

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

# MPS-MOPAC JOINT AUDIT PANEL

## 17 January 2022

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### Met Risk Management Report

Report by: Chief of Corporate Services

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#### **Report Summary**

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

This report provides an overview of the Met's corporate risks and the status of their controls.

In terms of progress against our corporate risks, seven are assessed by the respective risk owners and working leads to be 'green' and two risks are assessed to be 'amber' and one risk assessed to be 'red'.

A response to an action raised at the last Audit Panel related to whistleblowing is provided.

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

Risk and Assurance Board met on 30 November where they noted the progress made against the risks over the last quarter. For those risks reporting limited progress, risk owners provided a response to Risk and Assurance Board as to the reasons why.

Board members discussed the Legitimacy risk as a substantial agenda item and they considered the significant controls and activity occurring across the Met to increase trust and confidence; these are detailed within the report and appendix B.

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

- The Met's governance improvement plans reported in a separate paper to this meeting include controls for some of our risks.

##### **Recommendations**

The Audit Panel is recommended to:

- Note the Met's key risks and the governance that is in place to ensure effective management of them.

### Corporate risk update

- 1.1. A summary of the Met's refreshed corporate risk register, which sets out the significant short and long term risks, is attached at **Appendix A**.
- 1.2. We have provided the Panel with information on four of the risks including risk appetite and the key controls in progress to improve the position of the risk. It sets out the status of those controls and provides an overall assessment on the progress being made towards achieving the 'target score' with four possible options: On Track; Limited; Slipped and No progress. Detailed templates for all risks can be provided if required.

### Risk position update

#### 'On track' risks to note are:

- 1.3. **Money (risk 6 – long-term):** This risk has reduced in score from High likelihood to Low likelihood following the outcome of the spending review, which was more favourable than it could have been. To support the spending review, we delivered an efficiency narrative, which included not only traditional efficiency measures such as savings and financial considerations, but also measures to improve our operational efficiency, for instance the use of tech tools such as Axon Citizen, and Box, through to developments in intelligence. Other considerations for the improvements to this risk include progression of the enhanced business planning process with Business Groups; this is underway and will be reported to Management Board at frequent intervals as we approach the beginning of the next financial year.

#### 'Limited' risks to note are:

- 1.4. **People (risk 4 – long-term):** This is the second quarter that limited progress is reported and the reason remains tied to the numbers in the recruitment pipeline for officers, which if sustained risks delivery of the 2022/23 workforce plan. The buoyant labour market is suspected to be a key contributor and there is some insight that recent events on standards & culture have had a negative impact. Additional attraction campaigns are scheduled, and pipeline insight is being monitored closely concerning attraction and attrition. In Q2 21/22 we delivered 819 new recruits. FY to date this is 23.4% of new officers were Black, Asian and Multiple Ethnic Heritage, 4.1% Black & 39.8% female. As predicted this sees a slightly reduced Black, Asian and Multiple Ethnic Heritage and Black candidate percentage but is an increase in female intakes
- 1.5. **Crime Prevention (risk 8 – long-term):** Whilst this is a long-term risk, as directed by Risk and Assurance Board members at the refresh in June, short term actions were required to ensure a continuous drive for improvement. Nine key controls were identified, with implementation dates out to March 2022 (Target date). Whilst six controls are on track and are delivering improvements, progress against three controls is limited this quarter.

- 1.6. Positive Activity Initiatives (PAI) are a “3 or 6 week positive volunteer and partner activity in micro areas of lower confidence and higher violence” – these have an associated performance objective of at least 12 per year per BCU. Although a number of PIAs are complete and others in motion, there is still some way to go to reach the aspiration of 12 PAIs per BCU. It has been established that not all steps are being followed therefore PAI training, recording and governance has now commenced to inform future accuracy. By 10 January 2022, each Neighbourhood Supt is required to develop a forward plan to forecast the number of PAIs to be delivered by March 2022.

