MOPAC | MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

METROPOLITAN POLICE

MPS-MOPAC JOINT AUDIT PANEL
4 July 2022

MPS Draft Annual Governance Statement and Governance Improvement Plan
Report by: Acting Chief of Corporate Services

Report Summary

Overall Summary of the Purpose of the Report
This report includes the draft Annual Governance Statement (Appendix 2) and provides an update on last year's Governance Improvement Plans (Appendix 1). Looking at progress made in the past year, we identify those actions that will need to be carried forward. The draft AGS assesses the robustness of governance controls across the framework and progress against all improvement areas. It also highlights areas where issues or scope for improvement have been identified.

Interdependencies/Cross Cutting Issues
Both documents cut across areas of improvement highlighted through inspections, audits, performance monitoring, risks, and senior leaders' assurance statements. As such, they have significant interdependencies with other Audit Panel agenda items – specifically HMICFRS recommendations, DARA audits, as well as our Risk Management activity and MOPAC's own AGS and Governance Improvement Plan.

Recommendations

The Audit Panel is recommended to:
a. Note the progress made on the 2021/22 Governance Improvement Plans and the areas where further progress is required.
b. Note the proposed governance improvement areas for 2022/23: **carried forward** at 1.11 and **new** in the Amber box in each AGS section at Appendix 2
c. Agree the draft AGS (Appendix 2), noting that before finalisation it will be complemented 1) to address the feedback received from DARA and 2) to pick up outstanding actions from the Governance Improvement Plan 2021/22.

1.   Supporting Information

Key updates on the 2021/22 governance improvement plans

1.1.   Detailed plans are attached in Appendix.

1.2.   **Plan 1: Capability, Learning and Development.** The launch of the Learning Target Operating Model (LTOM) is dependent on the corporate Learning Management System (LMS). Although testing on the LMS continues apace, the 'Go Live' date has now been set back to the end of August 2022. There are significant complexities in the programme, and some issues filling of specialist roles in L&D, causing some slippage in delivery times.

1.3.   **Plan 2: Organisational Learning (OL).** Although the OL function is established within CPIC, resourcing issues are impacting speedy OL development such as the implementation of learning hubs across the Met, with revised implementation dates now proposed as Q2 2023/24. Progress towards the development of an OL app continues with Digital Policing.

1.4.   **Plan 3: Public and Partner Engagement.** The rollout of Police Encounter Panels began successfully in May 2022. The MPS Engagement Handbook has now been published. Although the projected 12 Positive Action Initiatives (PAI) per BCU were not been achieved in 2021/22, activity picked up substantially in Quarter 4 – which provides confidence that the ambition, now embedded in the performance framework, can be further expanded in 2022/23.

1.5.   **Plan 4: Assurance Controls, Levels 1 and 2.** The review of Public Protection policies continues on track. Investigation policy reviews are also ongoing. New work is being developed to review policies in the light of CONNECT's implementation (which may affect some processes and therefore dictate some policy tweaks).

1.6.   **Plan 5: Data Management.** The 'Year of Quality', launched January 2022, will continue through 2022, seeking to embed good practice through the organisation. A new Head of Data Foundations and Head of Data Science have been recruited. Good progress continues to be made across most actions, such as the setting up of a new Information Asset Owners (IAOs) Portfolio Group meeting.

1.7.   **Plan 6: Competence and Standards of Professionalism** The new Vetting IT system is now live, and is being brought online in a phased rollout over the next four months. The second phase of the Professional Standards Transformation Programme is underway reviewing Professional Standards Units. A Complaints Resolution Unit, which was established in February 2022, has been strengthened by the appointments of LROs for each risk, and dedicated analyst support.

1.8. The following pending or delayed actions will be taken forward in the 2022/23 Governance Improvement Plan, as well as the ones identified in the draft AGS at Appendix 2.

Outstanding GIP actions by CIPFA Governance area	
2- Ensuring openness and comprehensive stakeholder engagement	
CPIE Increase dialogue with communities on specific issues to build trust	CPIE will map existing engagement groups against census data (when available) to identify engagement gaps. A number of new forums have been established including Jewish, youth and trans/non-binary supported through CPIE.
3- Defining outcomes in terms of sustainable economic, social and environmental benefits	
Data Office Establish purposeful links between Data Board and local data reporting including; Data Quality and Ethics Boards (DQEAB) on BCUs and other OCUs; Information Asset Owners (IAO)	Two things will continue as BAU to mature the MPS response for Data Quality; A) Year of Quality – Launched Jan 2022, runs until Dec 2022. B) Information Asset Ownership (IAOs) – Plan approved, contract established with IAOs (Commander or Equivalent) and Data Office. Training package for IAOs to be completed. Final part delayed i.e. start of IAO Portfolio Group due to change in Commanders. First meeting June 2022 (will be 6-weekly feeding Data Board)
4- Determining the interventions necessary to optimise the achievement of the intended outcomes	
CPIC Completing a review of Public Protection Policies and widen to look at the HoP Investigation portfolio	The review of the Investigation policies has now begun. Other work streams include a review of the existing policies that will be impacted by the introduction of CONNECT and this will be an area of focus in the next quarter. Expected completion Q3 2022/23
5- Developing the entity's capacity, including the capability of its leadership and the individuals within it	
L&D New Learning Target Operating Model: the Learning transformation programme will clarify processes, controls and responsibilities:	Dependency with LMS Go Live has resulted in re-profile of mobilisation date to Q2 2022/23. There are significant challenges filling specialist roles critical for creating new capability in L&D. Work on new L&D business processes and governance arrangements is in full flight, and due to conclude mid-July.
L&D Move to a blended curriculum to allow learners to access digital content including on-demand at the point of need.	Transformation of the core investigative training (PIP2) (targeting Nov 2022 launch) and the first line managers 'on promotion' course (targeting Sept 2022 launch) continues.
L&D Implementation of an integrated corporate Learning Management System (LMS)	LMS Go-Live date re-profiled to August following challenges with the build and testing of LMS / PSOP interface. Interface between the LMS and the Firearms Asset Management System is scheduled to go live in 2023 due to complexity of work.
6- Managing risks and performance through robust internal control and strong public financial management	
CPIC Embedding a Level 2 Assurance capability within CPIC in support of the Heads of Profession (HoP)	A comprehensive strategy and approach has been developed that incorporates all known Level 1 and level 2 activities and seeks to embed Continuous Improvement within each. Initially this is focussed on Public Protection, but will expand into other BCU strands. Expected completion Q4 2022/23
CPIC Embedding an enhanced Organisational Learning and Research function in CPIC	The Met's Corporate OL and Research function is established within CPIC, but resource constraints are impeding progress onfour OL project strands and in rebalancing the existing team. Expected resolution Q4 2022/23.

CPIC Implementing BCU/OCU Organisational Learning Hubs	SW and AS BCUs are operating. AW and CN commenced build in January 2022; SN and WA in process for Q2 2022/23. Significant demand to establish more OL Hubs. Expected completion Q2 2023/24.
CPIC Development of a repository to capture and disseminate OL across the MPS in a standardised way	Systemising information is focused on information flows to capture, escalate and socialise learning and to build corporate memory. OL App is now in process mapping with DP with initial App build due Q2 2022/23.
CPIC Embedding a process to capture, categorise and share learning from Gold Groups / Critical Incidents	Learning from high harm/risk has been focused on supporting learning on Gold groups and with Heads of Profession/LROs, including Op Lilford thematic analysis and timeline development. Qualitative analytical support currently paused due to resource constraints. Expected resolution Q4 2022/23
CPIC Embedding a culture of learning across the MPS	Extension of psychological safety and reflective practice, and potential new academic/partner projects in discussion. Expected completion Q4 2023/24
S+G Train key contacts in business groups to strengthen Risk Maturity	DARA published their Risk Maturity Audit in December 2021 which made a number of recommendations which the team are working through in conjunction with the training plan.
7- Implementing good practices in transparency, reporting, and audit to deliver effective accountability	
CPIC Embedding a Level 1 Data Quality Ethics Assurance process.	The Data Quality Ethics Assurance Board (DQEAB) is a Level 1 data assurance process which concentrates on public protection and related areas. One of the main ambitions of the DQEAB is to empower local BCUs with the tools to complete their own level one inspections, enabling local supervisors to check on what is working well. In Q3 2020/21 the DQEAB was expanded to include reviews of the usage of RUI (Released Under Investigation) and Outcome 16 (Victim support for investigation withdrawn) Crime closures. The DQEAB process is currently paused pending a decision on the way forward and next steps.
Commercial Ensure all Commercial Contracts where data processing is required are DPA (2018) compliant	Coupa Risk Assess has been implemented enabling Commercial Services to manage and report on information assurance as standard. Further work is being undertaken to ensure full transparency of completed DPIAs and Data Processor Contracts to ensure DPA compliance across the entire commercial lifecycle. Full implementation Q3 FY 2022/23

Assurance mapping

1.9. A meeting took place 10 June with Jon Hayes, Julie Norgrove, David Esling and Roisha Hughes and Pierre Coinde from the Met to agree review how the MPS can strengthen assurance through an assurance mapping exercise, through a combination of possible methodologies (by mapping levels of assurance against each core function; reviewing controls and gaps in the identified corporate risks; or bottom-up by mapping what information about assurance leaders across commands and departments have).

1.10. There are existing pockets of assurance activity at Level 1 and 2, in particular through CPIC, Heads of profession, Finance and Commercial, which the MPS would benefit from joining up. DARA recommended to look at the TfL and LFB assurance models to inform the MPS methodology. The Acting Chief of Corporate Services agreed to convene CPIC and other strands active in the assurance field to build a plan of approach over the summer, with support from DARA.

Draft Annual Governance Statement

1.11. This year we have continued to work to align the AGS more closely with the CIPFA principles, alongside our corporate risks, DARA audits, HMICFRS inspections and corporate activities – in particular around trust. We have sought to keep the document as short as possible and focused on salient areas where good progress has been made and where substantial further improvements remain necessary**.**

1.12. The AGS reflects on current governance controls and outlines improvements in the near to medium term. Evidence is drawn from a substantial body of material including current progress against existing governance improvement areas, assessments provided by senior leaders across all major commands; HMICFRS inspections, DARA audits, the corporate risk register; and progress against the Met business plan.

1.13. The AGS aims to control risks to the organisation by ensuring robust governance frameworks or action plans are put in place in the areas it identifies for improvement. Quarterly progress updates on the governance improvement plan will continued to be reviewed by the Chief of Corporate Services and tabled at Audit Panel. Process for this will be aligned with corporate risk processes and those updating progress on HMICFRS and DARA recommendations. We also met with MOPAC's lead with a view to aligning the MPS approach further with MOPAC's.

1.14. The draft AGS was shared with DARA which fed initial comments that will be addressed in the final version. These include in particular:
   - Some improvement areas need to be more strategic – particularly around risk management and assurance (*We will add this to final version*)
   - More on what the Met has done with improvement areas from last year and progress left to do (*All pending actions from last year's Governance Improvement Plan will be picked up in the new GIP*)
   - Light on Finance and should refer to the Financial Management Code – from this year organisations are required to have conducted a self-assessment and compliance with the code – we need to point this out (*Finance will be asked to include*)
   - Commercial, Estates and HR could have more coverage (*We will consider for to final version*)

1.15. Overall we conclude that the Met has an acceptable system of internal control which facilitates the effective exercise of the Commissioner's functions. Evidence from our 2021/22 review of the Met's internal control environment suggests that we have made good progress against most governance improvement plans – we will however continue work on those where delivery is ongoing such as Learning and Development and Organisation Learning.

1.16. Proposed areas of focus for the forthcoming year are outlined at the end of each AGS section.

2.   Equality and Diversity Impact

The governance improvement plans contain a number of actions that aim to strengthen our engagement of communities and impact positively on equality and diversity within the Met and externally.

3.   Financial Implications

There are no direct financial implications from this report. The costs associated with the areas of work identified in this report will be met from the relevant unit's budgets.

4.   Legal Implications

MOPAC and the Commissioner of Police are both under a statutory duty to approve an Annual Governance Statement (AGS). In order that it can discharge the duty, the MPS prepares an AGS, against the CIPFA Principles (Delivering Good Governance in Local Government: Framework 2016), which demonstrates how aspects of governance have been implemented within the service, and from which the Governance Improvement Plan stems.

