



## MPS-MOPAC JOINT AUDIT PANEL

### 27 July 2020

## **MOPAC Annual Governance Statement 2019/20 and Improvement Plan Update**

Report by: The Director of Strategy, MOPAC

### **Report Summary**

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

This report is presented to Audit Panel to provide an overview of MOPAC's approach to governance going forward, outline the key areas of improvement and the actions in place to address them.

#### ***MOPAC Annual Governance Statement 2019/20***

The 2019/20 Annual Governance Statement (AGS) at Appendix A, sets out the framework, processes and procedures in place to enable the Mayor's Office for Policing and Crime (MOPAC) to carry out its functions effectively whilst ensuring the organisation continues to achieve value for money.

#### ***Governance Improvement Plan 2020/21***

The Governance Improvement Plan is a live improvement plan bringing together the improvements identified in the AGS 2019/20 with those carried forward from the Governance Improvement Plan 2019/20 (last year).

This report provides a year-end review on MOPACs Governance Improvement Plan, showing completed actions and those that will carry forward into the 2020-21 plan. The full Governance Improvement Plan is included at Appendix B.

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

It is requested that the panel reviews the Annual Governance Statement, Governance Improvement Plan review and notes the progress made.

Within the Governance Improvement Plan, there are 14 work-streams carried forward into the new 2020/21 plan. MOPAC does not, however, believe there is significant risk in any of these.

## **Recommendations**

The Audit Panel is recommended to:

- a. Note the Annual Governance Statement for 2019/20
- b. Note the improvements being made in MOPAC Governance through the Governance Improvement Plan.

### **1. Supporting Information**

- 1.1. More detail on MOPACs approach to governance is set out in the two Appendices accompanying this report.
- 1.2. MOPAC has used the *CIPFA - Delivering Good Governance in Local Government guidelines* to conduct an assessment of its current position in respect of governance. For reference these are:
  - a) Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
  - b) Ensuring openness and comprehensive stakeholder engagement
  - c) Defining outcomes in terms of sustainable economic, social and environmental benefits
  - d) Determining the interventions necessary to achieve the intended outcomes
  - e) Developing MOPAC's capacity, including the capability of its leadership and of individuals in it
  - f) Managing risks and performance through robust internal control and strong public financial management
  - g) Implementing good practices in transparency, reporting and audit to deliver effective accountability
- 1.3. The results of this have been used to supplement the existing Audit recommendations within our Governance Improvement Plan. This approach has allowed us to identify some new areas of work to drive further improvement. These are summarised below.

### **Annual Governance Statement**

- 1.4. The Annual Governance Statement sets out MOPACs scope of responsibilities, roles, governance provisions and finally provides an assessment of where MOPAC is placed against the seven principles of the CIPFA framework.
- 1.5. The AGS identifies a number of key areas where MOPAC has improved and where our approach to governance is working well. Among this are;
  - The Police and Crime Plan continues to drive the work of MOPAC, with strong delivery across all programme areas.
  - Evidence-based insight continues to underpin and inform MOPAC policy at every level.
  - As the Covid-19 coronavirus pandemic took hold in March 2020, MOPAC responded well to the unprecedented challenges it

presented. This includes ongoing oversight of the MPS, supporting commissioned services to remain operational and convening partners and communities to help maintain the trust and confidence of Londoners in the policing response to Covid-19.

- The VRU has made good progress in driving forward a new public health approach to tackling violence and has invested £14.4m with defined outcomes in line with their objectives.
- Focus on investment decisions recommended to MOPAC by the MPS, particularly given the significant decisions required in many areas of the MPS transformation programme, such as strengthening local policing, transforming investigations and prosecution, and transforming the MPS estate.
- London's Victims' Commissioner, Claire Waxman, continues to drive work to meet the recommendations of her [review of compliance with the Victims' Code of Practice \(VCOP\)](#), published at the end of 2018/19. In July 2019, Claire published a new [review of rape cases in London](#) and put forward a suite of recommendations and is now working with partners to see that they are acted upon.
- During 2019/20 MOPAC launched a new campaign aimed at tackling female genital mutilation (FGM) in London.
- Responding at pace to emerging safety issues arising from Covid19, MOPAC has invested an additional £1.5m to provide victims of domestic abuse with safe accommodation and support if they need to flee their homes during the coronavirus pandemic. Plus, MOPAC has contributed £500,000 in emergency funding to London's Emergency Coronavirus Response Fund.
- MOPAC has continued to make significant progress in developing the capacity and capability of its leadership and staff through the People Strategy.
- MOPAC has a mature and well-embedded decision-making process.
- MOPAC has continued to adapt well to GDPR requirements, taking external legal advice to ensure we remain compliant

1.6. In line with our commitment to continually improve we have also identified key areas for improvement. These include;

- MOPAC will respond to and implement the recommendations of the LCRB sub-board governance review.
- MOPAC's E&I team must work to provide an alternative, refreshed, evidence base to reflect the post-Covid world.
- As London emerges from lockdown and into what is likely to be a long recovery period, the VRU will develop a strategy for supporting vulnerable young people who might now be more likely to become involved in violence and/or be exploited post-lockdown
- The VRU will do more in areas of programme development, partnership growth, data sharing, and evaluation.
- MOPAC will respond to the recommendations of the review conducted of its procurement and grant award processes.
- As MOPAC transitions from Covid-19 response to Covid-19 recovery, we will develop an Estates, IT and workforce plan (a subset of the wider

People Strategy) to focus on supporting staff capacity and capability over the next 12 months.

- MOPAC will continue to work to address the issues raised by the Black Lives Matter (BLM) movement, how that relates to the work of both the MPS and MOPAC and how it impacts the black community and black colleagues.
- MOPAC will maintain and build on a strong emphasis on diversity and inclusion, through training and leadership.

### **Governance Improvement Plan**

- 1.7. Appendix B, the Governance Improvement Plan for 2020/21, collates MOPACs areas for improvement and sets out their source, the specific recommendation they relate to, actions taken or proposed, action owners and a proposed completion date. The areas for improvement identified have been compiled from:
  - Outstanding actions from the Governance Improvement Plan 2019/20 which are carried forward into this year's plan.
  - Areas identified in the Annual Governance Statement (AGS) in sections marked "What could be improved".
  - The DARA Internal Audit Annual Report 2019/20 and subsequent inspection reports.
- 1.8. This is a live document, refreshed monthly for internal review purposes, allowing leads to set realistic timescales for improvement actions and to capture in year DARA recommendations. A comprehensive annual refresh is undertaken to include AGS outputs. This is presented for the panel's consideration.

### **Overview**

- 1.9. As at the end of 2019/20, 39 (74%) improvement actions were complete and a further 14 (26%) reported as on track but with target dates that fell in 2020/21. These have been carried over into the current GIP.
- 1.10. There are 31 work-streams captured in the MOPAC Governance Improvement Plain for 2020/21, including 17 new improvement actions identified from the AGS process.

### **Key Achievements**

- 1.11. Since last reporting to Audit Panel in January, work continued to progress improvements in MOPAC's governance and control mechanisms. Since the last update, a further 19 areas of improvement have been completed. All completed improvement actions can be seen in Appendix B. Some highlights are included below:
  - Full roll-out of anti-fraud training to all MOPAC staff (A3)
  - Strengthened relationships with communities across London from a variety of events held between Sept19-Jan20 (B3)

- SLA in place to publish minutes and papers for boards within set timescales, increasing transparency. (G4)
- VCOP review of progress against recommendations complete. Action plan and monitoring in place to ensure compliance (G6) & (G7).
- A regular update on publication timescales and compliance will be received at Governance and Risk Working Group going forward. (G8).
- Grants awarded, and grant information is published on MOPAC website to increase transparency (G11) & (G13).

**2. Equality and Diversity Impact**

Governance processes embed consultation in MOPACs approach and recognise that equality, diversity, and community engagement should be treated as strategic priorities

**3. Financial Implications**

There are no direct financial implications from this report.

**4. Legal Implications**

Under the Local Government Act 1999, MOPAC has a statutory duty to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. In discharging this overall responsibility, MOPAC is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the exercise of its functions, including a sound system of internal control and management of risk.

**5. Risk Implications**

The paper identifies the key risk areas in the Governance Improvement Plan and shows how these are being managed.

**6. Contact Details**

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**7. Appendices and Background Papers**

**Appendix A** – MOPAC Annual Governance Statement 2019/20

**Appendix B** – MOPAC Governance Improvement Plan – Official Sensitive

## Annual Governance Statement 2019/20

### 1. Introduction

The 2019/20 Annual Governance Statement (AGS) gives us the opportunity to explain the framework, processes and procedures in place which ensure that the Mayor's Office for Policing and Crime (MOPAC) carries out its work in accordance with the law and appropriate standards.

MOPAC is a corporation sole and has a responsibility to ensure that its business is conducted in accordance with the law and proper standards and that public money is safeguarded, properly accounted for and that the value for money (VfM) principles of economy, efficiency and effectiveness are strongly adhered to. MOPAC has a responsibility to ensure that public money is safeguarded and to carry out its functions efficiently and effectively in order to deliver value-for-money for taxpayers.