**‘Slipped’ risks to note are:**

- 1.7. **Public and Local Engagement (risk 9 – long-term):** As with risk 8, this is also long-term risk, directed by Risk and Assurance Board members to have short term actions to drive for improvement. There are 5 key controls and this quarter, and whilst development of the StrIDE strategy to 2025 is a significant achievement, 3 controls are reporting limited progress and 1 has marginally slipped. The slipped action relates to Tier 1 activity (ensuring representation) and the establishment of various forums which is reducing engagement and involvement with some under-represented communities; however, at the time of writing this is expected to be resolved by end December.

**Further work on standards**

- 1.8. **Standards (risk 3 – short-term):** While the actions on this risk as agreed previously were on track, it was agreed that DAC Professionalism and the Director of Strategy would work together to fundamentally recast this risk and reflect the new and much bigger risk. This has now been done and reflects important work on the Rebuilding Trust plan, the Casey review into Met standards and culture, and important strands including the cascade of expected behaviours, which is being supplemented by follow up communication and engagement. The current assessment of this work is ‘amber’ but this will be kept under close review at Risk and Assurance board. Significant work continues to be driven at pace. Performance Board will monitor delivery of actions and priorities from the Rebuilding Trust plan and a number of priorities are nearing completion in line with their published dates.

**Legitimacy (risk 10 – long-term)**

- 1.9. This risk was a substantial agenda item at Risk and Assurance Board on 30 November.
- 1.10. Since the last Audit Panel on 4 October, there has been considerable activity relating to controls to this risk. Equally, there have been a considerable number of challenges to our legitimacy, including but not limited to:
- a) the sentencing of the murderer of Sarah Everard in late September;
  - b) other cases which have seriously called into question the standards and conduct of our officers;
  - c) some debate around our approach to protest,
  - d) the inquest in to the deaths of four men killed by Stephen Port.

**Controls this quarter**

- 1.11. There has been very significant activity to consolidate and grow our legitimacy in the past quarter. This includes:

STRIDE

- 1.12. Our [STRIDE strategy and action plan](#) were published in late September. These are the product of considerable engagement and work across the Met and with our partners.
- 1.13. The strategy sets out how as an organisation we will ensure that everyone who lives, works and visits London feels and stays safe. It also outlines how our people can flourish to their full potential and how as an ethical and fair organisation we will attract Londoners in all their diversity to work for us.

REBUILDING TRUST

- 1.14. Our [Rebuilding Trust plan](#) was published in October 2021 and outlines the Met's immediate priorities to raise standards and improve our culture. The plan is focused on how we best restore the trust of the public in the Met and our people, with a focus on three primary objectives: Raising standards; Improving our culture and Doing our job well.

- 1.15. In the plan we have committed to 12 immediate priorities, including:
- a) Completing an urgent review of all current investigations into allegations of sexual misconduct and domestic abuse against our officers and staff
  - b) Boosting the number of investigators in our professional standards department to strengthen our capability and prevent people abusing their positions of trust
  - c) A root and branch review of the Parliamentary and Diplomatic Protection Command

- 1.16. In addition, we have nominated a dedicated Chief officer lead to this work (Commander Rachel Williams) and a Management Board Rebuilding Trust which has undertaken significant work in this past two months.

- 1.17. There has been a cascade on three key expectations on standards (appropriate boundaries, use of social media and actively intervening) across the Met.

- 1.18. We have also announced an independent and external review to be led by Baroness Casey of Blackstock in to our culture and standards. This will begin early in January 2022 (more on this below).

VIOLENCE AGAINST WOMEN AND GIRLS

- 1.19. In early November we published our [Violence Against Women and Girls Action Plan](#) - this plan brings together much of the work across the Met and sets out what more we will be doing. We are currently engaging further on the plan with a view to a final plan by Spring 2022.