5.   Risk Implications

The annual governance review identifies significant governance areas for improvement across the Met. These are monitored quarterly and aligned with corporate risk processes

6.   Contact Details

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7.   Appendices and Background Papers

Appendix 1: Met Governance Improvement Plans 2021/22 update
Appendix 2: Draft Annual Governance Statement 2021/22

Governance improvement area 1: Capability, Learning and Development

Aim	Governance area owner	Working lead(s)
We have clear and effective governance arrangements to develop the capability we, and our workforce, need to address demand.	AC Professionalism	Director Learning

RELATED CORPORATE RISK: Risk 2 New Systems / Risk 4 People / Risk 5 Capability
CIPFA PRINCIPLE ALIGNMENT: E) Developing the entity's capacity, including the capability of its leadership and the individuals within it.

AGS 2020-21 and risks findings we are aiming to address (internal and from HMICFRS and DARA)

- Delivery of our significant Change Programme on Learning (P8)
- Progress implementation of the Learning Management System
- Met's 2020/21 Statement of Internal Control review flagged that only 49% of respondents have "confidence that processes to identify the skills and abilities needed in my area of responsibility are effective and that our recruitment, training and learning and development processes deliver the capability and leadership we need"

Assurance mapping

Level 1 including internal management controls, policy, procedure, strategy, process and systems	Level 2 including management scrutiny and oversight, including formal reporting mechanisms and performance reporting	Level 3 including independent oversight provided by internal audit and inspection conducted by HMICFRS and other inspectorates
A	G	A
- Strategic Learning and Development Board (co-chaired by the Commander Learning and Development and the Head of Curriculum/Learning Technology) - Extended Learning and Development SLT chaired by Director- Learning	- People & Learning Board (chaired by Deputy Commissioner) - Learning and Development Executive Steering Group (chaired by AC Professionalism) - P8 Programme Board (chaired by Director - Learning - Transformation infrastructure (Design Authority, Assurance Board etc.) supports the development of the TOM and Business case. - Indicators monitored through Performance Framework: Number of active users on LinkedIn Learning, Completion rate for specified priority training area, Content creation, and Staff Survey. - LMS Project Board (chaired by P8 Programme Director) - Learning Tom Project Board (chaired by P8 Programme Director)	DARA AUDIT - Operational Training – L&D Framework (Advisory)

Governance improvement plan 1: Capability, Learning and Development

Governance improvement & controls you are putting in place (including in response to DARA / HMICFRS recommendations)	Lead	Time scale (by when)	UPDATE ON PROGRESS TOWARDS IMPLEMENTING THESE CONTROLS (to be updated quarterly)	Status (Red Amber Green)
1. Mobilisation of new **Learning Target Operating Model (LTOM):** Learning transformation programme (P8) will clarify processes, controls, ambitions and responsibilities:	Alex Walsh	Q1, 2022/23	• Dependency with LMS Go Live has resulted in re-profile of mobilisation date to Q2 2022/23. New L&D capabilities and services require the LMS to enable. • Significant challenges filling specialist roles critical for creating new capability in L&D. External campaigns are not delivering as expected / having to be re-run. This has caused slippage to the original plan leading to new financial pressure (contingency arrangements involve the use of contractors) and operational risks (key personnel not able to own design of new processes and governance). Further pressure arising from the detailed work undertaken in respect of the resources needed in the model to drive the full benefits of the LMS across L&D and HR service lines. • Work on new L&D business processes and governance arrangements is in full flight. Due to conclude Mid-July. Window for readiness checks and assurance before LMS Go Live running very tight. • Managing significant internal transformation alongside notable additional and unplanned demand into L&D linked to Year 3 Growth (incl. extension of IPLDP delivery) is driving added complexity / risk.	(green)
2. Move to a **blended curriculum**: Creation of an infrastructure to allow learners to access digital content including on-demand at the point of need. Ability for training to be tailored to specific groups in line with assessed skills gaps. All training will be linked to master learner record in the LMS.	Alex Walsh	Q1, 2022 /23	• Range of new digital content rolled out showcasing potential of self directed digital learning (e.g. Full Access PNC, Agonal Breathing package, new handcuffing policy). • Transformation of the core investigative training (PIP2) (targeting Nov 2022 launch) and the first line managers 'on promotion' course (targeting Sept 2022 launch) continues. This will move both from 'one and done' face to face courses to blended learning development programmes uplifting current content and learning approaches in support of strengthening capability and performance. Opportunities for new content to be rolled out to the existing workforce as CPD will be maximised. • Dependency with LMS Go Live (LMS needed to host new learning material, target learning and hold the master learning record) means full impact and benefits of the work to modernise and uplift the core operational curriculum cannot be realised until the LMS is live.	(green)
3. Implementation of an integrated corporate **Learning Management System (LMS) will deliver**: Introduction of a single master training record for all officers and staff / provision of accurate and fully up to date MI on skills and capabilities and where these are / ability to target, close gaps and succession plan/provide the base infrastructure to modernise then transform the Met's approach to learning.	Alex Walsh	Q1, 2022 /23	• LMS Go Live re-profiled to August following notable challenges with the build and testing of LMS / PSOP interface. LMS Go Live now planned for 22nd August with high delivery confidence assessment. Live work in respect of UAT approach and Cutover Planning may present an opportunity to pull this forward marginally. • Focus remains on implementing a Minimal Viable Product (MVP) then delivering further enhancements to the technology once live • LMS testing progressing well. SIT has completed, with SIT Exit taking place on 20th May as planned. UAT commenced on 30th May as planned. UAT is tracking to plan with UAT Exit scheduled for 8th July. • LTOM FBC financial case being updated for presentation back to PIB in July / August • Interface between the LMS and the Firearms Asset Management System is scheduled to go live in 2023 due to complexity of work and need to align with AMS implementation. Lack of available PM from TD is putting notable pressure into this timeline which is now slipping.	(amber)

Governance improvement area 2: Organisational Learning (OL)

Aim	Governance area owner	Working lead(s)
We are a learning organisation. We learn from our experiences and from others to improve what we do, supported by good governance and by a culture sustaining transparency and trust.	AC Professionalism	Director, CPIC Head of Org. Learning

RELATED CORPORATE RISK: Risk 3 Standards / Risk 5 Capability
CIPFA PRINCIPLE ALIGNMENT: E) Developing the entity's capacity, including the capability of its leadership and the individuals within it

AGS 2020-21 and risks findings we are aiming to address (internal and from HMICFRS and DARA)

- Embedding the new OL framework, to help us identify, analyse and socialise knowledge and learning across the Met and with our partners, evaluating what works to improve practice
- Progress the implementation of OL Hubs across the Met
- Processes for research partnerships and co-governance including MOU, Information Sharing protocols and third party contracts, academic bursary scheme

Assurance mapping

Level 1 including internal management controls, policy, procedure, strategy, process and systems	Level 2 including management scrutiny and oversight, including formal reporting mechanisms and performance reporting	Level 3 including independent oversight provided by internal audit and inspection conducted by HMICFRS and other inspectorates
A	G	A
- Local BCU/OCU Organisational Learning Hubs and repositories - Local BCU/OCU Boards (monthly) - Organisational Learning Implementation Steering Group - DLS/DPS/IRSC/SCRG high risk group - Research & EBP Group - CT EBP Group	- Monthly PLB chaired by Chief of Corporate Services - Quarterly Organisational Learning Board chaired by AC Professionalism - Bi-monthly Head of Profession Meetings - Research Faculty Steering Group - MPS Research Ethics Committee	- DARA AUDIT - Organisation Learning Assurance - DARA FOLLOW-UP AUDIT - Organisational Learning Framework – Governance of Gold Groups - HMICFRS Recommendations - IOPC Learning Recommendations

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Governance improvement plan 2: Organisational Learning

Governance improvement & controls you are putting in place (including in response to DARA / HMICFRS recommendations)	Lead	Timescale (by when)	UPDATE ON PROGRESS TOWARDS IMPLEMENTING THESE CONTROLS (to be updated quarterly)	Status (Red Amber Green)
Embedding an enhanced Organisational Learning and Research function in CPIC	Paul Clarke/ Ross Daniels	Q2 2022/23	The Met's Corporate OL and Research function is established within CPIC, comprising an OL implementation team and a Research Faculty. OL implementation continues to be focused on four areas – implementing the OL framework; systemising information, knowledge and memory; learning from high harm/risk; and embedding a culture of learning. Each is covered in more detail below. **Significant resource constraints are impeding implementation progress**, in lack of budget to recruit required capabilities for four OL project strands and in rebalancing the existing team. Expected resolution Q4 2022/23 (slippage from Q2).	■■■
Implementing BCU/OCU Organisational Learning Hubs across the MPS	Paul Clarke/ Ross Daniels	Q4 2022/23	**Implementing the OL framework**, developing our model into practice in a number of BCUs. SW and AS BCUs are operating. AW and CN commenced build in January 2022; SN and WA in process for Q2 2022/23. OCU implementation at Firearms, MO6, CT, IRSC. SCRG, DPS. Significant demand with 47 OL Hubs to establish. **BCU capacity/lack of dedicated resource remains a key risk**. Additional support from DAC, Commanders and many BCU Commanders is enabling some progress. Blueprint BWT negotiations for OL hub roles ongoing. Expected completion **Q2 2023/24 (slippage from Q4 2022/23) . OCU hub implementation currently paused due to resource constraints.**	■■■
Development of a repository to capture and disseminate OL across the MPS in a standardised way	Paul Clarke/ Ross Daniels	Q4 2022/23	**Systemising information** is focused on information flows to capture, escalate and socialise learning and to build corporate memory. We have worked with DP and Transformation to develop our OL within scoped Met systems. This includes: • Focus on automation and semi automation. • Utilising existing IT – MS, SharePoint, Power Apps to make knowledge more accessible. **Critical DP dependency** • Development of the Repository – creation of subject specific landing pages as repositories to enable organising of knowledge. Several in construction such as MISPERS which feature core knowledge, Policy and OL. • OL app with MS and DP. OL App is now in process mapping with DP with initial App build due **Q2 2022/23 – with the full action itself slipping to Q4 2022/23.**	■■■
Embedding a process to capture, categorise and share learning from Strategic Gold Groups/ Critical Incidents	Paul Clarke/ Ross Daniels	Q1 2022/23	**Learning from high harm/risk** has been focused on supporting learning on Gold groups and with Heads of Profession/LROs, including Op Lilford thematic analysis and timeline development. The team have supported Daniel Morgan and OP Drayfurn, more recently Child Q and Strip Search. **Qualitative analytical support currently paused due to resource constraints.** Expected resolution **Q4 2022/23, slipping from Q1 2022/23**	■■■
Embedding a culture of learning across the MPS	Paul Clarke/ Ross Daniels	Q1 2023/24	**Acculturalisation** is supported through run off of the Open University OL phase 4 project. Work continues to update and socialise the 'blame to praise' model for local implementation, and to develop communications and online materials. Extension of psychological safety and reflective practice through local MPS Implementation (SW BCU) is underway, and potential new academic/partner projects in discussion. **Slippage from Q1 to Q4 2023/24**	■■■

Governance improvement area 3: Public and Partner Engagement

Aim	Governance area owner	Working lead(s)
The Met is a trusted partner, we are effective in mobilising partners to keep London safe for everyone. We build relationships and engage with communities across London, to prevent crime and inspire trust and confidence in policing.	AC Professionalism	Commander - Crime Prevention, Inclusion and Engagement

RELATED CORPORATE RISK: Risk 1 Violent Crime / Risk 8 Crime Prevention / Risks 9 Public & Local Engagement
CIPFA PRINCIPLE ALIGNMENT: B) Ensuring openness and comprehensive stakeholder engagement / C) Defining outcomes in terms of sustainable economic, social and environmental benefits

AGS 2020-21 and risks findings we are aiming to address (internal and from HMICFRS and DARA)

- Strengthen and develop the London Safety Centre, building on the agreed vision paper
- Establish clear partnership priorities, work effectively with partners to bear down on violence; and develop operational partnerships
- Roll out of Positive Activity Initiatives across all BCUs,
- Increase dialogue with communities on specific issues to build trust (e.g. tactics such as Stop and Search) and
- Capture Engagement Activity: The HMICFRS' 2019 Integrated PEEL inspection (Legitimacy: Good) suggested the Met did not centrally monitor engagement activity,
- Delivery and implementation of a refreshed Inclusion, Diversity and Equality Strategy (STRIDE) and governance mechanisms
- Roll out 'Police Encounter' panels across London from April 2021

Assurance mapping

Level 1	Level 2	Level 3
A	G	G
- STRIDE 2021 – 2025 - Mayors Action Plan - STONEWALL Workplace Equality Index assessment 'Disability Confident 3' independent assessment 'Inclusive Employers' independent assessment	- STRIDE Governance structure - Crime Prevention & Trust governance structure: Board (AC Prof) > Delivery Grps (Cmdr CPIE) > Working Grps (CI CPIE) - Frontline Neighbourhood board - A 'Use of Force Strategic Oversight Group' was formed in June 2020. - The Deputy Commissioner's Delivery Group established in November 2020 - LGBT+ Organisational Improvement Group – with external representation - Disability Delivery Group – with external representation - London Safety Centre Delivery Group + the Engagement Delivery Group – both reporting into the Crime Prevention and Trust Board	- MOPAC scrutiny as part of the Police and Crime Plan through the Safer Children and Young People's Board. - DARA AUDIT - Met Engagement Governance Framework - DARA FOLLOW-UP AUDITS - Strategic Framework Supporting Partnership Arrangements/Agreements + STRIDE Implementation Plan - MOPAC Oversight Board - MPS STRIDE Delivery Board, attended by MOPAC and other external groups including IAGs - Commissioners External Advisory Board – also attended by MOPAC.