The Accounts and Audit Regulations (2015) as amended by the Accounts and Audit (Coronavirus) (Amendment) Regulations 2020, require MOPAC to conduct a review, at least once a year, on the effectiveness of its system of internal control. This statement represents MOPAC's report on the outcome of that review for 2019/20.

The business to be conducted by MOPAC is principally set out in the Police Reform and Social Responsibility Act 2011, with other statutory requirements set out in other Acts of Parliament. The Financial Management Code of Practice requires that MOPAC, similar to other Police and Crime Commissioners, also ensures that the good governance principles are embedded within the way that MOPAC manages its finances.

The Commissioner of Police of the Metropolis is an independent legal entity and also a corporation sole. The Commissioner is accountable in law to MOPAC for the delivery of efficient and effective policing, management of resources and expenditure by the Metropolitan Police Service (MPS). They are also responsible for delivering operational policing. The MPS has its own Annual Governance Statement supporting its own internal control and risk management framework.

Within the Statement is a review against our governance framework, a review of effectiveness of our governance arrangements and an action plan to address the governance issues raised.

## **2. Scope of Responsibilities**

MOPAC's responsibilities are set out in the relevant legislation. Overarching responsibilities include:

### **a) Overarching Duties**

MOPAC must secure the maintenance of the Metropolitan Police Service and ensure that it is efficient and effective. It does this by holding the Commissioner to account for the exercise of their functions including:

- the duty to have regard to the Police and Crime Plan;
- the duty to have regard to the national Strategic Policing Requirement;
- the effectiveness and efficiency of the Commissioner's arrangements for co-operating with other persons in the exercise of the Commissioner's functions;
- the effectiveness and efficiency of the Commissioner's arrangements under section 34 (engagement with local people);
- the exercise of the Commissioner's functions under Part 2 of the Police Reform Act 2002 in relation to the handling of complaints;
- the extent to which the Commissioner has complied with section 35 (value for money);
- the exercise of duties relating to equality and diversity imposed on the Commissioner;
- and the exercise of duties in relation to the safeguarding of children and the promotion of child welfare that are imposed on the Commissioner by sections 10 and 11 of the Children Act 2004;
- Responsibility for handling complaints against the Commissioner.

### **b) Information**

MOPAC is required by legislation to publish information which it considers to be necessary to enable the persons who live in London to assess:

- the performance of MOPAC in exercising its functions; and
- the performance of the Commissioner in exercising the Commissioner's functions.

Where the manner and timing of publication are specified in legislation MOPAC must comply with this. The information necessary to enable this must be published as soon as practicable after that time or the end of that period.

### **c) Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS)**

MOPAC is required to respond formally to HMICFRS reports. MOPAC comments, together with any comments submitted by the Commissioner and any response to those comments by MOPAC, must be published within 56 days of the publication of any report. If the published report includes a recommendation, MOPAC comments must include an explanation of:

- the action MOPAC has taken or proposes to take in response to the recommendation; or
- why MOPAC has not taken, or does not propose to take, any action in response.

### **3. Governance Framework**

This Annual Governance Statement is drawn up in line with the *CIPFA - Delivering Good Governance in Local Government*<sup>1</sup> guidelines, which build on the Nolan principles<sup>2</sup>.

The **MOPAC Governance Framework** (see figure 2) is modelled on the CIPFA produced *International Framework: Good Governance in the Public Sector* (the framework). It remains dynamic and subject to continuous improvement.

The Framework includes seven principles of a well-governed organisation. These are:

- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
- Ensuring openness and comprehensive stakeholder engagement
- Defining outcomes in terms of sustainable economic, social and environmental benefits
- Determining the interventions necessary to achieve the intended outcomes
- Developing MOPAC's capacity, including the capability of its leadership and of individuals in 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 framework enables MOPAC to monitor and evaluate achievements against its strategic objectives – outlined in the business plan and PCP – and it is against this framework we have evaluated effectiveness in this document for the year 2019/20.

Similarly to colleagues within the MPS, we are keen to apply these principles as they are seen in the diagram. C-G as the core principles of governance with A and B – key principles – underpinning it all.

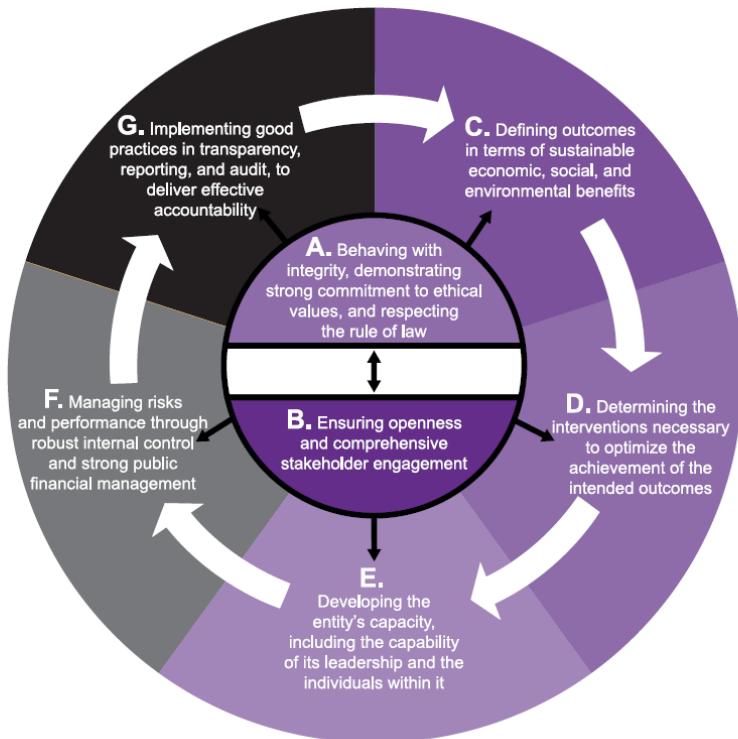
The **MOPAC Code of Governance** uses the framework as its base and ensures its principles are integrated into how MOPAC conducts business locally.

**Figure 2- International Framework: Good Governance in the Public Sector  
(CIPFA/IFAC, 2014)**

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<sup>1</sup> <http://www.cipfa.org/policy-and-guidance/publications/d/delivering-good-governance-in-local-government-framework-2016-edition>

<sup>2</sup> <https://www.gov.uk/government/publications/the-7-principles-of-public-life>



MOPAC can demonstrate that the systems and processes in place to support these governance provisions are:

- monitored for their effectiveness in practice via the [Quarterly Reports](#) to the Joint MOPAC and MPS Audit Panel and annually via this [Annual Governance Statement](#)
- Subject to [scheduled reviews](#) by the Directorate of Audit, Risk and Assurance (DARA) to ensure it remains up to date and fit for purpose
- Improved and actioned through the organisation via the [Governance Improvement Plan](#)

#### **4. Governance structures**

**MOPAC's governance arrangements** are set out in Appendix 1. These arrangements are how we effectively deliver our governance and scrutiny of objectives, operations and delivery.

The Mayor delegates day-to-day running of MOPAC to the Deputy Mayor for Policing and Crime, whose role is similar to that of an elected Police and Crime Commissioner elsewhere.

MOPAC uses and publishes a **Scheme of Delegation and Consent** which sets out approval delegations to ensure that decisions are made at the lowest level consistent with efficient and effective decision making, whilst ensuring that MOPAC, DMPC and the MPS are properly protected against the risks associated with being the individual held to account for all decisions made.

The Metropolitan Police Service (MPS) operates a number of Police Act 1996 s22 collaboration arrangements, including the hosting of the National Police Chiefs' Council (NPCC). A **s22 Collaboration Agreement** enables chief officers of police, local policing bodies and other parties to make an agreement about the discharge of functions by officers and staff where it is in the interests of value for money of their own and other police force areas. MOPAC has the responsibility to approve proposed s22 collaboration agreements involving MOPAC and the MPS.

MOPAC is required to produce an Annual Report which requires MOPAC to report on progress in relation to activities, achievements, the financial position, performance against PCP priorities and objectives and ensure that it is communicated publicly.

The 2019/20 Annual MOPAC report will be published in Summer 2020, to sit alongside the final AGS and the MOPAC accounts. It will be presented to a future PCC meeting for scrutiny.

## 5. Strategic Objectives

The Mayor of London's Police and Crime Plan (PCP) outlines the strategic priorities for policing and community safety in London, against which the Commissioner is held to account. To deliver the PCP launched in March 2017, MOPAC is clear about its priorities:

- A better police service for London,
- A better criminal justice service for London;
- Keeping children and young people safe;
- Tackling Violence Against Women and Girls and
- Standing together against hatred, intolerance and extremism.

These priorities were agreed following a significant consultation with the public, and in line with the requirements under section 6 (6) of the Police Reform and Social Responsibility Act 2011 (PRSR 2011). The consultation also included consulting with the Commissioner of Police of the Metropolis in developing the draft Plan, and consulting with the Commissioner on the amended Plan (further to responses to the consultation).

