

MOPACMAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL

5 July 2021

MPS Annual Governance Statement

Report by the Director of Strategy and Governance

Report Summary

Overall Summary of the Purpose of the Report

The Annual Governance Statement is a statutory requirement and is included every year with our accounts. To strengthen governance and processes, a governance improvement plan is developed in the areas identified as requiring improvement. Progress updates on the plan are then tabled at Audit Panel on a quarterly basis.

Key Considerations for the Panel

Our internal control review (January 2021) and Annual Governance Statement assessed the robustness of governance controls across the framework and progress against all improvement areas. A final draft Annual Governance Statement (AGS) 2020-21 is attached which highlights progress made last year against our governance improvement areas. It also highlights areas where there remain issues, as well as some emerging areas.

This year we have worked to make the document more accessible to help us increase its reach across the organisation and drive improvement through the Met.

Interdependencies/Cross Cutting Issues

- The Met AGS should be considered alongside MOPAC's, DARA's annual report and our external auditors VFM report.
- The Corporate Risk Register refresh identified operational and structural risks. These sometimes identify governance risks also in the AGS and where controls will be strengthened through the Governance improvement Plans.

Recommendations

The Audit Panel is recommended to:

- a. Agree the Annual Governance Statement, (noting the full 2020-21 progress against the governance improvement areas was tabled at the Panel's previous meeting)
- b. Agree the governance improvement areas for 2020/21 onwards

1. Supporting Information

- 1.1 The Met, as a corporation sole, is statutorily responsible for conducting an annual review of the effectiveness of its system of internal control and for publishing an Annual Governance Statement. The AGS reports publicly on identified key control areas and aims to provide assurance that the Met is monitoring and managing governance arrangements effectively.
- 1.2 The AGS reflects on current governance controls and outlines improvements in the near to medium term. Our evidence is drawn from a substantial body of material including identified progress against governance improvement areas, a cross-organisational assessment provided this year by 69 senior leaders' Statements of Internal Control review; HMICFRS, DARA and Grant Thornton audit and inspection; the corporate risk register; and the Met business plan. The 69 respondents cover the full breadth of the business groups and all major commands or departments at Commander and Director level. Feedback from DARA was received and built upon to further improve the document.
- 1.3 Having reviewed progress on each of 2020/21 Governance Improvement Plans, the Risk and Assurance Board has agreed to keep focus on four: Capability, Learning and Development; Assurance controls, Level 2 and 1 assurance; Data Management; and Organisational Learning. We have considerable ambitions in each of these areas, so it is important to get governance and controls right. A further two (Public and Partner Engagement) are also being continued but merged to better reflect the articulation of the Met Direction and emphasise our work on trust and prevention. Informed by the Risk register refresh, the Board also agreed to reframe the "compliance" Governance Improvement Plan into a plan that encompasses our push to deliver consistently high levels of competence and standards of professionalism.
- 1.6 Following agreement of the Audit Panel, Governance Improvement Plan Leads will be asked to set out actions to be taken forward next year to ensure that the Met improves controls in the areas picked up in the AGS. Quarterly updates will be tabled at Audit Panel.

2. Equality and Diversity Impact

The model of corporate governance used by the Met is based on the principles of openness; integrity; accountability and equality. The development of the corporate governance framework promotes fair decision making, and helps mitigate potential negative impacts in the way the Met operates.

3. Financial Implications

There are no financial implications from the report itself. There will be some costs associated with the improvements identified by the relevant unit or business group: it falls on these units or business groups to ensure the improvements they are putting forward have a corresponding identified budget. Any funding required over and above these existing budgets would be subject to the normal MOPAC/Met governance approval and planning processes.

4. Legal Implications

- 4.1 The Mayor's Office for Policing and Crime (MOPAC) and the Commissioner of Police of the Metropolis (the Commissioner) are relevant bodies under Schedule 2 of the Audit Commission Act 1998 for the purpose of the Accounts being subject to audit. Both are under a statutory duty to approve an Annual Governance Statement (AGS) that has been prepared in accordance with proper practices in relation to internal control through members of the body meeting or as a whole or by a committee, under regulation 6 of the Accounts & Audit (England & Wales) Regulations 2015.
- 4.2 In order that MOPAC and the Commissioner can discharge the statutory duty referred to above, the Met provides its certification to MOPAC by submitting an Annual Governance Statement (AGS), as recommended by CIPFA / SOLACE guidance "Delivering Good Governance in Local Government: Framework (2016)" ("The Framework") and CIPFA Guidance Notes for Police Bodies in England and Wales (2016)" ("The Guidance"), which demonstrates how aspects of governance have been implemented within the police force.
- 4.3 The corporate governance framework provides the supporting information which evidences that the Met has robust systems in place to demonstrate it is adhering to the strategic direction set by the Commissioner, and is delivering good governance through the delivery of many operational and financial aspects within a delegated framework, in accordance with Guidance and best practice.

