by colleagues in all business groups is having a positive impact with a much higher response rate and 97 actions closing in the last six months, some of which delivered on or before their due date. However, there is also an increase (of 20) in overdue actions.

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 Risk and Assurance Board update

Risk and Assurance Board met on 8 September 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.

2 Internal Audit update

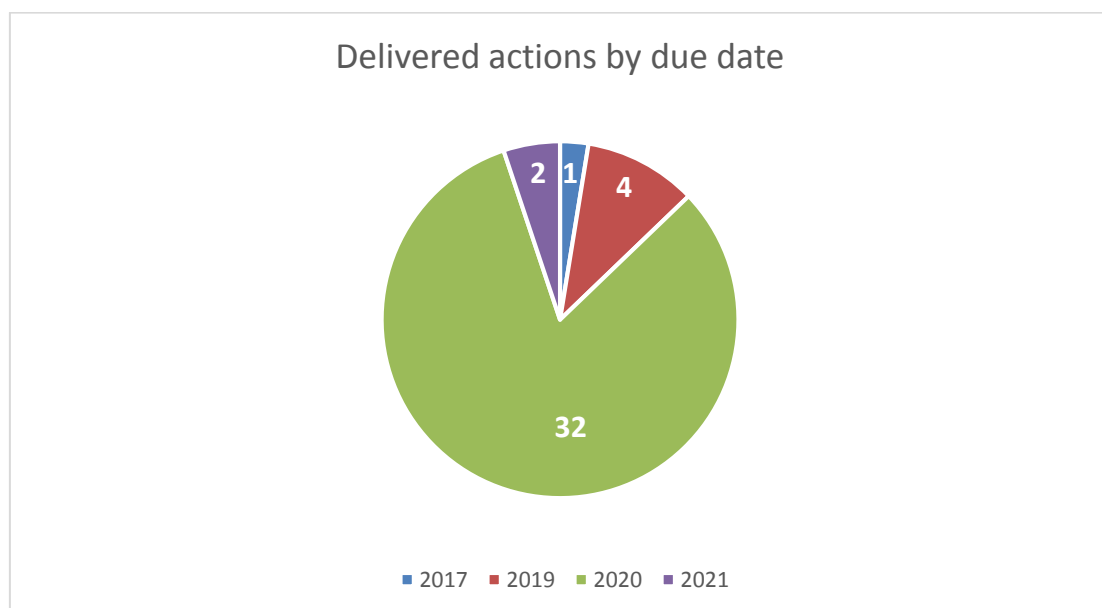
Strategy and Governance monitor Met progress on all high-risk actions from DARA's audits, as well as the medium-risk actions of any audit receiving a "limited" grading. Responsibility for monitoring implementation of all other lower risk actions sits with leaders locally.

Since last quarter's report, the Met has received 36 new actions that meet this monitoring threshold. During the same period, 39 actions were implemented and are now proposed as closed. Of these, 16 are from original audits and 23 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.

This is a reduction in the number of new actions since the last quarter and an increase in the number of actions submitted for closure. There has been a renewed focus on outstanding actions by the business, closing 97 in the last six months. This figure does not take into consideration those that are not monitored by Strategy and Governance but are actioned locally, so could be considerably more.

Of the 39 actions closed within the last quarter, 28 were due pre June 2020 and 11 delivered on or before their due date.

The total number of outstanding actions is now 186 compared to 195 last quarter.



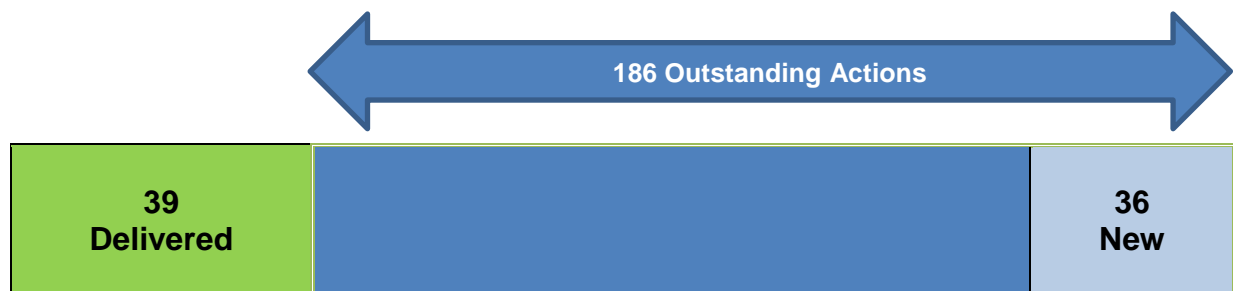
31 of the 39 actions recommended for closure were from Corporate Services, with 23 from Limited audits, demonstrating commitment to address areas that have been

identified as high risk. Digital policing also closed 6 actions from the Smarter working asset management Limited audit. Frontline policing closed 1 from the Met Knife Crime Strategy Delivery audit and Professionalism closed 1 action which had been outstanding for some time.