In accordance with section 6 (6) of the PRSR 2011 the Plan was also sent to the Police and Crime Committee of the London Assembly, who had the opportunity to question the Deputy Mayor for Policing and Crime (DMPC) at the Police and Crime Committee in January and February 2017.

The Committee responded by way of a report, to which MOPAC provided a public response. Further statutory consultation took place (further to section 42 (1) of the Greater London Authority Act 1999 ("the GLA Act 1999")) which included consulting with other functional bodies, London Borough Councils and the Common Council.

The agreed objectives are supported by a business plan and achievement against those objectives is reported throughout the year.

## **6. 2019/20 Context**

2019/20 was the third full year of delivery under the current Mayor's Police and Crime Plan (PCP) against which our business plan and governance arrangements are aligned. These ensure that the appropriate oversight is exercised in all key areas of business, both in terms of effectively discharging statutory and regulatory requirements, including those in the 2011 Act, and in meeting the requirements of the PCP.

This year saw the fast-paced development of the newly created Violence Reduction Unit (VRU) which brings together specialists from health, police, local government, probation and community organisations to tackle the underlying causes of violent crime. Governance arrangements for the VRU are included in the AGS for clarity.

At an Executive level, this was a year of considerable change within MOPAC, with the planned departure of the CEO and an interim CEO in place while recruitment to the substantive post was undertaken. The promotion of the existing CFO to interim CEO, and her subsequent planned departure resulted in three different CFO's over the year.

In March 2020, the growing impact of the Covid-19 coronavirus pandemic resulted in unprecedented change to the way the whole country operated. MOPAC was no exception and has had to adapt its ways of working as well as playing an important role in supporting London's response to the pandemic, working with the Mayor, the MPS at partner organisations.

MOPAC's agile working practices and recently updated business contingency plans have proven themselves fit for purpose and resilient in a critical situation. MOPAC has continued to operate and function well – introducing new or adapted arrangements where necessary, for example to facilitate remote working alongside new emergency structures and enhanced internal communications and support networks.

At the time the pandemic was declared, MOPAC was preparing to enter Mayoral pre-election period, with an election scheduled in early May 2020. Due to the pandemic, this election was postponed by the Government until May 2021.

Whilst tackling violence will remain a priority responding to Covid-19 and its impacts – supporting recovery and renewal for London, a new way of working for MOPAC staff and partners, and responding to disproportionality and the issues brought to the forefront by the Black Lives Matter movement – are likely to be the dominant themes for 2020/21, with the deferred Mayor of London and London Assembly elections in May 2021 punctuating the end of the reporting year.

### **Violence Reduction Unit (VRU)**

The formation of the VRU was announced by the Mayor in September 2018 in response to increasing violence in London since 2014. The VRU came into full operation in 2019/20, and is now delivering intelligence, support, and funding to help stabilise and reduce violence across London in the long term.

By the start of the 2019/20 period, VRU Director Lib Peck was in place and a review into homicides and serious violence incidents was commissioned. This fast-paced mobilisation has continued apace throughout 2019/20, with a diverse new team being recruited to develop and implement the VRU's strategy.

The VRU strategy takes a fundamentally different, public health approach to violence reduction – one where the institutions and communities that make up London act together to help identify and address the underlying causes of violence.

The VRU's activities are overseen by the VRU Partnership Reference Group, chaired by the Mayor, which ensures that partner views are at the heart of the mobilisation of VRU's work. The Group has met nine times since September 2018, six of which fell in the 2019/20 financial year. Membership of the group continues to be refreshed to ensure the VRU's work remains relevant and informed by the most appropriate professionals from across the capital. Membership of the group has also expanded to take into account the breadth of stakeholders working together across London to tackle violence.

The VRU is a partnership overseen by the Deputy Mayor for Policing and Crime, the Deputy Mayor for Social Integration, Social Mobility and Community Engagement (DMSI); and the Deputy Mayor for Education and Childcare (DMEC). The VRU's Director has a direct reporting line to the Mayor, and they meet on a quarterly basis.

MOPAC remains legally accountable for the decisions and operations of the VRU insofar as they relate to its responsibilities. The VRU is subject to MOPAC's scheme of delegation and consent. VRU staff who are employed are subject to MOPAC terms and conditions.

## **7. 2019/20 Review against the governance framework**

The following section provides an assessment of where MOPAC is placed against the seven principles of the CIPFA framework. As previously discussed, our reporting on this is against the principles C-G and then A and B, as key principles which underpin the rest.

- i) Defining outcomes in terms of sustainable economic, social and environmental benefits

### *What is working well?*

The [Police and Crime Plan](#) (PCP) continued to drive the work of MOPAC through 2019/20, with strong delivery across all programme areas.

Evidence-based insight underpins and informs MOPAC policy at every level. Work is continually tracked and measured, and MOPAC produces a [suite of interactive data dashboards](#) on its website, enabling the public and partners to engage with and interpret data on policing and crime in London.

Throughout 2019/20 we continued to strengthen and develop the work of the LCRB, with a review of LCRB sub-board governance now underway. This will consider whether the current structure remains fit for purpose and make recommendations as required to maximise delivery against partnership PCP commitments, wider MOPAC priorities, and future PCP development.

As the Covid-19 coronavirus pandemic took hold in March 2020, MOPAC responded well to the unprecedented challenges it presented. This includes ongoing oversight of the MPS, supporting commissioned services to remain operational and convening partners and communities to help maintain the trust and confidence of Londoners in the policing response to Covid-19.

### VRU

The VRU has made good progress in driving forward a new public health approach to tackling violence.

The data showed that, in 2019, violence cost 149 Londoners their lives and research commissioned by the VRU revealed that violence is costing the capital £3 billion per year.

Working with partners to obtain data and understand the current situation is key to determining future outcomes. A project with the Information Commissioner's Office is helping to break down organisational barriers to information sharing.

### *How did we respond to last year's recommendations?*

Last year's recommendations included a focus on project management of the PCP. Throughout 2019/20 MOPAC embedded more systematic programme management, business planning and risk management processes to track delivery across the PCP. In 2019/20 MOPAC commissioned a detailed review of project portfolio management (PPM) structures and processes to make improvements to deliver the next PCP. This review is due to report in 2020/21.

While MOPAC has good structures in place around the delivery and tracking progress on the PCP, last year's recommendations also included an emphasis on ensuring that MOPAC communicates to partners and stakeholders the outcomes and benefit of the work undertaken.

The [MOPAC Annual Report 2018/19](#), published in August 2019, drew on the conclusions of the previous Annual Governance Statement by placing a much greater focus on outcomes, highlighting both quantitative and qualitative data to explain the impact of MOPAC's work over the period.

In February 2020 MOPAC published a new iteration of its [Quarterly Performance Report](#) incorporating greater detail than ever before on the performance of its commissioned

services, including RAG ratings, outcomes information and commentary on performance over the rolling year.

There has been some improvement in communications but more work will be required in the Governance Improvement Plan 2020/21. With the VRU mobilising, work is also underway to ensure their workplan is clear and differentiated from core MOPAC work.

*What could be improved?*

MOPAC will respond to and implement the recommendations of the LCRB sub-board governance review, which is examining whether the current structure remains fit for purpose in order to maximise future delivery against partnership PCP commitments, wider MOPAC priorities, and future PCP development.

The Covid-19 pandemic has had a significant impact on many of the key indicators for crime and policing in London. The initial lockdown had a significant impact on certain crime types and it is likely that there will be longer-term impacts on survey measures (for example trust and confidence) as well as further changes as lockdown measures are eased. This presents a challenge to our usual points of reference in defining outcomes of MOPAC's work. Year-on-year comparisons will become impossible, or irrelevant.

MOPAC's E&I team must work to provide an alternative, refreshed, evidence base to reflect the post-Covid world.

VRU

For the VRU, Covid-19 is having a profound effect on partners' – and youth/parenting services' – ability to deliver interventions and services that support young people and their families. One of the main priorities for the VRU as London emerges from lockdown and into what is likely to be a long recovery period, is to develop a strategy for supporting vulnerable young people who might now be more likely to become involved in violence and/or be exploited post-lockdown. We have assembled a group of external stakeholders to assist with this new area of work.

- ii) Determining the interventions necessary to achieve the intended outcomes

*What is working well?*

The investment decisions recommended to MOPAC by the MPS are scrutinised at the Investment Advisory and Monitoring Meeting to ensure they are aligned with the Police and Crime Plan and/or other statutory requirements for policing, and that they contribute to achieving an effective and efficient police service for London. We put considerable focus in this area, particularly given the significant decisions required in many areas of the MPS transformation programme, such as strengthening local policing, transforming investigations and prosecution, and transforming the MPS estate.