5. Risk Implications

The report aims to lower structural risks to the organisation by ensuring robust governance frameworks or action plans are put in place in the areas for improvement it identifies. Progress is monitored quarterly and aligned with corporate risk processes. Compliance with the governance framework will also assist in raising standards, reduce risk of legal challenge and build public confidence by ensuring the Met operates in a transparent manner.

6. Contact Details

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7. Appendices and Background Papers

Appendix 1: 2020-21 draft Met Annual Governance Statement

DRAFT Annual Governance Statement 2020/21

Commissioner of Police of the Metropolis

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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. These have been informed by the work of senior officers and staff 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, taking account of the opinions of the Met's internal and external auditors. The DARA audit opinion will be issued later this summer.

Covid-19: governance and internal controls

Over the past year, the Met has played a key role in policing the lockdown rules, whilst continuing to provide a resilient service, preventing and investigating crime throughout. As part of the Strategic Coordinating Group, we worked with our partners in the capital to ensure a coordinated system response to the pandemic and contingency plans. A DAC-led Covid-19 Gold group centrally coordinated activity, providing guidance (such as on risk assessments, PPE procurement and Covid-secure workplaces) and maintaining a risk register to put in place the right controls and mitigate impacts of the risks. The Resilience Cell informed senior leaders about demand, performance and absence. A bespoke Covid-19 Performance Monitoring Dashboard was put in place, available to leaders and workforce across the Met, and helping the Gold and Silver Crisis Command teams to understand the impact of Covid-19 on specific crime types (such as domestic abuse), enforcement and workforce abstractions. This operational view enabled control measures to be put in place in relation to moments of high demand, and flex resources accordingly.

Internally, we reviewed and updated all commands' and departments' resilience and continuity plans in the first few weeks. We put in place measures to maximise the safety of our workforce, particularly officers and staff whose role meant they had to remain physically on the frontline, and ensure the business continuity of our operations. We rapidly implemented a number of initiatives to support the workforce during the pandemic, building on agile ways of working – and our earlier technology roll-outs-, implementing new policies, and introducing new safety measures. Our focus on wellbeing, communication and resilience was endorsed by a staff survey (receiving over 20,500 responses) showing officers and staff engagement had increased to 65 per cent - and a recognition that teams had adapted well to the changes in work conditions caused by the pandemic.

Externally, the policing of the regulations in place (including unlawful public events, and public order situations) created significant demand and we flexed our response to deal with these effectively. As the restrictions changed, our approach was been guided by a "4E" approach: engage, explain, encourage and where necessary enforce.

The easing of lockdown restrictions will take place in five separate phases over to the summer. Our "easing of lockdown" plan is based on having scaled up resource levels and activity to meet each phase. Each day will be assessed as we do now as a Red, Amber or Green day, and the levels of resources and co-ordination will be commensurate with the grading of the day. On red days our command structure and co-ordination will be similar to the August Bank Holiday weekend structure. Each BCU has completed preparedness in relation to schools, open spaces, shopping centres, hospitality and entertainment areas or venues. A bespoke plan for violence will fit into the wider structures, with the VCTF, the Roads and Transport Policing Command, Territorial Support Group and Specialist Crime playing a full role as lockdown eases. In addition, 'ease of restrictions' plans have been put in place in two key areas: Violence Suppression Activity to prevent escalation and a Public Order Escalation Plan to be activated for incidents above the capacity and capability of local BCUs to resolve.

Statement of internal control

The Met Statement of Internal Control surveyed 100 most senior leaders across all Business Groups. The response was 69%, a 7 percentage point increase on the 2019/20 survey. The 2020/21 survey was redefined to

better align it along the seven CIPFA Governance Principles structure. The findings have been analysed and, across all questions, about 79% of respondents were confident that - within their area of control – the Met was fully compliant within the headlined governance principles. In a number of areas where respondents identified substantial improvements over the past 12 months:

- The rollout of Police Apprentice recruitment, with the first intake of Policing Education Qualifications Framework (PEQF) apprentice Constables;
- Leaders have observed their staff working professionally and to a high standard, though the pandemic;
- There is effective engagement and communication with stakeholders;
- That in most cases, they note clear communication within the Met, with strong governance arrangements.