- 1.20. The plan brings together our key priorities under four main headings: Protecting women and girls in public spaces, at home and online; Working with our partners and with women to improve prevention and victim care; Bringing offenders to justice and improving criminal justice outcomes for victims; and Improving Met culture and professional standards.
- 1.21. In this quarter, a number of operational strands, including Autumn Nights, Operation Vigilant and Ask for Angela, have been publicised to build confidence.

DEPUTY COMMISSIONER'S DELIVERY GROUP

- 1.22. The Deputy Commissioner's Delivery Group was set up in Autumn 2020 to both support black officers within the organisation and improve relations between the Met and London's black communities. The team leads work across four key strands of work, which will help deliver the Met's STRIDE priorities. This work includes improving the sense of inclusion, support and opportunity for black officers and staff; identifying and challenging any barriers within recruitment and promotion processes; further improving trust and confidence for policing encounters, including those involving the use of force; and engaging with key community members and stakeholders on these crucial issues.
- 1.23. Progress this quarter has continued at pace across the 23 actions for the Met in the Mayor's Action plan, including the recent publication of our handcuffing policy.

DETECTIONS

- 1.24. AC Nick Ephgrave has in this quarter, been leading a pan-Met effort to considerably increase our detection rates, particularly around key crime types. This will continue to be a major priority for at least the next two years and we have an agreed assessment of the challenge and also action to be taken.

DELIVERY

- 1.25. Tying all this together, we have remained focused on the delivery of Met Direction and the Performance Framework with our key metrics. These have been reviewed by our Management Board and we have an agreed way forward to develop the annual refresh of the Performance Framework for April 2022.

ENGAGEMENT AND COMMUNICATION

- 1.26. Across the Met, there has been a concerted effort to maximise our engagement and communication with the communities we serve and with key stakeholders. This will continue in to the next quarter.
- 1.27. **Appendix B** details how the key strategic action plans we currently have in place aim to improve trust in this multi-pronged approach, and how together they reach across all Met Direction pillars.

- 1.28. We are also working with MOPAC to deliver greater granularity through the Public Attitudes Survey and other channels to deliver richer insight for our actions.
- 1.29. All this work will continue to be monitored through Management Board and against our delivery plans.

## **2. Whistleblowing Reports**

- 2.1. At the last Audit Panel, members asked for information related to whistleblowing, specifically if the Met had considered using a third party to retrieve whistleblowing reports.
- 2.2. There are a number of ways in which concerns can be raised, depending on the individual circumstances, but reporting openly is always encouraged as this allows support to be put in place. This could include through line management, local professional standards units or to the Directorate of Professional Standards (DPS) directly.
- 2.3. The Met also has four different ways for officers and staff to report concerns, which are completely anonymous.
- 2.4. Two of these are managed by the Met:
  - i. Right Line Telephone line;
  - ii. Right Line Online
- 2.5. Two are managed externally by Crimestoppers:
  - iii. Integrity Line;
  - iv. Integrity Line Online

### Whistleblowing under the Public Interest Disclosure Act 1998

- 2.6. Colloquially whistleblowing is used to refer to anybody that reports wrongdoing but whistleblowing and qualifying disclosures are defined under the Public Interest Disclosure Act 1998 (PIDA). Most people who raise concerns within the Met are not whistle-blowers as defined by the legislation and Met policy, but they are afforded the same protection from discrimination or unfair treatment.
- 2.7. There are various ways that a potential protected disclosure under PIDA is identified such as; an individual identifying themselves, a referral from a DPS investigator or colleague, through one of the anonymous reporting methods or through daily scanning of DPS intelligence.
- 2.8. During the recent HMICFRS inspection we were told that the Met is the only force in the country with a dedicated whistleblowing team. In the uplift there were also be an addition officer joining the team.
- 2.9. In conclusion, we do have a third party reporting mechanism through Crimestoppers. We have recently been inspected by HMICFRS and are awaiting the report. Dr Shale, chair of the London Policing Ethics Panel is also

currently conducting a desktop review of our arrangements and we look forward to any observations and recommendations arising from both.