Evidence and Insight (E&I) is the dedicated analysis and research function within MOPAC. The team works across the organisation, providing in-depth analysis and a robust evidence base across the breadth of our work areas. The research and analytics capabilities within E&I are varied, and include innovative analysis of crime and criminal justice, data visualisation and dashboards, large-scale surveys, data analysis, social research and programme evaluations. Use of data and research is hardwired into the organisation, and evaluation and evidence-based insight underpins and informs MOPAC policy at every level.

In preparation for the next PCP and recognising the significant change to society brought about by Covid-19, MOPAC's E&I team is working with partners including the MPS, London Councils and academics to develop a refreshed evidence base and strategic assessment of crime in London.

London's Victims' Commissioner, Claire Waxman, continues to drive work to meet the recommendations of her [review of compliance with the Victims' Code of Practice \(VCOP\)](#), published at the end of 2018/19. In July 2019, Claire published a new [review of rape cases in London](#), based on detailed analysis of procedural data and consultation with victims and front-line professionals. Based on her findings, Claire put forward a suite of recommendations and is now working with partners to see that they are acted upon.

During 2019/20, delivering a commitment in the [Mayor's VAWG Strategy](#), MOPAC launched a new campaign aimed at tackling female genital mutilation (FGM) in London. '[FGM Stops Here'](#) was developed in close consultation with communities most affected by this practice and steered by a group of leading experts and activists to help ensure that the campaign was targeted correctly, used the right language and would have credibility within affected communities.

Responding at pace to emerging safety issues arising from Covid19, MOPAC has invested an additional £1.5m to provide victims of domestic abuse with safe accommodation and support if they need to flee their homes during the coronavirus pandemic. Plus, MOPAC has contributed £500,000 in emergency funding to London's Emergency Coronavirus Response Fund.

#### VRU

After a strong focus, over the last year, on building its data and evidence base, the VRU and partners are now focused on drawing on evidence of what works in order to develop responses to violence and drive the adoption of effective approaches.

The VRU has invested £14.4m with defined outcomes in line with their objectives. These funds have been directed towards projects and organisations working locally.

As many interventions were based in local settings, whether in schools, PRUs, hospital, or in communities, the Covid-19 pandemic and associated measures have meant that proposed interventions are having to be reformulated to take account of closures and

social distancing restrictions.

*How did we respond to last year's recommendations?*

Greater demands for professional advice on procurement led to MOPAC commissioning a review of its procurement and grant-award processes in 2019-2020. In the coming year, MOPAC will respond to the recommendations in this review and continue to work with GLA, Transport for London and MPS colleagues to explore potential options for the provision of longer-term support. MOPAC will also continue to support the work of the Group Collaboration Procurement Board, to explore further opportunities for working more closely with the GLA, Transport for London and MPS to manage demand in this area.

Further to the VCOP Review –the findings by the Victim's Commissioner will feed into victims commissioning.

Following a review by DARA, mechanisms to capture good practice and learning opportunities from the development of business cases will be considered and introduced.

*What could be improved?*

In 2020/21 MOPAC will respond to the recommendations of the review conducted of its procurement and grant award processes.

VRU

Over the next year, the VRU will do more in areas of programme development, partnership growth, data sharing, and evaluation. The VRU will work with the University of Surrey on how best to evaluate the impact of its work programme in its entirety. The VRU will also commission further behavioural insight research, following an important piece of work last year on a Strategic Needs Assessment.

- iii) Developing MOPAC's capacity, including the capability of its leadership and staff

*What is working well?*

MOPAC has continued to make significant progress in developing the capacity and capability of its leadership and staff through the People Strategy.

Over the year, outside of the specific Covid-19 response, MOPAC has updated HR policies and recruitment guidance, embedded a new performance and development framework, and continued a focus on staff wellbeing. Mandatory training has been embedded on unconscious bias, GDPR, health and safety, mental health awareness, safeguarding and counter-fraud. MOPAC is driving a more diverse and inclusive culture with support and training for managers to make practical improvements.

Covid-19 tested this approach bringing the importance of individual staff wellbeing and efficiency to the fore. The initial response focused on helping maintain staff morale and wellbeing and enabling staff to continue to work as efficiently as possible through providing equipment to enable them to work effectively and safely from home.

A Covid-19 specific pulse survey showed that 87% of staff felt they could work 'fairly' or 'very' effectively from home, 76% felt that MOPAC was committed to encouraging the wellbeing of staff, and 90% felt they knew how to access additional support if they needed it. During this period MOPAC also focused more resource on internal communications through regular emails, weekly all staff virtual calls and using Microsoft Teams to share information in one place. This has resulted in significant increases in scores, such as 82% of staff feeling that MOPAC does a good job of keeping them informed about matters that affect them, up 35% from 47% in the last survey.

### VRU

MOPAC has been central to the mobilisation and early staffing of the new VRU unit, while working to ensure their workplan is clear and differentiated from core MOPAC work. The team's culture directly supports attraction and retention of highly experienced and motivated staff. All staff in the VRU have development plans and recruitment for all roles in the unit has attracted extremely high application volumes. Within the 18 months since inception, the VRU has maintained a very high retention rate of staff, which has enabled the Unit to amass and distribute intelligence throughout MOPAC and City Hall.

### *How did we respond to last year's recommendations?*

Further to the CIPFA review of the capacity in the Strategic Finance and Resource Management (SFRM) team, temporary measures were put in place to test increased capacity and structural changes. MOPAC is now progressing to implement these on a permanent basis. This will significantly strengthen MOPAC's finance capability, including the ability to effectively oversee the MPS.

### *What could be improved?*

As MOPAC transitions from Covid-19 response to Covid-19 recovery, we will develop an Estates, IT and workforce plan (a subset of the wider People Strategy) to focus on supporting staff capacity and capability over the next 12 months.

MOPAC will continue to work to address the issues raised by the Black Lives Matter (BLM) movement, how that relates to the work of both the MPS and MOPAC and how it impacts the black community and black colleagues. We recognise that our progress so far is not enough, and with the support of an external D&I consultancy we will launch a refreshed D&I strategy with four aims:

- A workforce that is representative of London's diversity at all levels
- An inclusive culture where all staff can thrive and develop
- Embedding diversity and inclusion into the core of our decision-making

- Using our levers to help ensure services meet the needs of London's diverse communities

### VRU

The first year was focused on setting up the VRU and establishing its remit, programme of work, and defining staff roles and relationships. VRUs are established on the premise that a public health approach requires a long-term plan for reducing violence, especially in a city as complex as London. Decisions will have to be made about the future of the Unit, and what that means for funding and staffing.

- iv) Managing risks and performance through robust internal control and financial management

#### *What is working well?*

MOPAC has an effective system for scrutiny of MPS performance and financial management, and for internal financial control.

This year, MOPAC undertook a full refresh of its risk register. Our risk management processes and risk register are reviewed at a monthly Governance and Risk Working Group, attended by MOPAC and MPS staff. We align the risk registers of the two organisations and work to define more clearly our respective roles in managing those risks. We have reported quarterly to the Audit Panel on the alignment of our risks.

The risk register is under constant review and is being adapted in light of the Covid-19 pandemic. MOPAC has a mature and well-embedded decision-making process. The governance framework, including the Scheme of Delegation and Consent, decision making framework and supporting financial and contract regulations, define and document the roles and responsibilities of MOPAC and the MPS. All of MOPAC's major financial Decisions are discussed at DMPC/Directors meetings, published online and available for public scrutiny – and this has continued virtually throughout the Covid-19 pandemic.

MOPAC has continued to adapt well to GDPR requirements, taking external legal advice to ensure we remain compliant. We continue to work closely with the Information Commissioner's Office (ICO). GDPR training continues for all staff, with assurance by way of a checklist to ensure that each team understands the implications of GDPR and is compliant.

MOPAC's [quarterly performance report](#) brings together performance and finance reporting in a consistent format. This pack, along with the MPS quarterly report on performance against its business plan, forms the core agenda of the quarterly Oversight Board meetings chaired by the DMPC, and is issued to the Police and Crime Committee to support wider scrutiny by Assembly Members. The Oversight Board has also considered

deep dive sessions on information governance in the MPS, victim satisfaction, community engagement, use of force and bringing offenders to justice.

MOPAC has maintained effective internal budgetary controls, and offers training and guidance to non-finance staff, including those involved in commissioning and contracting.

MOPAC relies on a range of sources of assurance for our work in managing risk and ensuring the effectiveness of our internal controls. DARA plays a critical role as the internal auditor to MOPAC and is also the internal auditor to the MPS. MOPAC also works closely with the appointed external auditor, Grant Thornton, to absorb the recommendations made in their annual report on value for money.

*How did we respond to last year's recommendations?*

MOPAC continued to work closely with the MPS to align, where relevant, management of key strategic risks and assurance framework and MOPAC will keep the risk register under constant review in the light of the changing external environment.

A more strategic approach to business and portfolio planning is being incorporated into the planning and development phase of the next PCP which has been delayed due to the postponed Mayoral election. PCP planning meetings take place monthly and will expand to incorporate GLA colleagues at the end of 2020/21.