The areas where Met Leaders identify the need for further action are broadly around:

- Data: quality; access to data; data analysis; relevant and timely data - but with respondents noting good progress in the FLEX meetings and local information packs provided to Basic Command Units (BCUs).
- Skills and capabilities and Capacity: staff development; skills and training opportunities – including leadership skills; police staff recruitment and length of on-boarding (external and posting panels).

The strengthening of controls and processes in these two areas will be taken forward through the Governance Improvement Plans.

2020/21 review of Met governance

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

Senior Leadership assessment

Statement of Internal Control on "confidence that officers and staff in my area of responsibility behave with integrity, comply with laws, regulations and policies, and behave ethically"

"I have a mature and experienced team who pride themselves on their professional approach" (HR Policy & Reward)

"Good line management arrangements are in place" (Vetting)

"...a lack of experienced staff and volume means the reassurance is not always there" (Public Protection)

93%, Yes

7%, Partly

Senior Leaders' level of assurance on this question was overwhelmingly positive, suggesting that this was an area of high confidence. The majority of positive comments received to support these scores include: the existence of strong meeting and reporting structures; confidence due to low complaints numbers; and feedback received through the Met staff survey. The remainder included repeated themes of the lack of frontline supervision; and more generally, those who responded 'partly' acknowledge that overall, whilst there is compliance, the embedded processes were not yet at the standard to support a fully compliant return.

Improvements in 2020/21

Local Scrutiny Panels have been implemented across all BCUs, whereby out of court disposals decisions are examined with partners to ensure they are proportionate and appropriate for the child involved and the offence committed. Due to the pandemic, a remote approach was adopted and received positive feedback from partner agencies, namely that this is a preferred format enabling more frequent partnership attendance and is more efficient.

The Practice Requiring Improvement approach was implemented across the organisation. This encourages managers to look for opportunities of learning where behaviours of concern are identified, mirroring our priority of moving from blame towards learning. Our timeliness to deal with misconduct cases has reduced when compared to the baseline, and could in part, be attributable to the above change in approach.

Met Detention reviewed older Released under Investigation (RUI) stock from 2017-2019, finding outcomes and updating/closing the corresponding custody records. Each closed record has ensured Police National Computer records (PNC) and biometrics retention/destruction are updated as appropriate. Safeguard mechanisms have been implemented to prevent a future stock build-up (such as an electronic form for Officers in Charge (OICs) to send their results to custody suites directly, supported with guidance on the intranet and individual e-mails to every RUI OIC). RUI Custody records stock from September has reduced by almost 51% to 26,217 in July 2020.

We have introduced a new trust indicator to Corporate Risk Management to provide Board members with a more multi-dimensional picture of trust and legitimacy in order to contribute to our vision for the Met to be

the most trusted police service in the world. This will be developed further over the coming year to ensure we strike the right balance of ethical and effective policing.

An updated Met Whistleblowing Policy has been developed for consultation and there is now an established mechanism for regular reporting of fraud cases between the Directorate of Professional Standards and DARA. Clear guidance on reporting mechanisms and recovery of fraud losses is required, and the fraud risk assessment needs to be reviewed and updated to reflect new and current threats.

2020/21 Governance Improvement Plan 7 on Compliance

The focus of the improvement plan was predominately addressing vetting backlogs. Significant progress was made on vetting renewals though the year, with only 430 which remain outstanding (from an initial 17,000) and these are now subject to management interventions. The new IT system has a vetting portal and vetting sponsors have been trained in its use. Testing of the new system identified some issues, which were addressed with roll out planned for early summer 2021 (a bit later than planned). A DARA follow-up report was completed in November 2020 and our assurance rating improved from 'Limited' to 'Adequate' (with 10 of the total 13 recommendations having been fully completed).