- 2.10. We believe our specific whistleblowing arrangements and specialist team offer the best solution to managing protected disclosures under PIDA and that for raising concerns more generally we have multiple reporting routes, four of which are anonymous, which provide sufficient opportunity for reporting.

**3. Equality and Diversity Impact**

Individual control owners should ensure that their work to prevent and mitigate corporate risk has a positive race and diversity impact. Equality impact assessments will be undertaken on significant programmes of work.

**4. Financial Implications**

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

**5. Legal Implications**

There are no direct legal implications arising from the recommendations contained in this report. Regulation 3 of the Accounts & Audit Regulations 2015 requires both the MOPAC and the Commissioner, as relevant authorities, to ensure that they have a sound system of internal control, which includes effective arrangements for the management of risk.

**6. Risk Implications**

The corporate risk report assists the Met to manage and track risk to the achievement of organisational objectives focusing particularly on whether controls are fit for purpose and manage risk areas as intended.

**7. Contact Details**

Report author: Tracy Rylance, Strategy & Governance  
Email: [tracy.rylance@met.pnn.police.uk](mailto:tracy.rylance@met.pnn.police.uk)

**8. Appendices and Background Papers**

**Appendix A** – Summary of corporate risks and heat maps – December 2021

**Appendix B** – Trust initiatives – See agenda item 3.

SHORT-TERM

Ref	Risk Trend	Risk Description	Risk Owner	Working Lead(s)	Target position
1 M v H	↓	<b>VIOLENT CRIME</b> Our operational efforts and the work to mobilise partners do not translate into decreases in violent crime leading to more victims and impacting on confidence in the Met to keep London safe	AC Frontline Policing	Head of Profession – CP, Inclusion & Engagement Cmdr Frontline Policing	L v M
2 H v M	↔	<b>NEW SYSTEMS</b> Failure to successfully deliver large scale Met and national technology programmes (i.e. CONNECT, Command & Control, LMS, LRM, ESM & ANPR) significantly undermining operational delivery	Deputy Commissioner	Chief Digital and Technology Officer	M v M
3 H v H	↔	<b>STANDARDS</b> Failure to communicate and uphold clear standards for our workforce undermines public confidence in the Met	AC Professionalism	DAC Professionalism	L v L