Work continues to increase understanding of the risk management approach at team level across MOPAC. Following review of the risk management approach it was decided not to introduce directorate level risk registers, however a more comprehensive corporate risk register has been developed alongside risk registers for key programmes such as the MOPAC Covid-19 response.

Work continues to improve understanding around directorate budgets and financial processes such as raising purchase orders. Staff are clearer on their responsibilities on goods receipting and keeping records around spend. Tighter controls have been implemented around staff expenses, with details of all MOPAC salary and expenses now published online.

*What could be improved?*

A more strategic approach to business and portfolio planning will be incorporated into the planning, development and delivery of the next PCP from the outset.

- v) Implementing good practices in transparency, reporting and audit to deliver effective accountability

*What is working well?*

Each month MOPAC produces a comprehensive monthly report to the Police and Crime Committee. The DMPC attended regular meetings of the PCC and the DMPC and CFO appeared as required by the Budget and Performance Committee.

In the year 2019/20, MOPAC answered 2,098 pieces of correspondence, 82% of which were answered on time, in line with agreed service levels. MOPAC answered 1,009 Mayor's Questions, of which 53% were submitted ahead of, or on time. MOPAC answered 57 Freedom of Information requests, 88% of which were responded to on time. Performance against FOI, MQs and correspondence is reviewed regularly by the MOPAC Senior Leadership Team and DMPC.

Mayoral and DMPC Decisions, Board agendas and minutes continue to be published on the website.

MOPAC held two of its regular public forums in 2019/20, *Justice Matters*, covering the London Victims' Commissioner's Rape Review and tackling Violence Against Women and Girls. A third planned Justice Matters meeting, looking at delivery of the Police and Crime Plan, was cancelled due to the Covid-19 outbreak.

MOPAC has strong complaint escalation procedure for staff matters and internal working practices. MOPAC has a gifts and hospitality policy which is included under our codes of conduct and was complied with.

To support and ensure scrutiny of the MPS, the law requires MOPAC to abide by certain regulations in matters relating to statutory functions carried out by MOPAC Professional Standards which are prescribed within Police Pensions Regulations 1987, Police (Conduct) (Amendment) Regulations 2015 and Police Appeals Tribunals (Amendment) Rules 2015. MOPAC have developed effective plans to anticipate the changes to be enacted under the Policing and Crime Act (PCA) including providing MOPAC with an increased role in the oversight of complaints about police and taking on responsibility for police appeals.

MOPAC continues to have a strong working relationship with the internal auditors, DARA, taking their formal advice and recommendations through their reports and informally through our [internal governance structures](#) and meetings. MOPAC reports on internal governance improvement actions on a quarterly basis to the DMPC and, separately, to the MPS-MOPAC Audit Panel.

An external quality assessment sponsored by the Chair of the joint MOPAC and MPS Audit Panel, concluded that DARA had achieved full compliance with the professional standards set out under PSIAS and is recognised throughout the policing sector – and indeed elsewhere in the public sector- as being one of the leading in-house public sector internal audit services.

MOPAC has a statutory duty to make arrangements for police custody detainees to be visited by independent persons to ensure their welfare, rights and entitlements are upheld

(s51 Police Reform Act, 2002 as amended). We do this through the Independent Custody Visiting Scheme, which recruits, trains and manages a pool of approximately 200 Independent Custody Visitors (ICVs). In line with the Code of Practice, the Scheme is led by a senior MOPAC officer and ICVs provide written reports to MOPAC.

At the start of the Covid-19 lockdown, as physical visits were suspended, MOPAC launched virtual independent custody visits, backed up by training and detailed information for volunteers across London's entire ICV scheme, with a weekly rota for calls with custody staff. ICVs and custody staff have responded well to the virtual visits and some custody suites have allowed ICVs to hold telephone consultations with detainees directly on these calls. ICV panel meetings have shown that volunteers have maintained the ability to robustly challenge custody staff on practices and policies. Over 60% of MOPAC's ICV scheme volunteers are vulnerable to Covid-19. These members have expressed the inclusive nature of the interim measures which have allowed them to shield or stay at home, whilst engaging with their volunteer work and by proxy their communities.

#### *How have we responded to last year's recommendations?*

MOPAC completed its review of ICV delivery arrangements and concluded that tendering the administrative services would enable MOPAC to focus on accountability and oversight of custody and improve recruitment and training programmes. An invitation to tender was launched but failed to achieve the necessary service, so it will be attempted again in the coming year.

To help refine the management of the ICV scheme MOPAC hosted a London-wide Custody Conference, bringing stakeholders together to discuss, confront and find shared solutions to ICVs' concerns. Plans are in place to review and update the ICV website to reflect changes to the scheme and provide more information to Londoners. MOPAC published the first ICV annual report in 2019/20, and the second ICV annual report covering 2019/20 will be published in the coming months.

MOPAC published its [contracts register](#) in early 2019 and has included additional information on the performance of core commissioned services in [quarterly reports](#) since February 2020, which will continue with future reports. In addition, MOPAC's website was refreshed with more information on our commissioned services.

MOPAC delivered a new framework for effective complaints oversight – given the new statutory responsibility to specifically have oversight of public complaints. This includes defining the governance arrangements to hold MPS to account effectively for their management of complaints. The law creating this new arrangement came into effect on 1 February 2020, and MOPAC has successfully recruited a new complaints team during 2019/20 to ensure its readiness to meet this new requirement.

The National Victims Strategy published a new duty for PCCs to take responsibility for compliance of the Victims Code of Practice in their area. MOPAC has [published an update](#),

responding to the London Victims' Commissioner's Review, setting out its own activities to ensure compliance.

MOPAC and MPS held a joint workshop in October 2019 to discuss interdependencies between the Investment Advisory and Monitoring group and the MPS Portfolio Investment Board/MPS Oversight Board and the Mayor's Corporate Investment Board. Subsequently, the Ways of Working documents was refreshed and shared with MPS in December 2019.

A project is in place to review the information on the Mayor's Land and Asset Portfolio website relating to MOPAC assets and ensure it is up-to-date and accurate while MPS security issues are addressed. Due to Covid-19 this is currently paused while there is no access to physical plans. A protocol has been agreed to ensure that changes to the asset list are updated on a quarterly basis.

#### *What could be improved?*

Building on the publication of the contracts register, MOPAC will work to publish a quarterly update and to provide a solution on the requirements on publication of all contracts. MOPAC will also work towards increasing published information on the performance of commissioned services.

MOPAC should continue to review ICV arrangements to ensure that volunteers are able to speak directly to detainees and with a view to safely resuming face-to-face visits as soon as possible.

- vi) Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

#### *What is working well?*

Fundamental to MOPAC's role in oversight of the Metropolitan Police is the duty to ensure that it acts in accordance with the law. This responsibility is fulfilled through the MOPAC governance framework and compliance is reviewed at the quarterly Audit Panel Meetings. The Deputy Mayor for Policing and Crime meets with the Chair of Audit Panel and has regular meetings with the Director of Audit, Risk and Assurance, the head of internal audit for MOPAC

Supporting this oversight is the work of the London Policing Ethics Panel. The Ethics Panel provides independent advice on complex issues facing policing, and the moral and ethical implications of them. This year, the Panel published an interim report on the use of facial recognition technology by police.

In accordance with paragraph 3.7.4.3 of the Code of Practice on Local Authority Accounting, it is noted that MOPAC's financial management arrangements conform with the governance requirements of the CIPFA *Statement on the Role of the Chief Financial*

*Officer in Local Government* (2010) as set out in the Application Note to *Delivering Good Governance in Local Government Framework*.

There is a comprehensive list of statutory requirements which is monitored. All MOPAC decisions consider the legal and risk implications amongst other implications and are published in compliance with the Elected Local Policing Bodies Orders 2011 and 2012 relating to transparency – satisfying the specified order.

MOPAC has an anti-fraud policy, and its Directorate of Audit, Risk and Assurance provides an effective counter-fraud service to MOPAC and the MPS.

MOPAC has a code of conduct for staff in which is outlined the high standards to which MOPAC staff should conduct themselves. Additionally, the MOPAC values (which were developed with staff and management) act as a key set of value-based behaviours which the organisation aspires to.

*How did we do against last year?*

Safeguarding best practice has been implemented across MOPAC and the VRU following a review, with new policy and procedure and face-to-face training for all those dealing with children or adults at risk. A safeguarding checklist has been provided, alongside training, for colleagues responsible for commissioned services.

MOPAC created and rolled out face-to-face counter-fraud training within teams.

*What could be improved?*

MOPAC will continue to roll out counter-fraud training to all MOPAC staff, and safeguarding training to all those dealing with children or adults at risk.

MOPAC will maintain and build on a strong emphasis on diversity and inclusion, through training and leadership.

vii) Ensuring openness and comprehensive Stakeholder Engagement

*What is working well?*

Throughout 2019/20 MOPAC continued to develop and improve communication practices and engagement with partners and stakeholders, to highlight outcomes and benefits of work undertaken – building on the good structures in place around delivery and tracking progress on the PCP. This work is expected to take greater shape over the coming months and will be even more pertinent as MOPAC navigates the ongoing challenges of Covid-19 where face-to-face meetings are less frequent.