Governance improvement plan 3: Public and Partner Engagement

Governance improvement & controls you are putting in place (including in response to DARA / HMICFRS recommendations)	Lead	Timescale (by when)	UPDATE ON PROGRESS TOWARDS IMPLEMENTING THESE CONTROLS (to be updated quarterly)	Status (Red Amber Green)
Strengthen and develop the **London Safety Centre**,	Cdr Helen Harper	March 22	The transfer of key crime prevention and volunteering posts from CPIC to the LSC has been completed. There is now a band A in post to lead on the recruitment and strategic oversight of the LSC and the Volunteers. The recruitment of 6x PCSOs as a PAI deployment team Is well underway with all posts now filled. A community reference group is being established for the LSC.	
Establish **clear partnership priorities**,	Cdr Heydari (A/DI REEVE)	COMPLETE	BCU Core commitment: monthly meeting with key strategic partners such as the Chief Executive and local community safety leads have been held and commitments have been met	
Roll out of **Positive Activity Initiatives (PAI)** across all BCUs.	Cdr Helen Harper	March 22	Now a KPI in Pillar 2 Corporate performance framework 21/22 - *at least 12 per year per BCU*. Performance managed through Crime Prevention & Trust governance structure with delivery through BCU TTCGs and Silver Group. The delivery of the PAIs is a risk – **our initial performance objectives of 12 x PAIs for this financial year per BCU will not be achieved in 21/22**. That said, the process of the PAIs has been established across all BCUs, and the LSC is seeking every opportunity to progress this action as far as possible. Due to the impact of Covid 19 regulations on personal contact and therefore on PAIs, delivery levels have been reviewed by the Crime Prevention and Trust Board. Renewed focus will be a key requirement for BCUs in 2022-23. 73 PAIs are confirmed as fitting all criteria, with a further 15 recorded which did not include the full survey requirement (88 total activities) **with 896 individual positive engagement deployments recorded in 21/22**. This total has taken into account the impact of COVID on demand and restrictions during lockdown periods. Whilst still a risk, we have made significant forward progress and processes are now in place to ensure consistent delivery with close collaboration between FLP and CPIE.	
Delivery and implementation of a refreshed **Inclusion, Diversity and Equality Strategy** and governance mechanisms	Cdr Helen Harper	Delivery Oct 21	The new Stride strategy was launched during National Inclusion Week w/c 25th September. Performance is currently measured through the STRIDE Delivery Board, Chaired by AC Professionalism, and this will be further embedded into CPIE processes in Spring 2022. Tier 1 partners/stakeholders consulted for views on strategy and content of the next plan. This is ongoing progress is consistent and good.	
Roll out **'Police Encounter' panels** across London from April 2021	Cdr Helen Harper	May 22	The roll out was delayed due to the complexities of Data Protection and legal sharing of data and footage. The BCUs have reinvigorated their readiness to roll out status so that launch can commence as soon as possible after the DPIA sign off. The initial PEP launch successfully took place in May 22 and PEP membership is advertised on the public website.	

Governance improvement plan 3: Public and Partner Engagement

Governance improvement & controls you are putting in place (including in response to DARA / HMICFRS recommendations)	Lead	Timescale (by when)	UPDATE ON PROGRESS TOWARDS IMPLEMENTING THESE CONTROLS (to be updated quarterly)	Status (Red Amber Green)

Increase dialogue with communities on specific issues to build trust	1. Cdr Heydari (A/DI REEVE)
	 2. Cdr Connors (A/INSP WAINHOUSE)
	 3. Cdr Helen Harper
		1 COMPLETE.
		 2. May 21
		 3. Jan 22
			1. FLP core-commitments and an engagement action plan - **This has been completed**
			 2. Stop & search: a corporate narrative exists assist in community conversations and the community engagement product "A Different View" is now utilised. **The stop and search work is an ongoing rolling programme with local engagement and initiatives it will continue to be developed.**
			   • As of January 2022 over 66 Community Monitoring Groups screenings of BWV have been facilitated across 23 Boroughs. Any learning or recognition of good practice is managed by the local lead and collated centrally to identify emerging themes, which in turn feed into wider organisational learning. During stop and searches, MPS officers are directed to activate their BWV at the earliest possible opportunity in order to maximise the potential to capture evidence. This is included in the reviewed and updated MPS BWV Policy and Guidance and is clearly communicated in the MPS online e-learning training. The MPS was the first police force in England to extend the pre-event buffer from 30 seconds to one minute. We really value being able to offer extra video footage both in terms of achieving best evidence and in raising confidence and trust with our communities and partners
			   • **Violent Crime Task Force (VCTF) -The Person behind the Search -** This initiative involves engagement with officers from specialist units in community workshops with young people and their guardians. During the sessions, the young people are encouraged to play the role of the police and explore decision making by officers. Similarly, officers have sometimes played the role of a member of the community.
			   • We've transformed our training and actively encourage our communities for their input into it, with a focus on preventing encounters escalating, so that where stop and search is needed, it is undertaken calmly, politely, where possible without the need for handcuffing and with empathy about the impact it has on members of the public.
			 3. CPIE will map existing engagement groups against census data (when available) to identify engagement gaps. A number of new forums have been established including Jewish, youth and trans/non-binary supported through CPIE. Increased external representation in Gx Groups and various organisational improvement groups. We continue to work with MO6 Public Order to explore the opportunities to engage based upon the many events held in London each year and to evolve the strategic role of "Bronze Engagement" within our event command teams where there are pan-London community aspects (e.g. Pride in London 22)	

MPS Engagement Handbook HMICFRS' 2019 PEEL - the Met did not centrally monitor engagement activity	Cdr Helen Harper	**COMPLETE**	The Engagement handbook has been presented to the MPS Engagement Delivery Group, the Deputy Commissioner and the DCDG and has now been published. It will be uploaded to the public website imminently. The handbook signposts members of the public to our established engagement opportunities and explains how people can get involved locally.	

Governance improvement area 4: Assurance Controls Level 2 and 1

Aim	Governance area owner	Working lead(s)
Senior Leaders have assurance that the right controls are in place and are working effectively at all levels of the organisation.	AC Professionalism	Director, CPIC working with Heads of Profession

RELATED CORPORATE RISK: N.A. . CIPFA PRINCIPLE ALIGNMENT: E) Developing the entity's capacity, including the capability of its leadership and the individuals within 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

AGS 2020-21 and risks findings we are aiming to address (internal and from HMICFRS and DARA)

- Embed the Continuous Policing Improvement Command (CPIC) changes and its role to strengthen the Met assurance framework at Level 2 [DARA CPIC Assurance Framework and Organisational Learning]
- Review policies to ensure they are up-to-date, consistent and clear (based on APPs). For example, perform a review of all Public Protection policies by the autumn. With a standard layout, this will better align to national guidance & show where, how and why we might deviate. This will support & guide frontline officers & supervisors, strengthening of Level 1 Assurance.
- Strengthening of operational decision-making and performance monitoring at command levels (Assurance Level 1)
- Improve consistency and management of Disclosure
- Strengthen Risk Maturity following RM survey, introducing better proportionality of decision-making in relation to risks, so the organisation's assurance capabilities can focus on higher risk items

Assurance mapping

Level 1 including internal management controls, including policy, procedure, strategy, process and systems	Level 2 including management scrutiny and oversight, including formal reporting mechanisms and performance reporting	Level 3 including independent oversight provided by internal audit and inspection conducted by HMICFRS and other inspectorates
A	A	A
• The Director of Finance chairs a monthly meeting of relevant Directors and DAC Corporate Services. This considers investment decisions and other matters which are due to go to Portfolio and Investment Board or indeed to the Investment Advisory Meeting.	• Quarterly MPS Public Protection Board chaired by AC FLP • Risk and Assurance Board focuses on the effectiveness of controls and the feed into organisational learning. • Heads of Profession structure supports assurance in their areas.	• HMICFRS PEEL and thematic inspections • DARA Audit and Reviews • IOPC Investigations and Recommendations • ICO oversight • Coroners Reports

Governance improvement plan 4: Assurance Controls Level 2 and 1

Governance improvement & controls you are putting in place (including in response to DARA / HMICFRS recommendations)	Lead	Timescale (by when)	UPDATE ON PROGRESS TOWARDS IMPLEMENTING THESE CONTROLS (to be updated quarterly)	Status (Red Amber Green)
Train key contacts in business groups to strengthen Risk Maturity following RM survey	Tracy Rylance	Q4 2021/22	Following the risk maturity process in 2021, a number of training needs were identified, which the team have been delivering – and will continue to deliver over the next months. Subsequently, DARA published their Risk Maturity Audit in December 2021 which concluded that the Met is at maturity Level 3 'Working' and made a number of recommendations which the team are also working through in conjunction with the training plan.	
Embedding a Level 2 Assurance capability within the Continuous Policing Improvement Command (CPIC) in support of the Heads of Profession (HoP) Embedding a Continuous Improvement approach across BCUs as part of Operation Aegis (Public Protection).	Ross Daniels, CPIC	Q4 2022/23	Within the level 2 environment the core practice teams in the Continuous Policing Improvement Command (CPIC), which lead best practice, policy and improvement within their thematic areas such as Public Protection, are developing more active intervention across the MPS. Level 2 assurance activity is already integral to the Organisational Learning & Research Centre of Expertise, and in the Continuous Improvement & Policy Centre of Expertise. The Heads of Profession are also able to commission Level 2 assurance activity from CPIC. A comprehensive strategy and approach has been developed that incorporates all known Level 1 and level 2 activities and seeks to embed Continuous Improvement (CI) within each. Initially this is focussed on Public Protection, but will then expand into the other BCU strands. The strategy is aimed at building on foundations set by Operation Aegis and will help to ensure early benefits are realised and continue to be delivered. Support, coaching and training is being provided to recently formed Continuous Improvement and Organisational Learning teams, established on EA and AS BCUs utilising existing budget and vacancies. Infrastructure and governance structures have been established that compliment and align with BCU current practices and operating model. This includes the forming of a combined CI and OL board. 3 of the 5 BCUs (NE, CE and NW) that have has Operation Aegis deployed do not currently have dedicated CI or OL capability. This will impact on the ability to sustain and build on the benefits and new ways of working introduced through Operation Aegis.	