Actions delivered this quarter

Audit Title	Audit received	Actions closed
External Training and Development – Implementation of Framework for Use of External Providers and Value for Money	2017/18	1
Key Financial Systems Assurance 2017/18	2019/20 Q1	5
Framework Supporting Data Protection Compliance	2019/20 Q2	1
PSOP Access Controls	2019/20 Q3	7
MPS Counter Fraud Arrangements	2019/20 Q4	13
Key Financial Systems - Expenses	2019/20 Q4	1
Smarter Working Asset Management	2019/20 Q4	6
Met Knife Crime Strategy Delivery	2020/21 Q2	1
Key Financial Systems – Accounts Payable	2020/21 Q2	3
B/OCU Budgetary Control Framework	2020/21 Q2	1

To ensure a continued focus on audits with a limited grading, all leads for limited audits provide Risk and Assurance board 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.

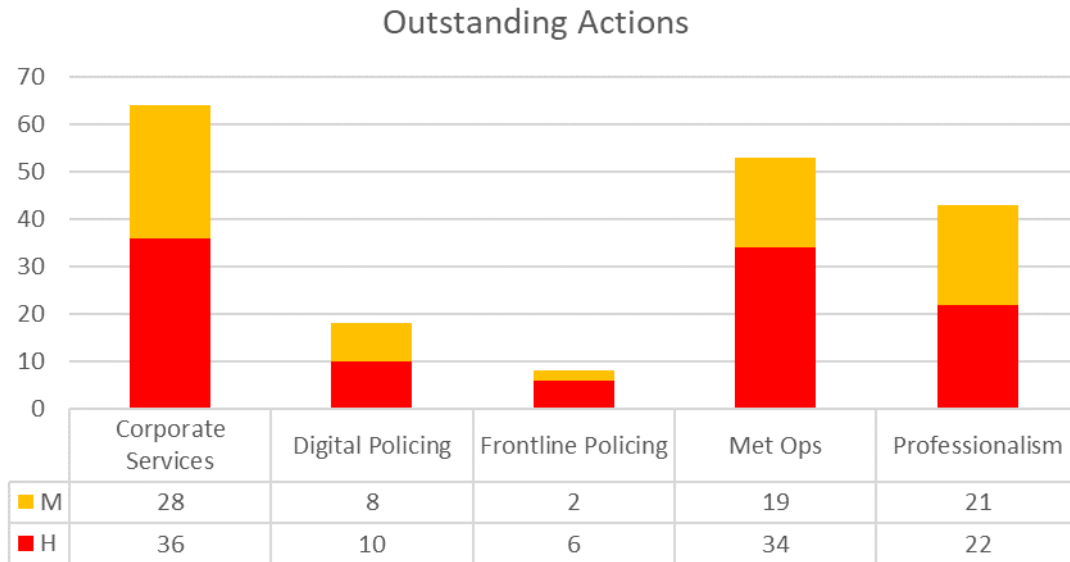


We requested updates on 193 recommendations, (this does not include those areas audited within the last update cycle) and received an 80% response rate. With both the pandemic related pressures and annual leave over the summer period this level of engagement with the update process is very positive. Risk and Assurance board representatives were 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.

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. These are also discussed as part of COG risk meetings. There has been a positive level of engagement by the business and a higher level of visibility of outstanding actions, leading to an improvement in the quality of the data we can monitor centrally.