*Victims' Commissioner and VCOP* - Independent Victims' Commissioner Claire Waxman's [Victims' Code of Practice review](#), which reported at the end of March 2019, found that, in most cases, compliance with the code by practitioners was low, with less than a third of victims having been told about the Victims' Code or offered a referral to support services at any point during their case. Following the publication of her Review, Claire has led work to engage with justice service partners and support services in the coming months to agree a plan of action to improve the victim experience in London.

*Wider Stakeholder Engagement* - Stakeholders include citizens, communities, voluntary and community sector organisations, public sector agencies and wider government. MOPAC has delivered this as core MOPAC, as part the VRU, and while spearheading the Mayor's new City Hall wide Countering Violent Extremism work.

*Evidence and Insight* - MOPAC continues to reach out to the public to ask their opinions and get their views through a variety of robust measures. In particular, our Evidence and Insight team oversee a variety of surveys to capture the voices of Londoners - be they members of the public or victims of crime.

This includes the Public Attitude Survey (a representative sample of 12,800 Londoners per year including questions around victimisation, fear of crime & crime concerns, attitudes to policing, contact with police) and the User Satisfaction Survey (capturing perceptions of 12,800 victims of crime about the service provided to them by the Metropolitan Police Service).

*Gangs Violence Matrix* - In December 2018, the Mayor published a comprehensive Review of the MPS Gangs Matrix, fulfilling his commitment to Londoners to do so, with the aim of restoring communities' trust and confidence in the way it is used by the police. The Review found that the Gangs Matrix can be an effective enforcement tool and is helping to tackle violence on our streets. However, for too many Londoners, the way it is has been applied and enforced was a cause for concern and it needed to be comprehensively overhauled to ensure it was used lawfully and proportionately. The Review made nine recommendations to address serious breaches of data protection laws and ensure only those at genuine risk of causing or being a victim of violence are included. In February 2020, the Mayor announced that as a result of these recommendations, the number of persons on the Matrix had reduced significantly and become more proportionate to the population of London.

*Safer Neighbourhood Boards* - S14 of the Police Reform and Social Responsibility Act 2011, requires MOPAC to make arrangements for obtaining the views of the community on policing and for obtaining the views of victims of crime in that area about matters concerning the policing of the area.

As well as the other methods already described, MOPAC discharges these functions with the borough-based Safer Neighbourhood Boards (SNBs). SNBs are an accountability and engagement mechanism established by the Mayor of London to ensure the police focus on the priorities of local communities. Their role is to contribute, along with borough partners, to the establishment of local policing and crime priorities, monitor police

performance and confidence, and to provide feedback to MOPAC about issues of local concern. MOPAC also provides SNBs with a small fund to support local projects to address issues that matter most to their community. MOPAC supports the SNBs through a pan-London forum, the provision of a bespoke data dashboard, and by providing development opportunities in key skills, such as chairing public meetings and understanding crime statistics.

*Community Monitoring Groups (CMGs)* - Code A of the Police and Criminal Evidence Act sets out specific duties for MOPAC in monitoring and supervising the use of stop and search powers. In London, there is a well-established Network of borough-based Stop and Search Community Monitoring Groups (CMGs). MOPAC supports the local groups by facilitating a pan-London network and provide training to CMG/Network members in examining and interpreting data and the broader community engagement potential for their groups.

#### VRU

Strong stakeholder engagement and partnership has continued throughout 2019/20. This included work with local authorities, the health sector, the MPS, the courts, central Government, and other statutory and community partners.

The core members within the wider Partnership Reference Group (PRG) meet bi-monthly and aligned to that is a Violence Reduction Board, that includes all the core membership. Between the two meetings of the core membership, there is regular oversight of the work of the VRU including the strategic needs assessment and workplan delivery.

Outside of the PRG the VRU has established a charities network to advise on VRU vision and values and there are regular structures in place for meetings with the health sector, the MPS, youth practitioners and local authorities.

#### *How did we do against last year?*

MOPAC held a series of events between September 2019 and January 2020 designed to increase awareness of engagement and oversight mechanisms, and to diversify the communities which usually engage with community-led policing initiatives. In 2019, MOPAC convened the first London Stop and Search Youth Reference Group, made up of under-25s from diverse backgrounds, to improve understanding of the challenges young people face engaging with scrutiny mechanisms and the police in general.

Ensuring that members of the public have confidence in the scrutiny structure that oversees stop and search is vital to communities in accepting that the use of the power is necessary. In January 2020, MOPAC commissioned a qualitative research project to understand the views of non-engaged young Londoners aged 11-24, parents/carers, and 16-23 year olds already engaged with police oversight functions.

MOPAC's webpages have been subject to a rolling review throughout 2019/20 to ensure they are up-to-date and user friendly – including being regularly refreshed with guidance during the Covid-19 lockdown.

Quarterly all staff away-days have been devoted to ensuring staff receive training on briefings and correspondence, underpinning a significant uplift in the quality of work in this area across the organisation to support our private office function.

#### *What could be improved?*

Covid-19, the disproportionality of its impacts and the Black Lives Matter movement have made clear the vital role of ongoing engagement with varied communities across London as we support the capital's recovery. MOPAC has prioritised this in the oversight of the MPS and will continue to prioritise this engagement as we all continue to work towards improving Londoners' trust and confidence in policing. The Mayor has committed to the production of an Action Plan in 2020/21 to improve trust and confidence, transparency and accountability in policing.

Work should continue to improve and fully embed communication practices to partners and stakeholders across the organisation and ensure they are regularly and fully briefed on the outcomes and benefits of MOPAC's work.

#### VRU

Two stakeholder groups that the VRU would like to deepen its engagement with are parents/carers and young people themselves. The VRU's commitment to this form of engagement will only intensify with a newly-recruited Young People's Action Group.

The Unit is also in the early stages of developing a digital platform through which its community of key local stakeholders can interact. It is the VRU's intention that this platform will become a hub for networking, collaboration and a repository for shared learning, including from the local action plans. The VRU will be keen to encourage other VRUs to be members of this hub and to share case studies as we develop them.

### **8. Reviewing the effectiveness of MOPAC's governance arrangements**

The reporting mechanisms between the respective MOPAC boards and management meetings through the Scheme of Delegation and Consent and respective terms of reference are clear and remain fit for purpose.

Our code of Governance was amended in 2018 to fully reflect the *CIPFA - Delivering Good Governance in Local Government*.

The Chief Executive and Directors have reviewed the effectiveness of the governance arrangements and their views have been reflected in the areas identified for improvement above.

## **9. Governance issues for improvement**

The Director of Audit, Risk and Assurance annual opinion for 2019/20 is 'MOPAC has an adequate internal control environment, which is generally operating effectively.' Areas for improvement identified by DARA to further strengthen the internal control environment are reflected in the Annual Governance Statement and improvement plan.

Throughout 2019/20, DARA completed audit reviews on:

- Business Planning and Performance Framework
- Strategic Oversight Framework
- Treasury Management (GLA review)

### Follow Up Reviews

- Evidence and Insight Strategic Framework
- General Data Protection Regulation (GDPR) Governance Framework
- Transparency and Reporting
- Strategic Oversight Framework
- Commissioning Framework

### Advisory Work

- Planning for the Police and Crime Plan 2020-2024
- Risk Management – Identifying and Managing Risk Interdependencies
- Commissioning
- Information and Communications Technology
- Annual Certifications for Child House Grants for 2017/18 and 2018/19

Recommendations from these are routinely incorporated into the AGS. Action on the improvement areas set out by DARA above will further enhance MOPAC's governance arrangements and together with on-going actions from the Governance Improvement Plan will be monitored by the Audit Panel on a quarterly basis.

### Governance Improvement Plan 2020/21

The areas outlined in Section 4 of this document as needing improvement will be added to the MOPAC Governance Improvement Plan 2020/21.

The Governance Improvement Plan outlines all improvement areas and steps necessary to further enhance our governance arrangements and ensure that MOPAC's governance continues to improve.

It identifies and tracks more detailed actions against outstanding improvements. The Governance Improvement Plan itself is actively managed by the MOPAC Governance and Risk Working Group which meets on a monthly basis and is chaired by the Director of Strategy.