Governance improvement plan 4: Assurance Controls Level 2 and 1

Governance improvement & controls you are putting in place (including in response to DARA / HMICFRS recommendations)	Lead	Timescale (by when)	UPDATE ON PROGRESS TOWARDS IMPLEMENTING THESE CONTROLS (to be updated quarterly)	Status (Red Amber Green)
Embedding a Level 1 Data Quality Ethics Assurance process. The process to be widened to include other Head of Profession portfolios.	Ross Daniels, CPIC	Q4, 2021/22	The Data Quality Ethics Assurance Board (DQEAB) is a Level 1 data assurance process which concentrates on the following public protection and related areas; Domestic Abuse, Child Abuse, Mental Health, Rape, Hate Crime, Stalking/Harassment, Missing Persons, CSE & CCE, Indecent Images of Children, Adult Safeguarding and Harmful Practices. One of the main ambitions of the DQEAB is to empower local BCUs with the tools to complete their own level one inspections thereby enabling local supervisors to check on what is working well and what is good practice. Since November 2019 BCUs check on a selection of the above public protection areas (no more than four at a time) on a monthly basis and feed the results into the DQEAB. In Q3 2020/21 the DQEAB was expanded to include reviews of the usage of RUI (Released Under Investigation) and Outcome 16 (Victim support for investigation withdrawn) Crime closures. **The DQEAB process is currently paused pending a decision on the way forward and next steps.**	(Green)
Completing a review of Policies in Public Protection. This will then be widened to look at the HoP Investigation portfolio. + A review of the corporate policy process to identify efficiencies and good practice.	James Archer, CPIC	Q3 2022/23	Public Protection policies continue to be reviewed and updated – child exploitation is currently with the HoP Public Protection for approval. The vulnerable adults policy has just completed consultation and alongside suicide prevention will be submitted for approval in the near future. The modern slavery policy is also currently under review. The review of the Investigation policies has now begun. Other work streams include a review of the existing policies that will be impacted by the introduction of CONNECT and this will be an area of focus in the next quarter.	(Amber)

Governance Improvement Area: Data Management

Aim	Governance area owner	Working lead(s)
To raise the Met's data competence (the means by which we acquire, manage, share, protect, publish and use our data to improve decision making) and data culture (the way we think about and behave with regard to data and its value as an asset).	Director Strategy and Governance	Director of Data

RELATED CORPORATE RISK: Data Risk remitted to Data Board. CIPFA PRINCIPLE ALIGNMENT: D) Determining the interventions necessary to optimise the achievement of the intended outcomes / G) Implementing good practices in transparency, reporting, and audit to deliver effective accountability

AGS 2020-21 and risks findings we are aiming to address (internal and from HMICFRS and DARA)

- Continue progress in improving central data capability (drive data quality; access to data; data analysis; relevant and timely data)
- Redesign the corporate data products portal to provide the right level of data, to the right people through the portal re-design
- Develop an Open Data Strategy, broadening what Londoners and our partners can access directly (with relevant security measures)
- Completion of the Information Asset Register project driven by the Data Office, will support overall business continuity planning, and facilitate corporate oversight, via the Resilience Committee
- Raise compliance with VCOP requirements (supported by CRIS integration completion in Q1 2021)

Assurance mapping

Level 1 including internal management controls, including policy, procedure, strategy, process and systems	Level 2 incl. management scrutiny and oversight, including formal reporting mechanisms and performance reporting	Level 3 incl. independent oversight provided by internal audit and inspection conducted by HMICFRS and other inspectorates
A	A	G
• Regular reporting to the Public (monthly Internet dashboards) on compliance with Information Requests (FOIA 2000) & Right of Access requests (DPA 2018). • MPS Data Strategy (underpinned by Analytics and Data Talent Strategy) launched – December 2019. • Cross-London library of data sharing agreements now in place. • Performance tracking of DPIAs, DSAs and 3018s (live testing) Awareness videos launched for front line to support timely completion of DPA and FOIA requirements • Action Plans in place to improve performance on FOI and DPA compliance. From March, now able to track across MPS (i.e. not just Data Office)	• 6-weekly MPS Data Board established with 3 subgroups established against priority areas (Review, Retain, Disposal; Data Quality; Reporting & Analytics). • Information Asset Register and ROPA being established on what data we hold, accountable leads for that information (IAOs), assets requiring RRD, where DQ issues need to be addressed. • Data Quality Health checks will be BAU in the new year, alongside the launch of a) "A year of quality" Project (launched Jan 2022) and b) Information Asset Ownership Board stood up (Commanders change-over has delayed start date to April 2022). 266	• (July through November) ICO Audit completed. Assessment favourable. Action Plan agreed with Regulator with 3 month milestones for review for next 12 months. First checkpoint completed. On track. ICO/MPS Bi-Lat also completed (Chief Corp Services and Director of data) • HMICFRS Crime Data Integrity Audit completed • Resource secured to conduct a Peer Review of Data Governance processes scheduled for February 2022 • MPS aligned to Home Office (and wider Govt Programme through Cabinet Office) programme to stand up Data Capabilities Centre that will coordinate consistent approach to data & digital capability build (e.g. Data Literacy, Data Quality, Op Model for Analytics etc). Opps to collaborate

Governance improvement plan 5: Data Management

Governance improvement & controls you are putting in place (including in response to DARA / HMICFRS recommendations)	Lead	Timescale (by when)	UPDATE ON PROGRESS TOWARDS IMPLEMENTING THESE CONTROLS (to be updated quarterly)	Status
Establish purposeful links between Data Board and local Data Quality reporting such as; Data Quality and Ethics Boards (DQEAB) on BCUs and other OCUs; key subgroups to Data Board on other capabilities; **Information Asset Owners (IAO**); SCIRG (crime data integrity)	Dir. Data (A.Reed)	March 2022 Extend to December 2022 (YofDQ)	• Significant progress has been made in the last quarter. We have dedicated resources to data about the data" and a performance pack (including DQ measures) and recruited a Head of Data Foundations to drive this area of work. • Two things will continue as Business as usual going forwards to mature the MPS response for Data Quality; A) Year of Quality – Launched Jan 2022, runs until Dec 2022. Themed to the data quality that matters (business-led). Support includes awareness videos, "on the ground" DQ clinics – 1st one SE-BCU, Data Quality health check reporting on critical operational assets for IAOs B) Information Asset Ownership (IAOs) – Plan approved, contract established with IAOs (Commander or Equivalent) and Data Office. Training package for IAOs to be completed. Final part delayed i.e. start of IAO Portfolio Group due to change in Commanders. First meeting June 2022 (will be 6-weekly feeding Data Board)	🟩

Build of Data Office to establish enabling capabilities for governance, analytics, service improvement & data innovation	Dir. Data (A.Reed)	Q1, 2022/23	• **Propose closure of this control and manage recruitment as part of business as usual.**
			• In the last quarter we have; increased temporary support to Data Governance (including ROA), Recruited two key senior manager posts (Head of Data Foundations and Head of Data Science), we continue to joint fund a Data Sharing coordinator (through LoTI) for London, making that a permeant arrangement.
			• Three areas which will be carried forward for next year (as BAU) are;
			    A) As per ICO Audit – splitting DPO from Head of Data Governance (this affects staff so is being managed and is in progress)
			    B) Data ethics – We are reviewing our approach to acquiring data ethics expertise (we are working with the Open Data Institute on this), following a number of failed recruitment campaigns (Hay Banding allocated Band C)
			    C) Allocating and recruiting skills and roles up to £1M following investment by Management Board
				🟧

Data ethics capability build	Dir. Data (A.Reed)	Jan 2022	• See Previous Response above. Propose the controls are merged	🟥

Governance improvement plan 5: Data Management

Governance improvement & controls you are putting in place (including in response to DARA / HMICFRS recommendations)	Lead	Timescale (by when)	UPDATE ON PROGRESS TOWARDS IMPLEMENTING THESE CONTROLS (to be updated quarterly)	Status (Red Amber Green)
Ability to define, monitor and manage demonstrable improvements in Data Quality across core data sets	Dir. Data (A.Reed)	Phase One – March 2022 Runs until December 2022	• Year of Quality commenced in January 2022 (overseen by Data Board and managed by DQ sub-group) • Performance Reporting established (on both eh quality of data held in critical assets, but also local performance on DQ to prioritise where our "on the ground" DQ clinics target support) • Complete refresh of DQ Services provided by third party completed and refocused - complete • DQ Metrics identified and DQ Health check (i.e. monthly reports and dashboards) built (will feed IAO Portfolio Group in April 2022) • Project for RRD with Transformation Directorate (NB. Automated RRD cannot commence until data quality is improved; process remains manual until DQ increases), review of market offer underway	Green
Data Management to be considered as a mandatory element of all transformation, change and innovation planning	Dir. Data (Aimee Reed) + TD	Q3	• Data Office represented at Front Door & Business Design Authority • DPIA now completed at start of Business Case process • Work continues on digital integrated impact assessment (combines DPIA, Ethics and EIA) • Next Phase of work will link Transformation Portfolio more closely to Performance Framework • Data Workshop planned with SROs & PMG in Q1 2022-23	Green
Ensure all Commercial Contracts where data processing is required are DPA (2018) compliant	Dir. Commercial (Mark Roberts)	FY 2021	• 1049 commercial initiation form now requires confirmation that a DPIA has been completed. Skills gaps will be covered as part of MPS-wide Learning Needs Analysis for Data. **COMPLETED Q1 2021/22** • Coupa Risk Assess has been implemented enabling Commercial Services to manage and report on information assurance as standard. Further work is being undertaken to ensure full transparency of completed DPIAs and Data Processor Contracts to ensure DPA compliance across the entire commercial lifecycle. As part of the Schrems2, data has been collected to manage risks associated with sharing of data internationally The response rates for Distribution 1 = 54% and Distribution 2 = 71%. The remaining suppliers are being chased. One supplier has reported that they hold data in the US ,which is currently being followed up on. None of the other suppliers that have responded transfer data to a Third Country (TC) or International Organisation (IO). A review is being undertaken with Legal advisors and Data Office colleagues to review next steps. Full implementation Q3 FY 2022/23	Amber

DRAFT Annual Governance Statement 2021/22
Commissioner of Police of the Metropolis

Contents

Introduction

To meet the demands of policing London effectively, the Metropolitan Police Service (the Met) must have in place a responsive system of governance, with clear mechanisms, processes and relationships through which the organisation is directed and controlled. This means decision-making processes and internal controls that support and strengthen our operational activity.

The Met conducts an annual review of the effectiveness of its system of internal control and publishes this statutory Annual Governance Statement (AGS) with the Statement of Accounts. The document reports on compliance with the Local Code of Governance in identified key control areas and aims to provide assurance that the Met is monitoring and managing governance arrangements set out in the Code effectively. Our Local Code of Governance (Code) is established within the Chartered Institute of Public Finance and Accountancy (CIPFA)/ Society of Local Authority Chief Executives (SOLACE) Framework 2016 with due regard to the Met's operating environment. The overall aim is to ensure that resources are directed in accordance with agreed policy and priorities, that there is sound and inclusive decision-making and clear accountability for the use of resources to achieve desired outcomes.

This draft AGS sets out the Met's current governance arrangements, including controls and processes, reports on their effectiveness during the year and outlines the areas in which we want to improve governance further over the coming year. Amongst those, we highlight HMICFRS inspection of the "Metropolitan Police Service's counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel", where the inspectorate's found the Met's counter-corruption arrangements and procedures had substantial weaknesses – the implementation of the Inspectorate's recommendation will be actively pursued and progress closely monitored. More widely, this document has been informed by the input from senior staff and officers who have responsibility for the development and maintenance of the governance environment, and in consideration of the opinion of the Director of Audit Risk and Assurance.

Overall we conclude that the Met has an adequate system of internal control which facilitates the effective exercise of the Commissioner's functions. The Met's governance framework and arrangements can provide a reasonable level of assurance, but we acknowledge that even if all of areas were effective we would not eliminate all risks. This AGS also outlines how the Met will further improve its governance in the coming year – including through the Command Assessments of Standards-, taking account of the opinions of the Met's internal and external auditors. The DARA audit opinion will be issued later this summer.

Statement of internal control

The Met Statement of Internal Control survey was refreshed in 2021, with over 80 of the most senior leaders across all Business Groups asked to take part. The survey has since 2020/21 been aligned along the seven CIPFA Governance Principles structure. The findings have been analysed and, across all questions, confidence is lower than last year, reflecting that there have been a number of high public profile cases where the Met's integrity has been scrutinised and which perhaps provides leaders less confidence to sign off that - within their area of control – the Met was fully compliant within the headlined governance principles. The areas where Met Leaders identify the need for further action are particularly around Data and Capabilities. The strengthening of controls and processes in these two areas – and other areas of weaknesses highlighted in the document - will be taken forward through our forthcoming Governance Improvement Plan.

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

Assessment of current position and recent progress

We recognise the grave levels of public concern following the kidnap, rape and murder of Sarah Everard and the sentencing of the police officer responsible. Other deeply troubling incidents and allegations have raised further difficult questions for us. We are committed to rebuilding the trust and confidence of all Londoners.

Whilst the section below sets out the structures and strategies we have in place, as well as the recent progress we have made since the publication of our Rebuilding Trust Plan in October 2021, we acknowledge this is an area that needs, and will receive, substantial continued effort, before public trust and confidence can increase.

