

**M O P A C**

MAYOR OF LONDON  
OFFICE FOR POLICING AND CRIME



## **MPS-MOPAC JOINT AUDIT PANEL 28 March 2022**

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### **Anti-fraud, Bribery and Corruption and Counter Corruption and the Daniel Morgan Independent Panel Report**

Report by: Cmdr. Jonathan Savell

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#### **Report Summary**

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

The information contained in this document is an interim summary pending the publication of the HMICFRS report publication on the 22<sup>nd</sup> March 2022

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

This is for awareness only at this stage, a comprehensive update will follow when the HMICFRS report becomes public knowledge.

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

The MPS cannot comment fully until the HMICFRS release their inspection report

##### **Recommendations**

As this is an interim update no recommendations are being made at this time to the Panel

**1. Supporting Information**

**Background**

- 1.1. Update on the action from October 2021: The MPS to report to the March 2022 meeting on:
- i. **Its Anti-fraud, Bribery and Corruption Strategy and its Counter Corruption Strategy, indicating how those strategies had been shaped by the Daniel Morgan Independent Panel Report**
- 1.2. Strategy updates - The Audit Panel have received a comprehensive update on the Anti-fraud, Bribery and Corruption Strategy (ABCS) which is separate to the MPS Counter Corruption Strategy (CCS).
- 1.3. The ABCS is directed toward internal issues and the proper use of public funds.
- 1.4. The CCS is based on the national strategic intelligence assessment. The priorities that have been adopted nationally are:
- Sexual misconduct/abuse of a position for a sexual purpose
  - Theft and Fraud
  - Unauthorised disclosure of law enforcement information
  - Drug use and supply
  - Inappropriate and notifiable associations
  - Organised Crime – threat of corruption through infiltration
  - Social Media

**How those strategies had been shaped by the DMIP Report**

- 1.5. The Daniel Morgan Independent Report made a series of recommendations, some of which relate to the areas of disclosure of information, inappropriate and notifiable associations and vetting and its role in countering threats of corruption through infiltration. The below highlights three specific recommendations that impact upon the CCS and sets out what the MPS response has been.
- 1.6. **Recommendation** - Metropolitan Police must ensure that the necessary resources are allocated to the task of tackling corrupt behaviour among its officers.
- 1.7. MPS Response - In response to the recommendation a review has been undertaken into the resourcing and capacity of the DPS. Through the Rebuilding Trust actions there has been further investment in the DPS and resourcing plan in place to meet strategic priorities for 2022/23 based on the above strategy. This includes an uplift in resources in DPS intelligence, extra teams dedicated to investigation into police perpetrated domestic abuse and sexual assault and additional resource for the prevention and learning team.
- 1.8. **Recommendation** - Notwithstanding the assurance received by the Panel from the Metropolitan Police in December 2020, the Metropolitan Police should remain vigilant at all times to ensure not only that it vets its employees in accordance with its new measures, but also that it has adequate and effective processes to establish whether its staff are currently engaged in crime.

- 1.9. MPS Response- The following activity has been undertaken:-
- Vetting capacity and demand reviewed.
  - Staff increase in Vetting Unit increasing capacity.
  - Dedicated vetting renewals team established.
  - Vetting backlog significantly reduced and within tolerance.
  - Escalation process in place to remove IT and building access if evidence of non-compliance.
- 1.10. **Recommendation** - All police officers and police staff should be obliged to register in confidence with the Chief Officer of their police force, at either their point of recruitment to the police force or at any point subsequent to their recruitment, their membership of any organisation, including the Freemasons, which might call their impartiality into question or give rise to the perception of a conflict of loyalties.”
- 1.11. Membership of any organisation which calls into question an officer’s impartiality should be notified under a force’s Notifiable or Declarable Associations policy. Historically the issues of a register of membership of the Freemasons has been considered within policing. It is of note that the report is specific in its detail that no evidence of Masonic influence was found.
- 1.12. MPS response - The following Met polices are relevant when considering this issue:
- Regulation 6 of the Police Regulations Act 2003 states that; ‘no restrictions other than those designed to secure the proper exercise of the functions of a constable shall be imposed by the police authority or chief officer on the private life of members of a police force.
- 1.13. This is supported by two standard operating procedures (SOP):
- Business Interests, Secondary Employment and Political Activities. This contains reasonable restrictions to enable the proper exercise of the functions of a constable. These include restrictions on political activity (e.g. British National Party (BNP) membership).
  - Declarable Associations (DA). This was introduced to mitigate further risk which states that a member of the MPS must always notify an association with a person, group or organisation where they know, consider or suspect that they are associated with criminality, persons who have been dismissed or required to resign from a police service or other law enforcement agency, and persons including former police officers who are working in related fields of employment i.e. private investigation, the security sector.
- ii. The HMICFRS inspection of anti-corruption capabilities**
- 1.14. At time of writing the HMICFRS report into the DMIP response and counter corruption has yet to be finalised. An early draft for factual accuracy has been responded to and the MPS welcome any further recommendations that the

HMICFRS has that will support its counter corruption work. The HMICFRS report is expected week commencing 21 March 2022.

**iii. Its interim report on implementing the recommendations of the Daniel Morgan Independent Panel.**

1.15. The final response to the DMIP report is expected to be published on 17 March 2022.

1.16. Following the publication of both reports and further update can be provided to the Audit Panel to complete the action update.

**2. Equality and Diversity Impact**

N/A as interim update

**3. Financial Implications**

N/A as interim update

**4. Legal Implications**

N/A as interim update

**5. Risk Implications**

N/A as interim update

**6. Contact Details**

Cmdr Jonathan Savell – Head of Professional Standards

**7. Appendices and Background Papers**

**Appendix 1 – NA**