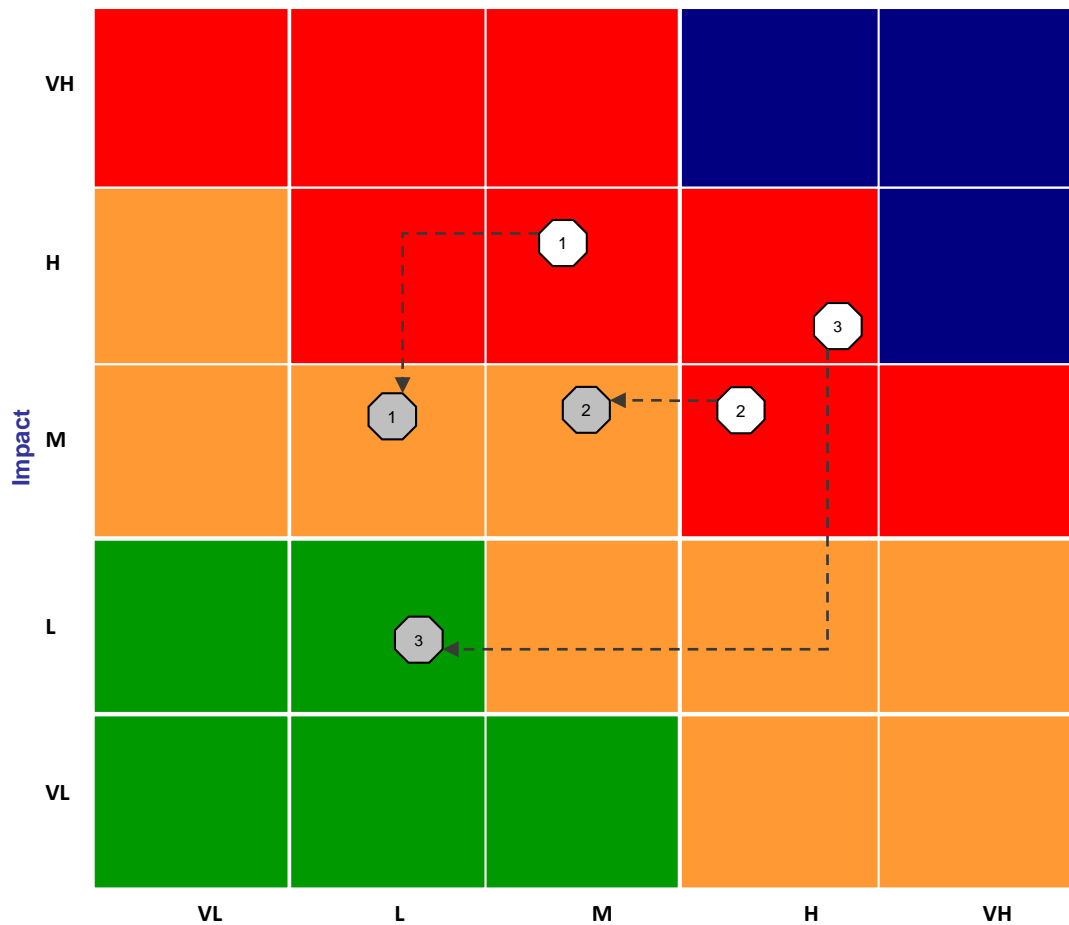


# Appendix A - Corporate risk register December 2021

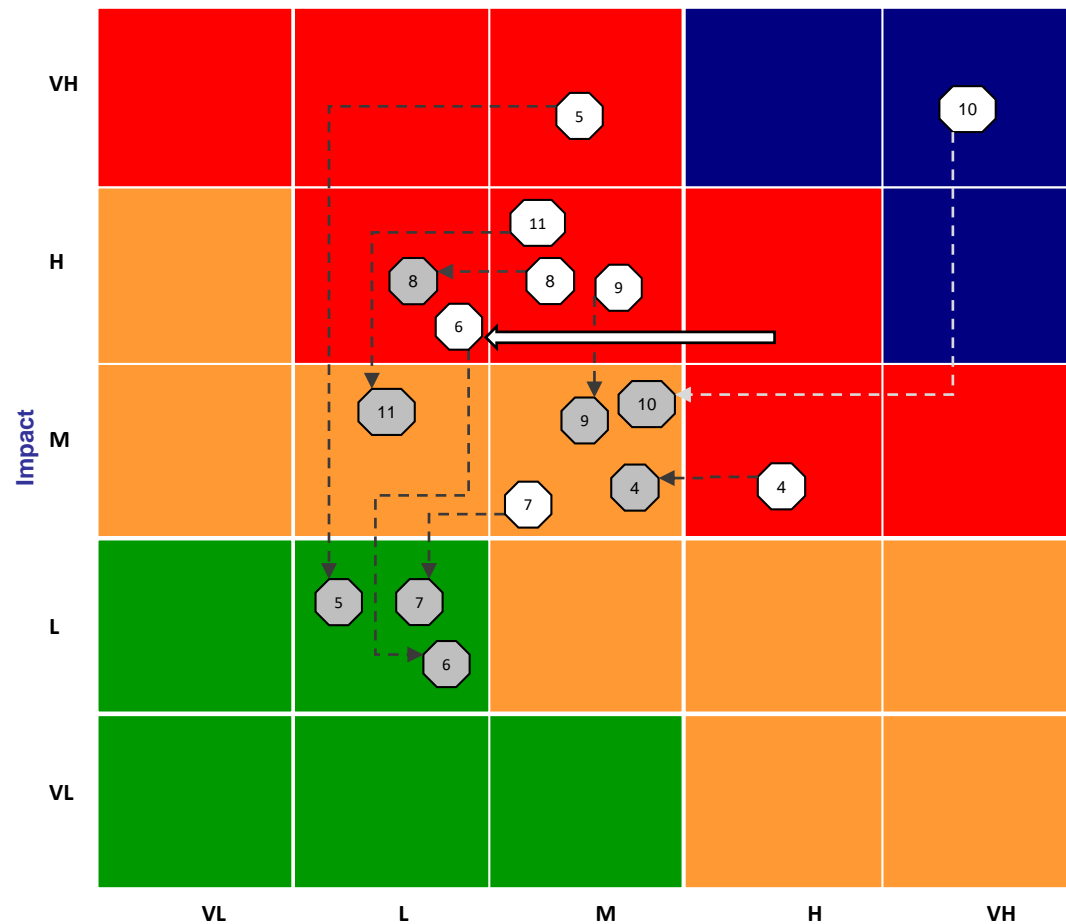
## LONG-TERM

Ref	Risk Trend	Risk Description	Risk Owner	Working Lead(s)	Target position
4 H v M	↔	<b>PEOPLE</b> Failure to attract, recruit and retain a diverse and representative workforce and support their progression within the organisation	Chief of Corporate Services	Director of HR	M v M
5 M v VH	↔	<b>CAPABILITY</b> Failure to ensure our workforce is appropriately skilled to deliver effectively in a changing environment	AC Professionalism	Director Learning	L v L
6 L v H	↓	<b>MONEY</b> Failure to demonstrate and articulate the Met's efficiency, VfM and financial agility leading to low confidence from our funding partners and potential loss of funding	Chief of Corporate Services	Director of Finance Director of Strategy and Governance	L v L
7 M v M	↔	<b>TECHNOLOGY</b> Conservative approach to implementing technology and use and access to data impedes delivery – reduces ability to capture benefits, in particular qualitative benefits, of maximising value from data & technology	Chief Digital and Technology Officer	Digital Policing Directors Director Strategy & Governance Transformation Director Director of Commercial Services Heads of Profession	L v L
8 M v H	↔	<b>CRIME PREVENTION</b> Insufficient and ineffective crime prevention fails to prevent victimisation and undermines community confidence in policing	AC Professionalism	Head of Profession – CP, Inclusion & Engagement	L v H