Our vision is to be the most trusted police service in the world. We contribute to making London safe for everyone and want Londoners to be proud of their police service. As a service we are bound by the national Code of Ethics. Our Competency and Values Framework outlines the behaviours that will help us to deliver a great service to London. Our values (Professionalism, Integrity, Courage and Compassion) shape and guide the way we work. One of the pillars of our strategy, Met Direction, is "to be recognised as a responsible, exemplary and ethical organisation" so our objective is not only to behave in accordance to our values, including integrity, but to be recognised as such by the public, partners, communities and stakeholders.

o   Operations: our Directorate of Legal services provides advice on a wide range of issues such as employment issues, police operations, investigation and use of police powers such as detention, use of force or covert investigatory powers. We have a dedicated professional standards department of more than 350 officers and staff.
o   Complaints, misconducts and counter corruption: the Directorate of Professional Standards leads our response supported by a number of policies, toolkits and guidance to support the reporting of wrongdoing and to mitigate corruption threats. Key areas of focus are sexual misconduct, theft and fraud, drug use and supply, inappropriate associations, organised crime, social media and disclosure of police information.
o   Vetting processes follow the national standards set by the College of Policing. As part of the recruitment process, the MPS vets officers, staff and volunteers to uphold public confidence, national security and safety. Enhanced vetting procedures are in place for sensitive posts. We recognise that vetting is a snapshot in time – and if we determine that an individual has lied during the vetting process, this would be investigated by DPS and can lead to dismissal and criminal investigation.
o   Training: the new PEQF (Police Education Qualifications Framework) is based on the national curriculum developed by the College of Policing – professional standards, ethics and integrity are central components woven through the recruit training programme and supporting assessments.
o   Oversight: there is substantial governance, oversight and scrutiny in place within the MPS and externally to ensure that we act appropriately. The leadership team is accountable for effectively governing the organisation and making ethical decisions. DARA, our internal auditor, has a statutory responsibility to give an annual opinion on the effectiveness of the internal control and governance framework supporting the policing of London. We review and implement DARA's recommendations on an ongoing basis. We are scrutinised and held to account by MOPAC, the Greater London Authority and national government (principally the Home Office). There are a number of formal meetings (such as the Oversight Board with the deputy Mayor). Boards and Committees (such as the

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Home Affairs Select Committee) which are used to monitor how the organisation performs and to ensure we act lawfully and ethically.

o   We are also overseen by independent bodies: Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses and reports on our effectiveness, efficiency and legitimacy – including in the field of counter-corruption. The Independent Office for Police Conduct (IOPC) conducts independent investigations of serious allegations of misconduct or criminal offences and oversees all public complaints and conduct matters. Public scrutiny also holds the Met into account (Mayor's Questions, Freedom of Information requests, independent advisory groups…)

In June 2021 we launched a new Raising Concerns policy, which replaces the existing 'Whistleblowing Policy' and broadens the approach to raising concerns from anyone about anything. We complemented this with an internal communication campaign to raise awareness and confidence in the new policy, and regular Directorate of Professional Standards updates will be provided to staff. We delivered the Inclusive Leadership campaign, which continues to build our leadership capabilities around diversity and inclusion.

In the context of our current Governance Improvement Plan on Competence and Standards of Professionalism, and as part of our delivery of the [Rebuilding Trust Plan](), we have made progress on a number of fronts:

o   A New Counter Corruption Board has been established chaired by DAC Professionalism to review and drive activity against the national counter corruption key areas of risk.

o   A change programme is now set up to look to redesign how the MPS deals with complaints and how the most appropriate model in terms of structure and resources is implemented to do this. The first step is the Complaints Resolution Unit which has been established in February 2022 and will resolve most complaints being submitted through MPS and IOPC portals, with significant reduction of cases referred to Professional Standards Units.

o   A dedicated Vetting Renewal Team is in place to manage vetting renewals and will further be increased in 2022 through recruitment. The backlog of vetting renewals has now been cleared and is being managed through a BAU process.

o   Eleven of the 13 recommendations of the DARA Security Clearance & Vetting follow up report have been implemented. However, notably, the implementation of the new Vetting IT system has been delayed due to a dependency on the core system upgrade and a replacement Met Internet Gateway project to improve performance and download limitations – resulting in slippage to next year.

o   The appointment of Baroness Casey of Blackstock to conduct an independent review of Met culture and standards. The Review will examine our culture and standards of behaviour, and will assess to what extent our current leadership, recruitment, vetting, training, communications and other processes effectively reinforce the standards the public should expect.

Q1) I am confident that officers and staff in my area of responsibility behave with integrity, comply with laws, regulations and policies, and behave ethically   *YES 64%, PARTLY 36%, NO 0%*
SUMMARY FINDINGS

SUMMARY FINDINGS
- This is an area in sharp decrease from last year – undoubtedly linked to the events of recent months. Whilst leaders are confident this applies to the vast majority of staff and officers in their area, they are more circumspect about signing this off as a general statement.
- In Frontline Policing, leaders view is that most officers and staff behave with integrity and professionalism and that processes are in place to identify misconduct, and that such cases are dealt with efficiently. However, issues continue to be identified, locally and through central work on standards. Two areas have been highlighted for improvement:
  - The time misconduct cases take is too long, with officers suspended on full pay for months or even years. This sends out a very negative message to the public.
  - More support and leadership is needed for sergeants (including acting roles) and equivalent, whose role is very important as first line manager.

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- Within Met Ops, Professionalism, and Specialist Operations (SO) there is also confidence that processes are in place in terms of meeting structures, oversight, external scrutiny, communication and escalation which help identify misconduct and poor behavioural issues; and that the majority of staff behave ethically and with integrity. It is recognised that there are still incidents of misconduct but there is confidence that these are dealt with effectively. Training, and specifically on-line training is not regarded as sufficient, and not all policies are communicated well enough.
- In Corporate Services Directorate, consensus is that professionalism is high. Regular briefings take place to enable messages and staff discussions regarding behaviour, culture and expectations.
- Digital Policing responses highlight that the staff survey has shown the directorate to be generally well managed, and satisfaction amongst staff to be high, but notes a lack of clarity concerning corporate policies and procedures.

Further work and improvements required

Our Rebuilding Trust plan – published in early October 2021 – outlined the Met's immediate priorities to raise standards and improve our culture. A dedicated team has been set up to support delivery of this work led full-time at commander level. Detailed commitments, from a root and branch review of the Parliamentary and Diplomatic Protection Command to a review of all current investigations into allegations of sexual misconduct and domestic abuse against our officers and staff, are published, and our progress against them will be reported regularly.

In parallel, Baroness Casey of Blackstock was appointed to conduct an independent review of Met culture and standards. The review will include how we combat misconduct, drive up our standards for better behaviour among ranks, as well as how we can react more openly when things go wrong and improve our transparency as an organisation.

In March 2022, HMICFRS published "An inspection of the Metropolitan Police Service's counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel". They identified a number of causes of concern and made recommendations related to this governance improvement area. They found a *"lack of proactive work to gather counter-corruption intelligence"*, a *"lack of monitoring and oversight of declarable associations, business interests and gifts and hospitality"* and that *"the current professional standards operating model within the MPS is a cause of concern"*. Over the course of the next year, the MPS will address the recommendations: a plan to deliver the actions set out in the control strategy has been developed and shared with our oversight body.

A number of recommendations are related to vetting; the MPS will seek to address them by determining the vetting status of all personnel in designated posts and as soon as possible thereafter, ensure that all designated post-holders are vetted to the enhanced (management vetting) level and will provide continued assurance that designated post-holders always have the requisite vetting level. HMICFRS also recommended that the MPS should:
- ensure that all police officers and staff are made aware of the requirement to report any changes to their personal circumstances and establish a process whereby all parts of the organisation that need to know about the changes are always made aware of them.
- strengthen business interests monitoring procedures,
- facilitate the presentation and exchange of corruption-related intelligence (with effective and auditable processes), to identify officers and staff who may present a corruption risk

HMICFRS made other recommendations in respect of declarable associations (revising policy and procedures, conducting risk assessments and maintaining effective oversight of processes and registers), as well as the sufficient resourcing of the units concerned with the effective monitoring of all MPS personnel assessed as presenting a high risk of corruption.

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We will improve assurance of how we identify and manage risk, including through command assessments, and use these to improve commands where we identify that risk management is weak. The Command Assessment of Standards will need to be completed by every leader of a command unit to enhance accountability, oversight and scrutiny of standards and the professional health of units across the Met. These assessments will be scrutinised at Management Board level, and by MOPAC and Audit Panel. The rollout of the first iteration will take place in Quarter 2, 2022/23.

> **AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:**
> o   Continuing delivery of the Rebuilding Trust Plan including raising standards, culture audits and Command assessments.
> o   Enabling the delivery of Baroness Blackstock independent review and addressing findings
> o   Implementing HMICFRS recommendations in its Counter Corruption Arrangements report
> o   Strengthening Professionalism's capacity, corporate communication and reporting channels,
> o   Strengthening supervision
> o   Introducing Command Assessment of Standards across the Met

2- Ensuring openness and comprehensive stakeholder engagement

Assessment of current position and recent progress

We aim to be a trusted partner, effective in mobilising partners to keep London safe for everyone. We seek to build relationships and engage with communities across London, to prevent crime and inspire trust and confidence in policing. We have a number of structures in place which support delivery. The Crime Prevention, Inclusion and Engagement (CPIE) command holds responsibility for internal and external partnerships. These relationships build assurance that our organisation is progressing to achieve a fully inclusive culture and delivers policing with a greater focus on prevention and engaging with diverse communities. CPIE leads on our partnerships with our external corporate IAGs and community reference groups; our Staff Support Associations, and deliver the Met Outreach Recruitment Strategy to build an organisation reflective of the city it serves. We published a new Community Engagement Handbook which sets out clearly how the Met engages with the communities it serves.

The new Inclusion, Diversity and Engagement Strategy (Stride) was developed through extensive consultation and published in September 2021. An implementation plan is set on an annual basis. Governance mechanisms are in place: performance is measured through the STRIDE Delivery Board, chaired by AC Professionalism and attended by MOPAC and other external groups including IAGs, and progress is good.

We also consulted on, and published our action plan to tackle violence against women and girls which aims to increase women's confidence in the police so as to improve the reporting and investigation of crimes which disproportionately affect women and girls within London, and to intensify work with our partners and with women to improve prevention and victim care. As part of this, we organised Walk and Talk sessions on every BCUs, focused on violence against women and girls, where women join officers to help us identify areas where they don't feel safe. We also engaged with businesses in the night time economy sector to provide training given to licenced premises employees and raise awareness of tools - such as Ask for Angela - that can prevent or assist victims.

We know that Black Londoners have less confidence and less trust in the Met than white Londoners and that there remains a persistent gap. We are also aware that some police tactics impact disproportionately on the Black communities. To understand and address some of the drivers and issues, we are working

with the Mayor and MOPAC to deliver the Mayor's Action Plan – as well as additional initiatives from Deputy Commissioner Delivery Group established in November 2020. Progress is reported through the MOPAC MPS Oversight Board.

Q2) I am confident that within my area of responsibility there are clear and effective communication channels and consultation arrangements with stakeholders and service users on priorities, resourcing and policing activity.
YES 79%, PARTLY 21%, NO 0%

SUMMARY FINDINGS
- Frontline Policing reported considerable efforts on stakeholder engagement both at points of criticality, but also through business as usual (BCUs engagement plans for example. Local communities, councils, MPs, community groups and service users are engaged at two levels: strategically (IAG, reference groups) with CPIE, and at a local level (surveys, ward panels). Improving representation at Independent Advisory Groups (IAGs) and communication with under-represented groups – such as black communities - are two areas of improvement.
- Met Ops responses were positive to this statement, underlining the key roles that stakeholders play in their areas of work. There are effective channels of communication and consultation and good stakeholder mapping. MetCC is of course one of the vital interfaces with the wider public. For some pieces of work however, channels for appropriate escalation may not always be clear.
- Professionalism reported good engagement structures, linkages with key stakeholders and national bodies. However, more work is required to further improving communications with communities who have limited trust in the Police.
- In Specialist Operations all OCUs are able to demonstrate that there are clear consultation and communication channels available both within the Met, and with key external stakeholders and national bodies.
- The responses in Corporate Services and Digital Policing show good internal stakeholder engagement structures in place (from business partnering to networks in place) as well as consultative, communication and reporting arrangements. One issue raised was the limitation that technology, and in particular the Intranet, posed in terms of consultation at scale, and getting the message across when there are many concurrent initiatives.

Q3) I am satisfied that within my area of responsibility, our decision and service delivery processes engage partners closely and take account of service user needs effectively.
YES 74%, PARTLY 26%, NO 0%

SUMMARY FINDINGS
- There are good engagement processes and structures in place across Frontline Policing, to engage partners. However, there remain areas for improvement: speedier response to victims, and gaps in commissioned services or support not specifically owned by the police (e.g. mental health).
- Engagement with partners is a key necessity for units within Specialist Ops in order to function effectively. This is working well, with one area for improvement raised around better information sharing with partners, for which activity is ongoing.
- Digital Policing, Professionalism, Met Ops and Corporate Services' engagement and business partnering processes are established, but some activity is underway to get broader feedback from service users. Speed of service design (internally), and resourcing engagement (externally), are highlighted as two constraining factors.