Agreed actions by business area

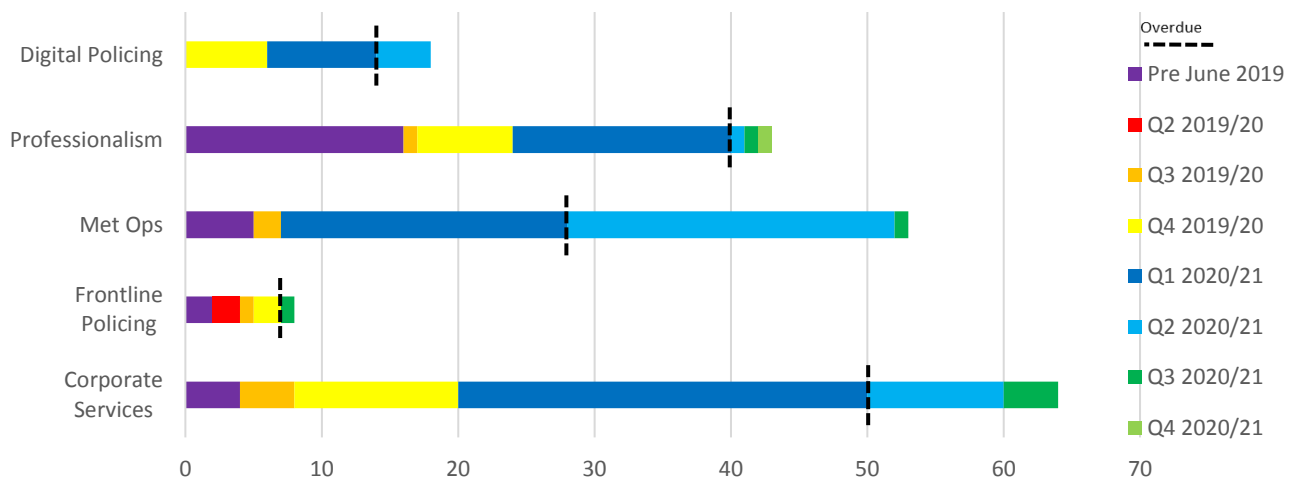
The 186 outstanding actions pertain to 32 audits. 78 are in response to medium-risk in “limited assurance” reports and 108 to address high-risk from all reports. Distribution by business group is as follows:



Corporate Services remains the area with the most outstanding actions with an additional 9 this quarter from the *B/OCU Budgetary Control Framework* audit. However, this business area encompasses some of the higher audit risk areas in the Met (Finance, Commercial, Safety & Health) and the nature of the business is likely to be an underlying reason for the level of High Risk actions.

Met Operations have also received 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.

Open actions by business group and due delivery date:



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

The substantial forward pipeline is evident for Met Operations. Strategy and Governance will work with Met Ops 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 Q2 current position

Business Group	Actions past due date (Q2)	
	Total outstanding	% overdue
Corporate Services	64	72
Digital Policing	18	83
Frontline Policing	8	88
Met operations	53	36
Professionalism	43	63

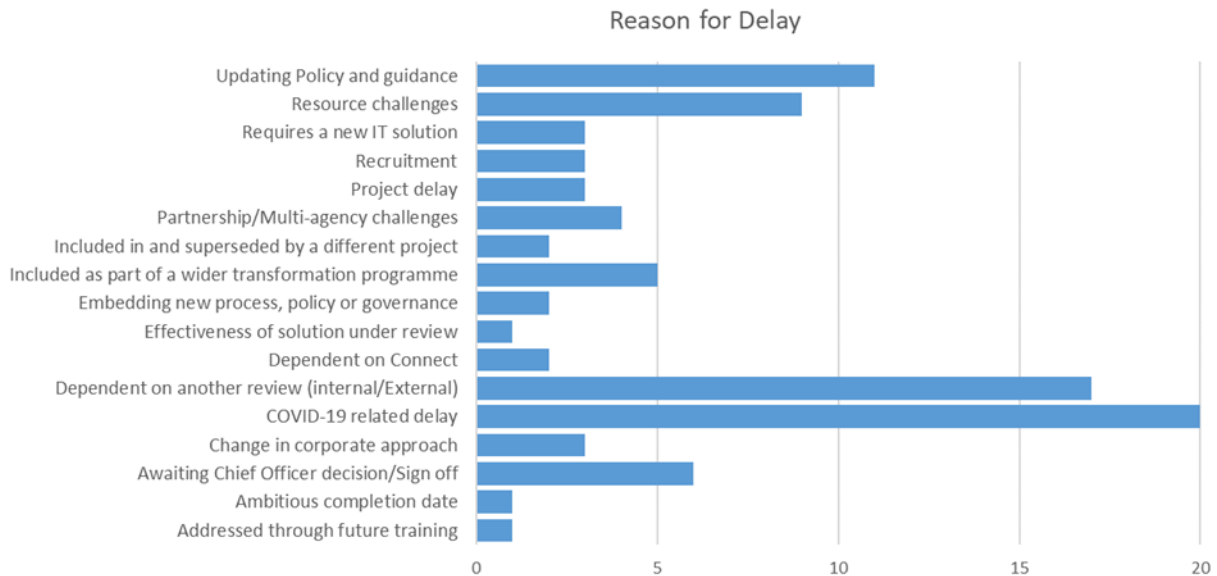
Corporate services is the area with the most outstanding actions but the senior leadership team have increased their efforts in ensuring these are reviewed regularly and that activities are in place to address the risks and their efforts are reflected in the number closed this quarter.