For reference, the key improvement areas have been highlighted in the table below.

| <b>Principle</b>   | <b>MOPAC</b>  |
|--|---|
| i) Defining outcomes in terms of sustainable economic, social and environmental benefits | <p>MOPAC will respond to and implement the recommendations of the LCRB sub-board governance review, which is examining whether the current structure remains fit for purpose in order to maximise future delivery against partnership PCP commitments, wider MOPAC priorities, and future PCP development.</p> <p>The Covid-19 pandemic has had a significant impact on many of the key indicators for Crime and Policing in London. The initial lockdown had a significant impact on certain crime types and it is likely that there will be longer-term impacts on survey measures (for example trust and confidence) as well as further changes as lockdown measures are eased. This presents a challenge to our usual points of reference in defining outcomes of MOPAC's work. Year-on-year comparisons will become impossible, or irrelevant.</p> <p>MOPAC's E&amp;I team must work to provide an alternative, refreshed, evidence base to reflect the post-Covid world.</p> <p>VRU - For the VRU, Covid-19 is having a profound effect on partners' – and youth/parenting services' – ability to deliver interventions and services that support young people and their families. One of the main priorities for the VRU as London emerges from lockdown and into what is likely to be a long recovery period, is to develop a strategy for supporting vulnerable young people who might now be more likely to become involved in violence and/or be exploited post-lockdown. We have assembled a group of external stakeholders to assist with this new area of work.</p> |
| ii) Determining the interventions necessary to achieve the intended outcomes             | <p>In 2020/21 MOPAC will respond to the recommendations of the review conducted of its procurement and grant award processes.</p> <p>MOPAC will work with MPS to incorporate guidance on mechanisms to capture good practice into MPS guidance.</p> <p>VRU - Over the next year, the VRU will do more in areas of programme development, partnership growth, data sharing, and evaluation. The VRU will work with the University of Surrey on how best to evaluate the impact of its work programme in its</p>  |

|   |  |
|---|--|
|   | <p>entirety. The VRU will also commission the Behavioural Insights Team to conduct further research, following an important piece of work last year on a Strategic Needs Assessment.</p>   |
| iii) Developing MOPAC's capacity, including the capability of its leadership and staff                  | <p>As MOPAC transitions from Covid-19 response to Covid-19 recovery, we will develop an Estates, IT and workforce plan (a subset of the wider People Strategy) to focus on supporting staff capacity and capability over the next 12 months.</p> <p>MOPAC will continue to work to address the issues raised by the Black Lives Matter (BLM) movement, how that relates to the work of both the MPS and MOPAC and how it impacts the black community and black colleagues. We recognise that our progress so far is not enough, and with the support of an external D&amp;I consultancy we will launch a refreshed D&amp;I strategy with four aims:</p> <ul style="list-style-type: none"> <li>A workforce that is representative of London's diversity at all levels</li> <li>An inclusive culture where all staff can thrive and develop</li> <li>Embedding diversity and inclusion into the core of our decision-making</li> <li>Using our levers to help ensure services meet the needs of London's diverse communities</li> </ul> <p>VRU - The first year was focused on setting up the VRU and establishing its remit, programme of work, and defining staff roles and relationships. VRUs are established on the premise that a public health approach requires a long-term plan for reducing violence, especially in a city as complex as London. Decisions will have to be made about the future of the Unit, and what that means for funding and staffing.</p> |
| iv) Managing risks and performance through robust internal control and financial management             | <p>A more strategic approach to business and portfolio planning will be incorporated into the planning, development and delivery of the next PCP from the outset.</p>  |
| v) Implementing good practices in transparency, reporting and audit to deliver effective accountability | <p>Building on the publication of the contracts register, MOPAC will work to publish a quarterly update and to provide a solution on the requirements on publication of all contracts. MOPAC will also work towards increasing published information on the performance of commissioned services.</p> <p>MOPAC should continue to review ICV arrangements to ensure that volunteers are able to speak directly to detainees and with a view to safely resuming face-to-face visits as soon as possible.</p> <p>MOPAC will continue to roll out counter-fraud training to all MOPAC staff, and safeguarding training to all those dealing with children or adults at risk.</p>  |

|  |  |
|--|--|
| vi) Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law | <p>MOPAC will maintain and build on a strong emphasis on diversity and inclusion, through training and leadership.</p> <p>Covid-19, the disproportionality of its impacts and the Black Lives Matter movement have made clear the vital role of ongoing engagement with varied communities across London as we support the capital's recovery. MOPAC has prioritised this in the oversight of the MPS and will continue to prioritise this engagement as we all continue to work towards improving Londoners' trust and confidence in policing. The Mayor has committed to the production of an Action Plan in 2020/21 to address these issues of police scrutiny.</p>   |
| vii) Ensuring openness and comprehensive Stakeholder Engagement  | <p>Work should continue to improve and fully embed communication practices to partners and stakeholders across the organisation and ensure they are regularly and fully briefed on the outcomes and benefits of MOPAC's work.</p> <p>VRU - Two stakeholder groups that the VRU would like to deepen its engagement with are parents/carers, and young people themselves. The VRU's commitment to this form of engagement will only intensify with a newly-recruited Young People's Action Group.</p> <p>The Unit is also in the early stages of developing a digital platform through which its community of key local stakeholders can interact. It is the VRU's intention that this platform will become a hub for networking, collaboration and a repository for shared learning, including from the local action plans. The VRU will be keen to encourage other VRUs to be members of this hub and to share case studies as we develop them.</p> |

## 10. Identification of further governance improvement initiatives in 2020/21

It is proposed that over the coming year, Internal Audit will review the following areas, which are aligned to MOPAC strategic objectives and risks, and MOPAC will take steps as appropriate to address any governance and control issues that arise:

### **Oversight – Statutory duty to oversee policing in London**

Oversight Framework – Operational and Transformation (Advisory)

Oversight of Police Complaints (this will cover review of MPS)

### **Follow Up Reviews:**

Risk Management – Identifying and Managing Risk Interdependencies

### **Convening – Bringing together key partners to deliver the Police and Crime Plan**

Community Engagement

**Follow Up Reviews:**

Community Engagement

**Deliver – Commissioning services and carrying out significant stakeholder consultation and engagement on policing and criminal justice matters**

Commissioning – Strategic Framework (GLA and MOPAC inc. VRU)

Violent Crime – linked to MPS audit

**Follow Up Reviews:**

Commissioning – co-commissioning (including the MPS)

**Communicate – Public accountability and external communication**

MOPAC Internal Governance (e.g. Monitoring of MQs, briefings)

MOPAC's response and recovery work in relation to COVID19 is reflected in the draft plan above as part of the scoping of all reviews undertaken.

**11. Statement of Assurance**

MOPAC's governance arrangements are designed to ensure that we take an appropriate and proportionate approach to managing risk. The arrangements are not designed to eliminate all risks but rather provide a reasonable degree of assurance of our effectiveness in managing the risks.

We are satisfied that the steps set out above have addressed the need for improvements that were identified in the review of effectiveness. We will continue to monitor their implementation and operation during the year and as part of our next annual review.

3 July 2020

3 July 2020

Signed

Sophie Linden  
Deputy Mayor for Policing and Crime

Signed

Diana Luchford  
Chief Executive

## **MOPAC's internal governance structures**

MOPAC's [internal governance arrangement](#) was reviewed following the launch of the PCP in 2017 to ensure effective monitoring.

MOPAC is held to account over its objectives, operations and delivery of the PCP through various Boards and Panels, which are detailed below.

### **Governance over the MPS and key partners**

#### **i. Oversight Board**

The quarterly MOPAC-MPS Oversight Board enables the DMPC to effectively exercise the role and duties of the Police and Crime Commissioner for the Metropolis, as delegated by the Mayor of London. The functions of the Oversight Board are to

- Scrutinise MPS delivery against the Police and Crime Plan on behalf of the Mayor, and performance against agreed priorities
- Have oversight of value for money through economy, efficiency and effectiveness
- Undertake, at the request of the DMPC, assurance on key priorities and specific issues of concern to the public and PCP
- Approve and review the Mid-Term Financial Strategy (MTFS) in line with Mayoral priorities and
- Monitor progress, delivery and risks against the MPS Business Plan.

#### **ii. The London Crime Reduction Board (LCRB)**

At [LCRB](#), the Mayor, DMPC, the Commissioner, representations from across the Criminal Justice Service and London boroughs come together to agree a coordinated approach to crime reduction and community safety in London. High-level intelligence on crime and public concerns about safety is also reviewed. This board is key to utilising the Mayor's convening powers to work with a number of partners to deliver policing and crime priorities within the Police and Crime Plan for London.

#### **iii. Bi-laterals**

The Mayor routinely meets with the Commissioner and her team, including specialist operations, to discuss policing in London and to be briefed on counter terrorism.

The DMPC and the Commissioner hold regular meetings to provide in depth scrutiny of the effectiveness and efficiency of the MPS and to consider issues of importance to policing and crime reduction in London.

#### **iv. Informal One-to-Ones**

On an informal basis, the DMPC meets regularly with MPS Assistant Commissioners, as well as occasionally with key Deputy Assistant Commissioners, Commanders and other members of the MPS Management Board.

**v. Justice Matters**

Justice Matters is a mechanism whereby the Deputy Mayor brings London partners together in a transparent manner, to problem solve issues for London and bring accountability for those solutions by partners. The meetings are webcast and held in public on a quarterly basis.

Experts in the field are invited to explore different themes from across the spectrum. Areas that have been investigated include Tackling Sexual Violence and Offender Management in London.

**vi. Investment Advisory (IAB)**

IAB is an advisory board to the DMPC, to inform decisions subsequently taken and published. It ensures that MPS investment decisions deliver the police and crime plan and are founded on a sound business case, contributing to efficiency and effectiveness of the MPS. The business case proposals supporting key investments in the MPS transformational change programme are considered at this board.