We have a number of structures which drive relationship and progress with communities where there are also gaps in confidence (such as the LGBT+ Organisational Improvement Group and the Disability Delivery Group – both with external representation).

In the context of our current Governance Improvement Plan on Public and Partner Engagement, in the last year, we have:

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- o Established and staff the London Safety Centre, published the STRIDE strategy, with performance measured through the STRIDE Delivery Board, and embedded into the processes of CPIE.
- o Effected the rollout of Police Encounter Panels having resolved to the complexities of Data Protection and legal sharing of data. Within Stop & search, a new community engagement product "A Different View" is now utilised. As at January 2022, over 66 Community Monitoring Groups screenings of Body Worn Videos had been facilitated across 23 boroughs, in an initiative aimed at raising confidence of communities and partners.

In key areas, we have established clear partnership priorities, and developed effective operational partnerships:
- o We set up the Child Exploitation Pan London Operating Protocol in close collaboration with the Children Safeguarding Board, the NHS and London Councils. In addition to key partner briefings, over 3,000 colleagues (including response teams, parks and roads police and all youth strands) have now been provided with training and information regarding the requirements of the protocol.
- o The Met and local authorities now share a common platform to facilitate digital uploads. The London Office for Innovation and Technology, the Met and other partners are in active negotiations to fund a permanent administrator to expedite data sharing across partners (and a common hosting platform).
- o The CT Command developed national guidance on the management of families returning from conflict zones which has been shared across the London Director Social Care Network, supporting effective integration and risk management of children and vulnerable adults into the UK. We have seen the positive impact of developing relationship with key partners, the department of Homeland Security and local authority leads, in better understanding the challenges faced by these families.
- o DARA's audit on digital engagement with the public – online crime recording (October 2021, rated adequate) highlighted, amongst areas of effective practice, how the Single Online Home developed following wide consultation ensuring public accessibility and improvements met public needs, as well as the collaborative agreement between all forces sharing the SOH service hosted by the Met.
- o The London Firearms Board, chaired by the Met and attended by NCA, NFTC and Border Force has embedded the relationship between all partners. There are improved connections of upstream firearms intelligence leading to more activity. Enhanced forensic opportunities are being exploited.

Further improvements we need to make

HMICFRS published their findings from the Met's National child protection inspection assessment of progress in September 2021. Whilst they acknowledged the Met had made progress, they identified areas that need further improvement including how the force investigates online abuse and the viewing and sharing of indecent images of children. We will work to improve this over the coming year.

Positive Activity Initiatives (deployment for three or six-week periods of all our Citizens in Policing into areas of violence and low confidence) in BCUs initially took longer to set-up than planned, but will now continue apace as an essential tool to build confidence locally with communities, managed through our crime prevention and trust governance. We have established clear partnership priorities, and as one of the BCU core commitments, monthly meeting with key strategic partners such as borough Chief Executives and local community safety leads have been held. This will continue, in order to consolidate engagement. We will also increase dialogue with communities on specific issues to build trust (e.g. tactics such as Stop and Search).

A number of DARA audits also raised areas of improvement in how we work with partners including:
- o The alignment of risk management and partnership management guidance to facilitate effective risk identification and management with key partners. Risk Management Framework audit (December 21)
- o The review and update of Service Level Agreements between Met Detention and other internal stakeholders (Met Detention Delivery Framework – Capacity and Capability audit, May 21, Limited)

o The review of internal communications to ensure accurate advice is provided to appropriate officers and staff in the context of Case File Management – Disclosure (Audit follow-up review May 21, Adequate), noting that collaboration between the Met and its partners has improved through a number of actions (Co-location of Met's Head of Criminal Justice Partnership and the CPS; Analytical work into cause and impact of disclosure failures; dashboards; Rape Joint Improvement Plan to address victim attrition).

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:
o Developing communication strategy to improve our engagement with Londoners
o Driving continued implementation of Stride through a refreshed Action Plan for 2022/23 and embedding the changes effected through the Deputy Commissioner's delivery Group and Mayor's Action Plan to reduce gaps in trust and confidence
o Building on the consultation exercises we ran for the VAWG Action Plan and STRIDE
o Improve data sharing and risk management in our partnership work

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

Assessment of current position and recent progress

The Met has substantially strengthened its position in recent years by defining clear outcomes (measured and monitored via the Performance framework, and aligned with the Met Direction). Quarterly business plan progress reports are reviewed by Oversight Board, Performance Board and Performance Group and published on our website. Substantial collaborative work took place with MOPAC to develop the Mayor's new Police and Crime Plan and to now cascade the plan into the Met Business Plan. We are also working with the Greater London Authority and partners to maximise our role as an Anchor Institution, to support our capital's sustainable recovery. With these solid foundations, evidence-based insight underpins and informs actions at every level of the organisation. For example, the DARA audit on Gun Crime, Resources, Deployment and Capability (July 21, Adequate) highlights the development of the Firearms Strategy (2020-25) and its alignment with the Met, Business Plan and Met Direction as an area of effective practice.

In the context of our Governance Improvement Plan on Data Management, we launched the 'Year of Quality' in January 2022. Good progress continues to be made across the plan: Information Asset Owners (IAOs) plan approved, contract established with IAOs and Data Office and training package for IAOs completed. The Head of Data Foundations role recruitment is now underway. An MPS-wide Learning Needs Analysis for Data was completed in 2021/22.

Q4) Within my area of responsibility, we are clear about the outcomes we want to deliver towards the Met Direction, and on the economic, social and environmental benefits/ impacts of our decisions
YES 74%, PARTLY 23%, NO 3%

SUMMARY FINDINGS
- There was clarity and buy-in across Met Ops and Frontline Policing with regards to the Met Direction (in parts because it has been in place for a while), with priorities well understood and communicated – and a performance framework that cascades into decision and operational work. As with other Directorates, within Professionalism there is clear understanding of their contribution towards the strategy as well as effective channels of communication and oversight in place.

- Whilst in Specialist Ops, the statement also receives a positive response, leaders highlight that because of the national remit, there is less understanding from junior ranks of how Met Direction applies, and how OCUs deliver outcomes towards it.
- In Corporate Services and Digital Policing, most respondents consider this to be an area of strength – from the use and the clarity of the strategy, cascading to investment prioritisation, business case articulation, and defining economic / social benefits. There were views that business case processes could be simplified.
- One recurrent area of weakness raised by a number of respondents across business groups was around the implementation and tracking of environmental benefits.

The DARA audit on Benefits Realisation and Performance (Follow-up review May 21, Adequate) noted that governance had been boosted by the introduction of the PIB Level2 governance group providing assurance on business cases and business justification papers and that Benefits Handover Certificates transferring responsibility for benefits realisation and tracking were being issued at programme closure. However work is still required to develop a system to support the management and realisation of benefits for the high-risk / high-value "business as usual" projects or proposals.

Further improvements we need to make

Whilst DARA's audit on Information Management, Data Quality including Workforce Data (May 2021, Limited) noted progress in terms of:
o   Assurance on data quality and wider compliance issues obtained via key meetings and boards with defined stakeholder engagement across business groups.
o   Met insights a data tool being developed to identify crime hotspots, highlight priorities and display information quickly in dashboards and being evaluated to improve DQ reporting.
It also raised the need to improve metrics, KPIs and data reporting standards. An Advanced Analytics Strategy is in place, which will help improve strategic outcomes.

Also, in response to DARA's Environment & Sustainability audit (September 21, Adequate) decision-making template have been amended to include reference to sustainability and environmental factors, but the assessment from Met leaders is that further work is required in how the organisation implements and track these environmental benefits.

> **AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:**
> o   Progressing work on data quality and Data Management
> o   Exploring the implementation and tracking of environmental benefits further

4- Determining the interventions necessary to optimise the achievement of the intended outcomes

Assessment of current position and recent progress

The Business Plan outlines the Met's key operational priorities for policing London. It also articulates the specific initiatives and actions we intend to take, in the short and medium term, to deliver against the Met Direction. Determining the interventions is done through the enhanced business planning process using a number of channels including:
o   We have used the Force Management Statement process to assess resource, demand and capacity and capability gaps; with policing commands setting out their plans to improve effectiveness.

- o Corporate work and engagement with the Board identified a number of challenge areas that needed acceleration and focus (TRUST, CONFIDENCE and ACCOUNTABILITY; VIOLENCE AGAINST WOMEN AND GIRLS; DETECTIONS; DIGITAL AND DATA)
- o Strategic priorities for policing expressed in the Beating Crime Plan and the new Police and Crime Plan and cascaded into actions.
- o In line with last year's AGS areas of focus, a Blueprint 2029 was developed to expand Met's future thinking about the capabilities it will need long-term. This now feeds into both planning and transformational work.

In addition to the enhanced business planning, we have pursued work from the Transformation Directorate in terms of the operating models to ensure structures are fit for purpose in an evolving operating environment (both Met-wide, and at Command level, such as the implementation of Phase 3 of the Intelligence Target Operating Model in September 2021).

Further improvements we need to make

> *Q5) I am satisfied that in my area of work we have the information we need to drive decision-making, plan the interventions that will achieve our objectives, and that the processes and governance across my unit support the achievement of our intended outcomes*
> *YES 51%, PARTLY 49%, NO 0%*

SUMMARY FINDINGS
- Confidence in this area is less strong, in the main linked to data and systems.
- Frontline Policing have good processes and local governance structures in place but suggest that more analytical support could improve this further.
- Met Ops identifies good systems in place to deal with information and data, but limited feedback (on the effectiveness of its support to other parts of the Met, or from strategic boards) can hinder further insight. Specialist Ops OCUs have the information they need and work closely with partners and stakeholders (noting some gaps in core skills data).
- Corporate Services and Digital Policing leaders report that effective decision making processes are in place across all areas, supported by the business partnering model. Best practice is followed in transformation, project and change management delivery to the standards in place elsewhere in the public sector. However, the lack of speed can be a constraint. Additionally, whilst there is strong organisational commitment and improvements on data, the right data is not always available to help the organisation prioritise, but that activity is underway to improve on this.
- Professionalism's assessment is more mixed. Information can be out of date, or access can be hampered by IT systems or technology and organisational learning is at a nascent stage and needs maturing. On both fronts there have been some improvements, but more is required.

Within its Child Protection report (September 2021), HMICFRS stated that "*senior safeguarding leads show focus and oversight in improving child protection across London*", however there is still more to be done to see sustained improvements in other areas and decision-making. This includes the way in which registered sex offenders are managed, how online abuse and exploitation investigations are conducted and how digital devices are examined are of particular importance.

The Met received eleven IOPC learning recommendations as part of its review of the application of stop and search powers. Eight of the recommendations have been completed and are embedded into every day practice. Operation Coniston was rolled out in October 2021, whereby randomly selected search BWV encounters are reviewed by supervisors and officers, to identify learning and good practice as part of continuous reflective practice. Three of the recommendations are ongoing, including supervision around the use of stop and search powers: BCU lead officers scrutinise reports to identify teams and individuals where supervision is not being carried out promptly and take action to rectify the problem.

DARA have raised areas for improvement to optimise outcomes in some of the audited areas:

o TSG use and deployment of resources (Follow-up review May 21, Adequate): further work needed on the definition of expected outcomes in the delivery of TSG's key responsibilities as a pan-London unit; as well as detailed analysis on level of demand and resourcing requirements
o Framework Supporting SIAM2 Development (April 2021, Adequate): further clarity is required 1) within the MPS guidance to determine accountability for key decisions and 2) in documented Programme governance arrangements with regards to the corporate oversight and key accountabilities for decision making.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:
  o Further embedding enhanced business planning processes
  o Developing a joined-up digital and data strategy to maximise organisational capability and efficiency
  o Implementing key systems, in particular CONNECT and Command and Control, to address IT legacy issues
  o Developing the organisation data / information analytical capacity and capability

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5- Developing the entity's capacity, including the capability of its leadership and the individuals within it

Assessment of current position and recent progress

We have a strategic objective to "learn from experience, from each other, and constantly strive to improve". As reported through our Governance improvement Plan on Capability, Learning and Development, the delivery of Learning and Development transformation is progressing at pace. Mobilisation for the Learning Target Operating Model (LTOM) is on track for June 2022. The 'Go Live' date for the corporate Learning Management System (LMS) is taking place over the summer. New digital and blended training content is being rolled out. The transformation of the core investigative training (PIP2) delivered by the Crime Academy continues, transitioning from a 'one and done' face-to-face course to a blended learning development programme.