We now have 102 outstanding actions (past their original due dates), which is an increase of 20 since the last reporting quarter. The new outstanding actions sit across 7 audits and therefore can't be attributed to one area. 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 (63 of the 102). It may be useful for audit leads without revised dates to revisit the original deadlines in conjunction with DARA.

There are 26 actions with a due date prior to March 2018. 23 of these have revised future due dates, 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.

Delays in meeting due dates

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 understand better 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 93 responses (including those that are now shown as delivered), these key challenges could be broadly defined in the categories shown below:



The most frequently cited reason for a delay this quarter is COVID-19 related. This is a new category introduced last quarter 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 most of these actions have already been allocated rearranged dates.

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 from the same audit, therefore we can assume that when the associated review is complete we should see progress on multiple actions.

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

72 actions need to be implemented within the next 12 months (compared to 94 last quarter). Of these, 34 fall within the remit of Met Operations with 13 from the *Case File Management - Disclosure* Limited audit and 8 from the *TSG Use and Deployment of Resources* Limited audit, both of which were only received last quarter.

Corporate Services have 18 due with 8 of those from the B/OCU Budgetary Control Framework. Again this report was only finalised in August, an action plan and progress achieved to date will be reviewed at the Risk and Assurance Board in December. We will work with Met Operations and Corporate Services ensure we have a robust tracking mechanism and clearly defined action plans in order to ensure these deadlines are met.

Key Audit Themes

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.



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 since the last Audit Panel

Since the last Audit panel we have received the findings from the following audits:

- Key Financial Systems – Accounts Payable – Adequate (Follow-up)
- Public Order – Deployment and Cost Recovery - Adequate (Follow-up)
- TSG Use and Deployment of Resources – Limited (Audit)
- Case File Management – Disclosure - Limited (Audit)
- B/OCU Budgetary Control Framework * - Limited (Audit)

Areas who have received a Limited graded audit 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. These have been included within the appendices.

The Assistant Commissioner for Met Operations presented both the TSG and Case File Management Limited audit progress reports to Risk and Assurance board. The first identified risk in the TSG audit has now been dealt with and the other risks have either been successfully completed, or work is ongoing to address the risks. Overall, significant process has been made and recommendations met.

Work is continuing within Case File management and in particular help to officers and resourcing. The impact of these interventions will be monitored through Performance Board.

*The B/OCU Budgetary Control Framework audit was only received at the end of July and action plans are currently being formalised. It was agreed at Risk and Assurance board in September that these would, this will be tabled at the December Board.

3 HMICFRS update

Covid-19 – HMICFRS position

HMICFRS announced on 7 July 2020 their intention to resume appreciable inspection activity in October 2020. They have already resumed other activity such as the spring data collection (delayed from April) and an additional summer data collection (covering April-June 2020).

They have revised their intended inspection programme and framework to focus proposed activity on supporting policing and the criminal justice system as it continues to respond to the pandemic.

HMICFRS further announced on 27 August 2020 of their intention to hold a Covid-19 policing inspection; preparatory work commenced in September (detailed below). In the New Year, they will then begin to resume their core programmes (PEEL, child protection, custody, and the joint inspection programme).

Risk and Assurance Board recognise the value of inspection activity and are engaging with HMICFRS on how best to manage the increased demands (and potentially reduced resources) related to Covid-19, given that in March HMICFRS suspended all inspection activity.

Force Management Statements

The FMS 2020 was originally set a deadline for May 2020, but HMICFRS ceased all inspection activities during Covid-19 and removed that deadline. Workshops took place in September to update forces: the new deadline has been set for May 2021, with an expectation that forces should align the FMS with their planning cycle (and may well therefore want to submit earlier).

We have been using our FMS work undertaken earlier in the year to inform our Spending Review argument, to aid our business planning and also help us as a senior leader team in thinking about the future for policing London. As set out in the September workshops, the FMS is structured in four steps – and the following were highlighted as areas to re-inforce:

- **Step 1:** HMICFRS asks for more analysis and detail in the areas of highest risk, including future demand and “hidden demand” / potential future demand. Covid-19 has made the demand forecasting aspect of the FMS more challenging.
- **Step 2:** FMSs traditionally have a good level of information capacity and capability, but forces are less good at setting out other elements (performance, condition, serviceability, wellbeing and security of supply) so we will work to strengthen this.

- **Step 3:** asks forces to explain the expected impact of changes they are implementing - including the cost of change (i.e. stronger financial information is required) as well as the expected impact.
- **Step 4:** asks forces to scope what demand is not being met – due to resource limitation.