9 M v H	↔	<b>PUBLIC &amp; LOCAL ENGAGEMENT</b> Our diversity and inclusion initiatives, communication and engagement activities do not have the positive impact sought in raising confidence amongst Black communities and other groups where a confidence gap exists	AC Professionalism	Head of Profession – CP, Inclusion & Engagement	M v M
10 VH v VH	↔	<b>LEGITIMACY</b> <i>Legitimacy in the Met is weakened</i>	Deputy Commissioner	Director of Strategy and Governance	M v M
11 M v H	↓	<b>ESTATES</b> Failure to adapt sufficiently to new ways of using our buildings results in higher estate costs than affordable; and / or budgetary caps on estates spending resulting in estates provision that impedes our operational delivery	SRO Estates Programme	Director of Property Services	L v M

## SHORT-TERM HEAT MAP



## LONG-TERM HEAT MAP



## Alignment with Met Direction pillars

Focusing on what matters most to Londoners			<b>8</b>	
Mobilising partners and the public			<b>1</b>	
Achieving the best outcomes in pursuit of justice and in the support of victims				
Seize the opportunities of data and digital tech to become a world leader in policing		<b>7</b>	<b>2</b>	
Care for each other, work as a team and be an attractive place to work			<b>11</b>	
Learn from experience, from others and constantly strive to improve			<b>5</b>	
Be recognised as a responsible, exemplary and ethical organisation			<b>3, 4, 6, 9</b>	<b>10</b>