We expanded training in the Public protection area to ensure officers are better equipped:
o Training BCU public protection officers and Harmful Practice Advisors on Protection Orders, to increase their use and improve their management
o Devising pathways to enable reaccreditation for all trained officers against the Specialist Child Abuse Investigation Development Programme (SCAIDP/SAIDP). Re-accreditation for those in suitable roles has been completed.
o Implementing investigation training and working with MASH teams and Children's Social Care to enable investigators to understand the processes (MASH/CAIT referrals / strategy discussions / Local Authority Designated Officer involvement) to safeguard children at the earliest opportunity.
o Reviewing how "Abuse and Neglect of Vulnerable Adults" investigations are allocated to ensure that the officers have the relevant skills and experience. The quality of investigations is tested through the annual quality assurance assessment process.

We also addressed capacity and capability through system improvements, such as:
o Updating our crime recording systems to include mandatory considerations by investigating officers of the vulnerability of an adult victim of crime or to identify those offences where additional vulnerability may exist

- Completing the Labnet networked kiosks in BCUs to enhance officer self-service for digital downloads
- Providing better access to the Child Abuse Image Database (CAID) to Online Child Sexual Abuse and Exploitation (OCSAE) officers to improve investigation capability.
- A new national AI system went live in April 2021 which automatically sends Protection Orders obtained in Family Courts relevant to the Met – making recording more accurate, better safeguarding victims
- Implementing Image Retrieval Units across all four Specialist Crime hubs to ensure the timely retrieval of vital evidence and suspect identification, increasing positive criminal justice outcomes.

Further improvements we need to make

Within the Professionalism command, there is an Organisational Learning and Research function – which is developing an organisational learning environment within the MPS to capture and turn learning into action. The OL function has become established within CPIC, and focuses on four key areas:
- implementing the OL framework
- systemising information, knowledge and memory
- learning from high harm/risk; and
- embedding a culture of learning

In the context of our Governance Improvement Plan on Organisational Learning (OL), there are however a number of slippages on some of these strands, which CPIC attributes to pressures on its resources. This includes the timing of delivery for some of the OL supporting structures in Commands (OL hubs). The team worked with Digital Policing, and other parts of the business to develop Organisational Learning within scoped Met systems. The planned OL app was withdrawn due to cost and complexity. However, full overall implementation is still expected to be complete by Q4 2022/23. The improvement plan will therefore be carried forward to the coming year.

> **Q6) I am confident that processes to identify the skills and abilities needed in my area of responsibility are effective and that our recruitment, training and learning and development processes deliver the capability and leadership we need.**
> **YES 40%, PARTLY 49%, NO 10%**

SUMMARY FINDINGS
- This area receives the lowest levels of confidence from senior leaders. This is related in part to the current market for specialist skills – competitive and in short supply. Whilst these are externalities, Met processes (including vetting) can lack agility and exacerbate the difficulties.
- Frontline Policing, reports a mix of issues for officers: whilst the central recruitment process is recognised as effective, areas of improvement are identified with regards to training and promotion: for sergeant promotion, we are not testing some of the skill set to supervise effectively and do not seek line manager view – the focus on numbers to promote can impact on quality. Secondly, as the officer growth has decreased corporate levels of experience, training has not been reinforced and is assessed as inadequate to help address that relative inexperience.
- Although some units within Met Ops have sound recruitment and training processes, those that depend on specialist staff highlight recruitment difficulties due to length of time and salary constraints, whilst for officers, they also note that the supervisory model needs investment, as well as effective training and leadership skills.
- Although it is acknowledged within Professionalism that there are leadership and training courses available, many responses indicate that this is not sufficient. There is a perceived lack of talent management, and skills.
- Our market engagement, employment offer and processes – in terms of staff recruitment – do not attract the right pool – as noted across Corporate Services and Digital Policing.

- Unlike some other Directorates, the general view in Specialist Ops is that officers and staff have the skills and training required to work effectively. Recruitment can be an issue due to demand elsewhere in the Met, and the diversity of staff needs improving in some specialist units.

HMICFRS' Child Protection report (Sept 2021) reported that some staff within the Public Protection environment are "*under significant pressures*" with "*workloads, staff capability and supply of detectives with the right experience as contributing factors.*". HMICFRS observed that the Met is actively seeking to manage the high workloads and that investment is being made to address capacity issues. However, they cited "*it could do more to use an understanding of good practice and development needs to inform both immediate, and ongoing, staff training. The force also needs to ensure all teams involved in such work are consistent in both approach and method*".

Through their audit programme, DARA also identified areas of risk, making recommendations around:
o The centralised monitoring and oversight of training and skills for Public Protection officers with consistent recording of information and reliable data (BCU Review Programme - Domestic Abuse, Management and Deployment of Resources including the Investigations Framework; November 21, Adequate).
o A central skills matrix to facilitate a gap analysis to manage future training needs (Programme/Project Management – TD Governance; February 2022, Adequate)
o Clearly defined roles, responsibilities and accountabilities (Met Detention Delivery Framework – Capacity and Capability; May 21, Limited)
o Consistent and accurate completion of a skills database to monitor training compliance and identify skills gaps (TSG Follow up Review on the Use and Deployment of Resources; May 21, improved from Limited to Adequate).

These recommendations echo the feedback from Leaders in terms of a better corporate understanding of skills available, in order to permit a more effective management of resources, as well as targeted provision of training.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:
o Implementing the Learning Management System to provide solid foundations to our learning approach and our management of skilled resources
o Improving our understanding of workforce capabilities and better linking training to identified needs
o Working to address the experience gap through better supervision and continued leadership development

6- Managing risks and performance through robust internal control and strong public financial management

Assessment of current position and recent progress

Robust financial grip is in place and improvements continue. The Director of Finance chairs a monthly meeting with relevant directors, considering investment decisions that are due to go to Portfolio and Investment Board and the Investment advisory Meeting. The Risk and Assurance Board has sharpened its focus on strategic risks and reviews directors' response to all Limited audits. The Performance Board and Performance Group manage performance linking operational (with the Performance Framework in place) and enabling functions (reviewing resourcing of OCUs on a regular basis).

The DARA audit on Programme/Project Management and Transformation Directorate Governance (February 2022, Adequate) highlights risk management arrangements in Transformation as an area of effective practice, with key risks regularly reviewed, escalated and reported to stakeholders.

The DARA audit on Risk Management Framework assessed the Met at Risk Maturity (low) Level 3 and suggested a number of improvements that will be taken forward in the year ahead. It also highlighted areas of effective practice: the Risk Management guidance revised in January 2021 clearly outlines approach, management accountabilities, governance and process in line with best practice. It also found Management Board members are committed to effective risk management and improving risk management throughout the Met.

We have strengthened operational risk management across many functions and crime areas:
o   Embedding THRIVE+ in Frontline Policing, so as to have a consistent decision-making framework across the Met. THRIVE+ awareness training has been delivered to Street Duties tutors and is part of the new curriculum (PEQF) for all new recruits – so threat, harm and risk is fully integrated in their decision making.
o   Realigning Trident reactive resources to meet geographical and investigative demand of lethal barrel discharges and the recovery of firearms.
o   Updating our sexual risk orders (SRO) policy to improve public protection, the supervision of their applications, and risk assessment information for the courts, and to apply management more robustly through Jigsaw teams. This change has been accompanied by an extensive internal awareness campaign to all CID units and more widely.
o   Adopting Vulnerability to Radicalisation (V2R) as a defined strand of safeguarding across our Public Protection Framework, and developing force wide delivery of Prevent has been overseen by the Force Prevent Strategic Lead. In order to increase the identification of those vulnerable to radicalisation we have incorporated V2R within vulnerability factors on MERLIN (system recording details of missing persons, children and vulnerable adults) ensuring it is a consideration for officers when completing their assessment.
o   Driving performance on wanted offenders, with a focus on high harm offenders. The Violent Crime Task force (VCTF) now holds an Offender Management meeting every two weeks where all BCUs are held to account for their activity that specifically targets wanted high harm offenders.
o   In Public Order, we have appointed experienced Public Order Public Safety (POPS) Commanders as Lead Responsible Officers, building in resilience, learning and development opportunities as each has a deputy. We have improved the debrief processes to encompass learning from each event.

> **Q7) I am confident that risk management arrangements within my area of responsibility, are effective in identifying, assessing, escalating and managing risks.**
> **YES 79%, PARTLY 21%, NO 0%**

SUMMARY FINDINGS
*   In Frontline Policing, most leaders mentioned that risk forms a regular element of meeting discussions – whilst Met Ops gives a strong, positive self-assessment of its risk maturity and risk management culture. Effective risk processes across Specialist Ops OCUs include partnership sharing, including at national level, as well as reviews of organisational learning. Corporate Services identifies improving governance, good risk management (through meeting structures and risk registers). References are also made to the oversight by the Risk & Assurance Board, positive working relationship with DARA, and the constructive response to the Information Commissioners Office (ICO) recommendations. Risks are also effectively managed across Digital Policing, with processes in place for identification, management and escalation.
*   In Professionalism, arrangements are considered generally positive, but risk management could be strengthened through regular reviews and a lack of experience or training.

Q8) I am confident that we have robust assurance structures and effective internal controls within my area of responsibility including financial procedures, management systems and performance reporting.
YES 69%, PARTLY 28%, NO 0%

SUMMARY FINDINGS

- Assurance in areas of Corporate Services and Digital Policing is based on established local structures (PMO office, Health Safety and Wellbeing Board etc.), corporate boards (Risk & Assurance), embedded controls and reporting mechanisms (such as project reviews). Frontline Policing, Met Ops and Professionalism leaders also assess structures as effective with a good level of control, good support from corporate services and generally sufficient oversight. Specialist Ops report clear lines of oversight regarding financial and performance reporting.
- Leaders find the information packs produced (finance or performance) useful, but some still report challenges and more work still required, such as in terms of access to data, local performance dashboards, or in terms of enhanced analysis of financial spend that could provide more insight.
- One issue raised under this section concerns the lack of capacity to conduct regular proactive assurance activity (in this context linked to data protection or processing) which might be applicable to other areas).

Q9) I am confident that financial management within my area of responsibility is effective; that officers and staff understand and comply with financial processes (including the MOPAC Scheme of Delegation and the Met financial instructions); that our decision-making delivers value for money; and that suspected cases of fraud or financial impropriety are referred to Finance, DARA and Professional Standards.
YES 72%, PARTLY 28%, NO 0%

SUMMARY FINDINGS

- Leaders highlight effective financial processes in place in Corporate Services and Digital Policing, compliance with the scheme of delegation, regular reviews, discussions at meetings, support from Finance business partners and monthly SLT oversight. Frontline Policing also report generally good controls in place, and financial processes are discussed at SLT meetings, supported by good relationship with the central Finance team. Met Ops and Specialist Ops report confidence in the way in which financial processes are handled, and commercial services relationship. DARA audits and recommendations are acted upon, and MOPAC's scheme of delegation followed. Professionalism assesses that good processes in place to ensure requirements are met, reports of financial impropriety are investigated and there is a clear understanding of processes and oversight.
- Given much of the budget is spent on people, areas for improvement highlighted are around the resource liability management of rest days and annual leave; as well as overtime overspend in some areas.

Further improvements we need to make

In the context of our current Governance Improvement Plan on Assurance Controls, Level 1 and 2, we made progress on a number of fronts:
o   The review of Public Protection policies has taken place.
o   The Data Quality Ethics Assurance Board (DQEAB) is in place and helps BCUs in completing their Level 1 inspections. Initially focused on Public Protection, it has been expanded to include reviews of the usage of *Released under Investigation*, and *Outcome 16* (victim withdrawing support for investigation).
A number of actions will be carried forward to next year, including the embedding of Level 2 Assurance capability within CPIC – and the further deployment of a continuous improvement approach across BCUs as part of Operation Aegis (Public protection).

> **Q10) I am satisfied that data is managed robustly within my area of responsibility (both in terms of quality and compliance), and that my officers and staff know and comply with statutory obligations.**
> *YES 46%, PARTLY 46%, NO 8%*

SUMMARY FINDINGS
- Leaders highlight the significant improvements that have taken place in that area (e.g. to update data agreements, carry out Data Protection Impact Assessments, steer progress through Data Board and Data Assurance Gold Group, and to educate staff) as well as the need for more work to ensure that data management, responsibilities, and practices are understood by all.
- In Frontline Policing, leaders acknowledge there is more to do in terms of how data is used and shared. Across business groups, it is noted that Data quality entry also needs to improve, particularly ahead of the Connect implementation. More training and supervision could assist. In Specialist Ops, there is robust compliance and understanding of data responsibilities, but there are legacy challenges (in common with other parts of the Met, for example the CARMS (Computer Aided Resource Management) replacement delay in Public Order, or more widely the issue of data retention).
- Corporate Services and Digital Policing, in addition to the dedicated Data Office capability, highlight local governance and practices in place to manage the use and quality of data.