**vii. Corporate Investment Board (CIB)**

In addition to the MOPAC governance, as part of the wider GLA corporate governance and to ensure consistency across the GLA, proposed MOPAC investment decisions are reported to the GLA Corporate Investment Board (CIB). The Deputy Mayor for Policing and Crime is a member of this board. The board is an internal forum chaired by the Mayor's Chief of Staff. Further information on and the public minutes of CIB meetings can be accessed here: <https://www.london.gov.uk/about-us/governance-and-spending/good-governance/decision-making>.

**viii. Child Protection Policing Oversight Group**

MOPAC established this group to support and oversee the MPS in their response to the HMIC inspection report on child protection. MOPAC and the Directorate of Audit and Assurance (DARA) have carried out extensive work with the MPS to oversee development of a wide-ranging action plan. As a key part of this detailed plan, the DMPC has established an improvement scrutiny group, which met for the first time on the 7 December 2016. In addition, MOPAC takes a risk-based approach to Governance, introducing bespoke oversight mechanisms in response to issues representing a high-level risk. In response to weaknesses identified by MPS, audit and HMIC the remit of this group is to ensure that the MPS respond appropriately and effectively to each of the recommendations set out by Her Majesty's Inspectorate of Constabulary (HMIC).

**External**

The Police Reform and Social Responsibility Act 2011 requires the establishment of an ordinary Committee of the Assembly to be the Police and Crime Panel. This function is and will continue to be carried out by the Police and Crime Committee (PCC). MOPAC is scrutinised via the following avenues:

#### **I. Police and Crime Committee**

The London Assembly's Police and Crime Committee (PCC) is the statutory body that examines the work of MOPAC and meets twenty times a year. Ten of those meetings are used principally to hold question and answer sessions with the DMPC and Commissioner or their representative. The Committee can require the DMPC and / or staff from MOPAC to attend its meetings for the purpose of giving evidence and provide documents to it. The Committee also investigates key issues relating to policing and crime in London as part of this scrutiny.

#### **II. Mayor's Questions**

The Mayor's Question Time (MQT) meetings take place ten times a year. Assembly Members as part of their role in holding the Mayor and his functional bodies to account ask the Mayor a range of questions within the remit of his role, which includes policing. Questions which are not answered at the meeting receive written responses. A number of policing questions are asked of the Mayor during MQT.

#### **III. Functional Body Question Time**

At least once a year, Functional Body Question Time (FBQT) or Plenary sessions on Policing issues are held with the Mayor and the Commissioner. This forms another opportunity for Assembly Members to hold both the Mayor and the Commissioner to account and examine policing matters in London.

#### **IV. Budget and Performance Committee**

The London Assembly's Budget and Performance Committee scrutinises the Mayor's budget for the financial year and the implications for services and council taxes in London. It also examines, monitors and reports on the budgets and performance of the GLA and Functional Bodies which includes MOPAC

The Budget Monitoring Sub-Committee is a Sub-Committee of the Budget and Performance Committee, which considers reports on its behalf. This mainly involves scrutinising the quarterly monitoring reports provided by the GLA and its functional bodies including MOPAC.

#### **V. Oversight Committee**

The Greater London Authority (GLA) Oversight Committee is responsible for a range of matters and sometimes examines the work of MOPAC as it pertains to their terms of reference.

## **The London Victims' Commissioner**

In 2017, Claire Waxman became London's first independent Victims' Commissioner. Her role is to stand up for victims and survivors of crime across the capital and ensure their needs are at the heart of our policing and criminal justice services. Claire reports directly to the DMPC and plays a significant role in stakeholder engagement and overseeing the delivery and performance of MOPAC's Victims' commissioning service. Claire's ambitious programme of work includes:

- **A wide-ranging consultation with survivors of violence against women and girls, to inform the Mayor's VAWG Strategy.** This included further analysis of the barriers to safe reporting for victims with insecure immigration status which informed a stringent set of recommendations sent to the Home Secretary from the Mayor to increase support and protection.
- **A full victims' needs assessment via an in-depth survey to gather the views and feedback of victims of crime in London** to inform future service provision and ensure all victims can access the support they need. Findings and recommendations were published in March 2019 and work is ongoing to monitor progress from CJS partners on the key recommendations.
- **An extensive review into rape cases and justice outcomes in London**, to identify why cases take so long to get to court, why so many victims disengage from the process before the case can be concluded; and a thorough investigation into disclosure practices. Findings and recommendations were published in July 2019 and work is ongoing to monitor progress from CJS partners on key recommendations.
- **Further research on the key issue of disclosure of personal data and digital devices in rape cases (identified in the Rape Review)**, tracking when requests are made to victims, whether they are reasonable and the relationship to case and justice outcomes. Research is ongoing and findings are expected towards the end of 2020.
- **Establishing a Victims' Board comprising of justice agencies** which supports the delivery of the commitments set out in the Police and Crime Plan and provides the opportunity for the victims' voice to be at the centre of decision making.
- **Forming a Victims' Reference Group for ongoing engagement with stakeholders including victims of crime to inform her work and the work of the Victims Board**, so accessible, high quality, integrated and tailored services are available to enable those affected by crime in London to fully cope and recover. If you are an organisation who wishes to be considered to join please [email us](#).
- **Commissioning a new online resource for victims** to act as a virtual 'one front door' to ensure that victims' can easily access comprehensive information, advice and the pathways available to them when they need it.
- **Convening London's first ever Victims' Summits, bringing together senior leaders from all justice agencies, voluntary and community groups, local councils and victims of crime**, to galvanise a partnership effort to improve victims' experiences of navigating the justice system and support options post-incident.

- **Working closely with the Metropolitan Police Service to address recent findings of the decline in victim satisfaction rates**, delivering on a suite of recommendations including 14,000 frontline officers receiving specialist victims care training and improving police correspondence & communication to victims.
- **Working closely with the Ministry of Justice to help shape their Victims' Strategy** and working with partners to ensure the Government deliver their recommendations and fulfil their commitment in delivering a Victims' Law.

## APPENDIX 3

### **Violence Reduction Unit (VRU)**

In response to increasing violence in London, the Mayor announced the formation of the VRU in September 2018. The VRU Director, Lib Peck, was appointed in January 2019 and the unit became fully operational in early 2019/20.

The VRU is taking a fundamentally different, public health approach to violence reduction – one where the institutions and communities that make up London act together to help identify and address the underlying causes of violence. The Mayor chairs a Partnership Reference Group, to ensure that partner views are at the heart of the VRU's work. The Group met for the first time in October 2018 and met for a total of four times in 2018-19.

The VRU is a City Hall partnership with input from the Deputy Mayor for Policing and Crime, the Deputy Mayor for Social Integration, Social Mobility and Community Engagement (DMSI); and the Deputy Mayor for Education and Childcare (DMEC). MOPAC remains legally accountable for the decisions and operations of the VRU insofar as they relate to its' responsibilities. Where decisions relate to MOPAC's responsibilities, the VRU is subject to MOPAC's scheme of delegation and consent. The VRU's permanent staff are employed on MOPAC terms and conditions.

## APPENDIX 4

### **Independent Panels**

#### i) Audit Panel

In line with the Home Office Financial Management Code of Practice established to support the implementation of the Police Reform and Social Responsibility Act 2011, a joint MOPAC/MPS Audit Panel, performing the functionality of an Audit Committee, was established.

The Audit Panel is responsible for enhancing public trust and confidence in MOPAC and the MPS. It also assists MOPAC in discharging its statutory responsibility to hold the MPS to account. It advises MOPAC and the MPS Commissioner according to good governance principles and

provides independent assurance on the adequacy and effectiveness of MOPAC and the MPS internal control environments and risk management frameworks.

The Audit Panel held its first meeting on 31 March 2017. It receives regular reports at its quarterly meeting, including MOPAC governance and risk matters and the respective improvement plans.

MOPAC has responsibility for conducting regular reviews of the effectiveness of the governance framework, including the system of internal audit and the system of internal control. The review is continuous with a programme of reviews of governance policies to ensure they meet the demands and needs of MOPAC. DARA provides assurance on the effectiveness of the MOPAC governance framework and highlight areas for improvement which are reported to senior management. Internal reviews tend to include research into best practice, update of the framework and provision or update of policies and procedures. Changes are subject of a decision and will be published. The effectiveness of the framework is also reviewed in drawing up the Annual Governance Statement.

ii)      Ethics Panel

The London Policing Ethics Panel (LPEP) is an advisory panel that is independent of the mayoralty, defines its own work plan and publishes its own findings, that are then sent to the Mayor, Deputy Mayor for Policing and Crime and Commissioner of the MPS.

In March 2018, the new membership of LPEP was announced. Dr Suzanne Shale was announced as the new chair. In 2019/20, the Panel examined the use by the Metropolitan Police of facial recognition technology, and how the MPS prioritises in the face of Government cuts to its budgets.