Thematic inspections

Covid-19 Policing Inspection (Lead DAC Matt Twist)

This national inspection will assess and identify the following:

- how policing is responding to the Covid-19 crisis;
- what is working well and what is being learnt;
- how the sector is dealing with the problems it faces; and
- opportunities to make sustainable improvements to the service.

The intended aim of the inspection is to assist the service with planning and improving policing responses for any resurgence of Covid-19. This will be a complex inspection and as such they have developed a hybrid plan for a thematic inspection and that will be Covid-19 specific and will not include any detailed assessments of policing responses and policies in existence prior to the pandemic being declared. Graded judgements will not be issued.

Evidence will be gathered from all 43 forces in England and Wales through the use of a specific document review, a self-assessment and the data capture from the aforementioned summer data return. HMICFRS will assess:

- i. preparedness, partnerships and strategic leadership;
- ii. policing themes – vulnerability, investigations, reporting (requests for service), enforcement;
- iii. (and wider 4Es approach) and wellbeing; and
- iv. police custody.

The Met is one of a small number of forces selected to have a more in-depth (mainly remote) inspection commencing on 26 October; the area of focus for the Met will be preparedness, partnerships and strategic leadership and police custody.

HMICFRS intend to disseminate their findings in or around November 2020. This will be followed by the publication of a more detailed national thematic report in early 2021.

Public Protest inspection (lead Deputy Commissioner):

The Home Secretary commissioned HMICFRS to conduct a thematic inspection into how effectively the police manage protests. This is in advance of the Protection of the Police and Public Bill, the introduction of which is currently scheduled for January 2021. As the Bill is likely to include proposals for additional police powers e.g. to seize

'lock-on' equipment, HMICFRS have been asked to offer their independent view on these and other protest-related issues. As a result, this urgent inspection of ten forces, of which the Met is one, took place w/c 12 October. The final report is expected to be presented to the Home Secretary by the end of November.

National child protection inspection (lead AC Ephgrave):

The suspension of all HMICFRS inspection activity in March meant that the fieldwork phase of this inspection (scheduled to take place 16 March - 3 April 2020) did not happen. We have now received notification that HMICFRS will start afresh in the New Year, conducting case-audits 11 - 22 January 2021 and fieldwork 1 - 12 February 2021. Substantial activity to provide HMICFRS with the documents and data required for the inspection has begun.

Op Larimar (lead DAC Matt Twist):

The monitoring portal has been updated with the formal response for each of the 12 recommendations, which we consider to be complete, albeit some elements require continuous and ongoing activity to further embed change. We await HMICFRS's review and clarification how and when they will determine whether sufficient work has been done to address the recommendations, but we understand there is no intention to have a full re-inspection.

HMICFRS Monitoring Portal

Current position

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. This is an improving picture, however there are still some technical issues with the Monitoring Portal which are challenging.

The Monitoring Portal currently shows 112 open recommendations.

Inspection theme	Total
Vulnerability (including 13 specifically related to the NCPI programme)	51
PEEL	11
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

This quarter, HMICFRS has closed 17 recommendations from the Vulnerability and PEEL inspections.

A further 2 recommendations and 3 AFIs have been submitted to HMICFRS for review for closure. These have not yet been reviewed.

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	5
	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	1
	Nationwide	Rec	PEEL Police Effectiveness 2016	1
	Nationwide	AFI & Rec	PEEL Spring - Efficiency, Leadership and Legitimacy Inspection	3
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	4
	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	4
	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)	18

	Met	AFI	JTAI - of the multi-agency response to sexual abuse in the family in Islington	4
	Met	AFI	Unannounced inspection visit to police custody suites	10
	Nationwide	Rec	Policing and Mental Health - Picking Up the Pieces	4
	Nationwide	AFI	Fraud: Time to Choose	4
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	5
	Met	AFI	Joint targeted area inspection of the multi-agency response to children's mental health in Bexley	3

Undercover Policing - 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.

All other recommendations continue to be actively progressed, and updated on a quarterly basis.

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 next National Child Protection Inspection scheduled for January 2021 will consider progress against the recommendations made in 2015/16, 2017/18 and 2018/19.

Our FLL will begin a period of continuous assessment in early 2021 ahead of our next PEEL inspection (date of which is yet to be determined) and we anticipate that as a result of that assessment many of these outstanding recommendations will be closed.

3 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.

4 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.

5 Legal Implications

There are no direct legal implications arising from this report.

6 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.

7 Contact Details

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

8 Background papers:

None