The DARA audit on Information Management – Data Quality including Workforce Data (May 2021, Limited) highlights areas for improvement consistent with some senior leaders' responses above:
- The importance of data quality is not clearly understood for a large number of officers and staff, and there is a need to educate, change behaviours and instil the principle of "right first time" and personal responsibility for data to build good data foundations.
- Assurance over data resource is intensive and relies on monthly downloads of data that cannot be re-run once data quality amendments are made, leading to mistrust in the data.
- There is a need to improve metrics, KPIs and data reporting standards. An Advanced Analytics Strategy is in place, which will help improve strategic outcomes.

In March 2022, HMICFRS published their report entitled "An inspection of the Metropolitan Police Service's counter-corruption arrangements and other matters related to the Daniel Morgan Independent Panel". Two recommendations to this governance improvement area whereby an improved system of digital device management must be adopted with clear expectations for compliance.

The DARA audit on the Framework Supporting SIAM2 Development (Adequate) reinforced the need to follow MOPAC Contract Regulations in all cases, i.e. formal approval for route to market.

The DARA follow-up review on Financial Assurance Programme – Police Overtime (May 21) improved from Limited to Adequate. It saw a number of improvements, such as the Monthly Gold Group and an action plan created to deal with issues and monitor progress; the updated CARMS policy; Frontline OCUs overtime action plans focusing on areas requiring closer scrutiny; and the monthly reports on budget position provided to OCUs. However it also highlighted the need for:
- a clear and consistent strategic approach to policy refresh in key areas taking account of changes resulting from the move to PSOP
- Clarity and consistency within systems to monitor negative time-off and/or unelected overtime
- A System to allow consistency of interpretation within individual OCU action plans, and to ensure sufficient resourcing is in place to implement and monitor them and
- A continued review of police overtime risk profile to allow early identification of emerging risks and facilitate prompt mitigating actions.

AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:
- Finalising the review of corporate Policies

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

Assessment of current position and recent progress

Q11) I am confident my unit is implementing good practice in terms of transparency, reporting and accountability, providing assurance to our SLT, to Management Board and to stakeholders that our actions are effective, and that our intended outcomes are being achieved.
YES 85%, PARTLY 15%, NO 0%

SUMMARY FINDINGS
- Frontline Policing and Met Ops report processes are in place, through local and central governance (such as FLEX meetings, as well as national, for example in the case of Specialist Ops) providing a good grip and supporting a strong reporting culture. A number of recent improvements are highlighted by leaders, such as the development of local performance frameworks and improvement plans.
- Corporate Services report good oversight provided at various levels (internal boards, PIB, MOPAC). As for Digital Policing, a structure of governance and processes exists to monitor performance and outcomes. Key performance data and information is published on the internet. Reporting for significant issues to management board is in place (e.g. critical IT issues).
- Two areas of future improvements are noted: the lack of data in some areas of service provision, as well as a lack of clarity as to how organisational learning is embedded so it is as effective as we might want

Q12) I am satisfied that audit and inspection reviews in my area of responsibility, whether from HMICFRS, DARA or external auditors, are constructively supported and that recommendations are effectively implemented.
YES 82%, PARTLY 18%, NO 0%

SUMMARY FINDINGS
- Frontline Policing, Met Ops, Specialist Operations and Corporate Services leaders find audits and inspection are welcomed and well supported. There is good – and improving - engagement from teams. Recommendations are followed through and action plans acted upon. Actions regularly reviewed at relevant SLT and boards meetings. This also relates to Professionalism in terms of other inspecting bodies such as IOPC and coronial reports.
- Frontline suggests that more account needs to be taken of the impact of recommendations on resources and their implications / linkages across other areas – which ought to be a consideration for the auditor and at corporate level.
- Digital Policing raises an IT capability gap within the internal audit function that would help take account of Met systems design and enable the development of a stronger set of risk controls.

The MPS carries out some in-house assurance activity to ensure that policy, process and legislative requirements are being met in distinct areas such as through Continuous Policing Improvement Command (CPIC), Met Detention, Met Intel and Forensics.

We also worked to raise commercial awareness through a series of sessions (around procurement and assurance practices in particular) held in 2021 with interactive presentations provided by the Directors of Finance and Commercial Services. These are part of a wider developing approach to Corporate Services

working closely with business groups to continually improve the benefits and requirements for audit and assurance processes.

In terms of HMICFRS inspections, all recommendations and Areas for Improvement (AFI) emanating from HMICFRS reports are collated onto a central tracker. Each report is assigned a Met lead (based on who was the lead during the inspection or, if a thematic report for which the MPS was not involved in, the most appropriate senior lead) and Strategy and Governance prepare an initial action plan for the Met Lead to review. They then assign recommendation or AFI owners (named individuals) and detail the key actions that will be taken to address the recommendation or AFI. The action plan is shared with MOPAC within a set timeframe. Included within the action plan is the governance route; progress against each recommendation or AFI is through this governance route. Recommendation / AFI owners provide quarterly updates and the central tracker is updated along with HMICFRS's Monitoring Portal.

We have increased levels of transparency, for example by [implementing the Stride commitment to provide our responses to key inclusion, diversity and engagement recommendations](#).

For internal audit, high risk actions are tracked by Strategy and Governance and reported to Risk and assurance Board and Audit panel. Outstanding audit actions are reviewed at Met Ops COG and FLP risk board and outstanding actions for each area are sent to the relevant senior leader on a quarterly basis. Strengthening the pace of implementation of DARA internal audit recommendations was an objective in last year's AGS. Over the past year, the number of outstanding actions has decreased, complemented with an organisational drive to tackle any older actions.

Further improvements we need to make

The DARA audit on BCU Review Programme (Domestic Abuse, Management and Deployment of Resources incl. Investigations Framework) from November 21 rated the area as Adequate but noted the need for clarification of governance arrangements, particularly around remits, responsibilities and reporting lines, and this will be followed-up.

Finally, we have initiated work on an Open Data Strategy, which will broaden what Londoners and our partners can access directly. This is expected to be published in 2022/23.

> **AREAS IN WHICH WE WILL PURSUE IMPROVEMENT IN 2022/23:**
> o Developing an Open Data Strategy and working to make more information available
> o Implementing the Organisational Learning model and a clear framework on how learning is shared organisationally

Governance Improvement Plans 2022/23

Evidence from our 2021/22 review of the Met's internal control environment suggests that we made progress against our governance improvement plans but we acknowledge more is required, as highlighted in each section under "Areas in which we will pursue improvement in 2022/23". Between now and the final version of the AGS, taking into account feedback from Risk and Assurance Board, DARA, Audit Panel and our external auditors, we will work with commands to develop a governance improvement plan for 22/23.

Declaration

We propose over the coming year to take steps to address the matters raised in this document to further enhance our governance arrangements, focusing most effort in the highlighted areas. We are satisfied that these steps will ensure that Met governance processes will remain effective in a changing environment. We will continue to monitor their implementation and operation, including through risk management and assurance processes.

Stephen House   Robin Wilkinson
Acting Commissioner of Police of the Metropolis   Chief of Corporate Services

Appendix: background and governance framework.

Scope of responsibilities

The Commissioner of Police of the Metropolis is responsible for maintaining the Queen's peace and has direction and control over officers and staff operating within the Metropolitan Police Service. The Commissioner is responsible for the overall governance of the Met, and so for establishing and maintaining appropriate governance arrangements and risk management processes, and for ensuring that there is a sound system of internal control which facilitates the effective exercise of these functions. The Commissioner is required to appoint a professionally qualified Chief Financial Officer (CFO) for the Met. Under the Police Reform and Social Responsibility Act 2011 the CFO has a personal fiduciary duty for the proper financial administration of the Met. As an independent legal entity or corporation sole, the Commissioner is also required to produce an Annual Governance Statement.

Met objectives and operating environment

The Met's mission is to keep London safe for everyone. The Deputy Mayor for Policing and Crime holds the Met to account against the Mayor's Police and Crime Plan. The Met sets out how these priorities are delivered in partnership with stakeholders, through the Met Direction – its strategy to 2025 - and through its Business Plan and a quarterly performance monitoring process. The Mayor's Office for Policing and Crime (MOPAC) holds the Commissioner to account for efficient and effective policing, management of resources and expenditure.

The Met Direction set out three operational priorities:
- To focus on what matters most to Londoners;
- To mobilise partners and the public; and
- To achieve the best outcomes in the pursuit of justice and in support of victims.

Supporting this, four enabling priorities set out how the organisation aims to develop its internal capabilities to ensure it is operationally effective and efficient:
- To seize the opportunities of data and digital tech to become a world leader in policing;
- To care for each other, work as a team, and be an attractive place to work;
- To learn from experience, from others, and constantly strive to improve; and
- To be recognised as a responsible, exemplary and ethical organisation.

The Met priorities are delivered through a workforce of over 46,374, including 33,566 police officers, 1,848 MSC, 9,807 staff and 1,152 PCSOs organised in four operational Business Groups: Frontline Policing, Met Operations, Specialist Operations and Professionalism. In addition Corporate Services enables the Met through strategy and governance, people, transformation, finance, commercial services, property, legal, and media and communication. Digital Policing supports the Met information, communications and technology needs.
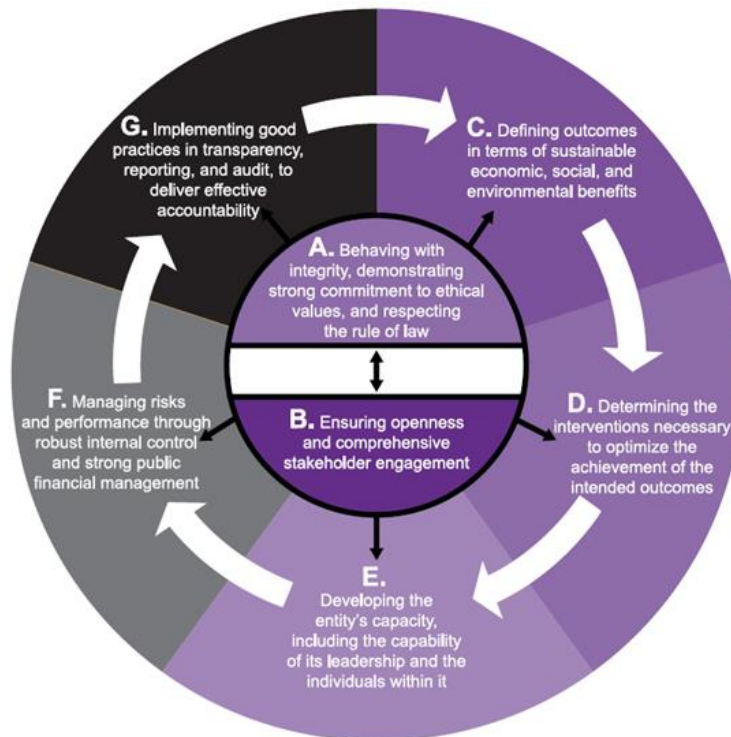
The Governance Framework

The Met has developed its governance model in accordance with the CIPFA/ International Federation of Accountants (IFAC) International Framework for Good Governance in the Public Sector (July 2014) and subsequent CIPFA/SOLACE Delivering Good Governance in Local Government Framework (April 2016) and Guidance for Policing Bodies in England and Wales (July 2016). This AGS explains how the

Commissioner of Police of the Metropolis has complied with the Code for the financial year 2020/21 and meets the requirements of section 6 of the Accounts and Audit Regulations (England and Wales) 2015 in relation to the publication of a statement on internal control. In adopting this framework the Met accepts that:

- Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.
- The fundamental function of good governance in the public sector is to ensure that entities achieve their intended outcomes while acting in the public interest at all times.

In developing this AGS, the CIPFA principles have guided the structure – the seven elements are used to structure this document.

The Met is statutorily responsible for conducting, at least annually, a review of the effectiveness of its system of internal control and so, of its governance framework and compliance with its Code. This takes place between January and May when governance areas are explored with senior leaders and evidence is analysed from a broad body of relevant sources. This includes: Senior Leaders Assessments of Internal Control; Internal and External Audit and Inspection including opinion; and Risk and Assurance activity. In addition this review of the Met's internal control environment has been informed by our Corporate Risk Register which details key business risks and controls. We have considered audit and inspection including by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), our external auditor Grant Thornton LLP, and our internal auditor the Directorate of Audit Risk and Assurance (DARA).

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