We assess the need to continue progress on this area whilst framing the plan more widely to competence and standards of professionalism. This should aim to address:

- Confidence with regards to supervision.
- Awareness of professional and operational standards.
- Development of an ethical framework.
- Strengthening of operational decision-making and performance monitoring at command levels.
- Improvement of consistency and management of Disclosure.
- Strengthening the pace of implementation of DARA internal audit recommendations.
- Supporting the implementation of the new Anti-Corruption Strategy

Assessment = controls require further improvement

Proposed areas of focus for 2021/22

- Raise professional standards awareness across the organisation
- New vetting system implementation
- Following the fraud risk assessment (DARA), need to focus on wider roll out and local management ownership of fraud risks.
- Support the implementation of the Anti-Corruption Strategy
- Scope a new model of public complaint handling across the Met, with a focus on early resolution
- Develop an Open Data Strategy, broadening what Londoners and our partners can access directly

B) Ensuring openness and comprehensive stakeholder engagement

Senior Leadership assessment

Statement of Internal Control on "confidence that there are clear and effective communication channels and consultation arrangements with stakeholders and service users on priorities, resourcing and policing activity."

"Improvement - providing more time to enable more stakeholder feedback ahead of new policy development." (HR)

"...with the existing engagement and that of MOPAC I feel that this is an area of strength" (Professional Standards)

"...improve the mechanisms for public scrutiny and community representation with a greater emphasis on virtual engagement" (Public Protection)

"...priorities can appear to be confused and the current tasking process is not designed to take in to account organisational priorities" (Met Commander)



The overwhelming view indicated that good communication exists with stakeholders and there has been an improvement in feedback from stakeholders over the last year. The common themes highlighted there is room for further internal improvement. Clear strategies are in place however the effectiveness could be enhanced by improving representation amongst stakeholders further by way of virtual engagement. Additionally, whilst sufficient governance exists, there could be more improvement if there was clearer delivery accountability and alignment of priorities which at times can affect tasking (a review of tasking is being undertaken).

Statement of Internal Control on "satisfaction that our decision and service delivery processes engage partners closely and take account of service user needs effectively".

"...An area for improvement would be broader customer surveys on existing services" (HR)

"...we have strong processes for decision making and service restoration in the event of faults" (Digital Policing)

"There are clear and transparent mechanisms for service users and 'customers' to provide feedback at an operational, tactical and strategic level" (Specialist Firearms Command)

"Still some tension between corporate and local priorities as identified by BCU stakeholders. Examples such as vehicle crime and burglary dwelling" (Frontline)



Generally it was noted that good engagement arrangements are in place in most directorates. Noteworthy practice was highlighted within Strategy & Governance, identifying strong engagement at MOPAC, local and central government levels and in Legal Services actively involved in Gold Groups and providing legal expertise to Management Board. Engagement with partners was assessed as positive but slow to react on feedback. Again differences between corporate and local priorities, and those of our partners can cause some issues with service delivery. A number of respondents noted the good engagement and relationships in place with MOPAC.

Improvements in 2020/21

Counter Terrorism Policing Headquarters have delivered national guidance on the production of Counter Terrorism Local Profiles agreed by the London Prevent Board. The profiles support and drive the prevent delivery plans that mitigate local threats, by providing clear guidance. Also, in collaboration with government partners and Local Authorities, we have identified gaps in service and actions have been undertaken to ensure that the NHS and other agencies are engaged, working collaboratively to mitigate risk and ensure the framework for returnees is implemented successfully.

We are engaged with the London multi-agency risk assessment conferences (MARAC) Coordinators Forum to share best practice, discuss challenges and explore innovation in the MARAC field and ensure that at the heart of each meeting, the survivor's voice is clear and action plans reflect this. A positive improvement is training is now in place to equip MARAC Chairs with the essential skills needed to implement and sustain an effective MARAC, to ensure that all appropriate agencies are engaged, identify high-risk victims, produce robust action plans, build transferable skills and apply them to other areas of public protection, such as multi-agency public protection arrangements (MAPPA) and child protection.

Positive Activity Initiatives (PAI) took place at two pilot sites with the aim to maximise engagement and visibility in small residential areas suffering from higher levels of violence and low confidence in the police. Although it is acknowledged that various other factors can impact confidence, our pulse survey indicates PAI has increased confidence levels particularly in one site which conducted targeted weekly themed activity. This work is part of the Crime Prevention Strategy, using multi-business group approaches to embed a 'prevention-first' view across the organisation.

We are committed to increasing the levels of confidence in policing from those communities in London which have lower level of trust – such as Black communities, whom are further affected by the impact of using force, stop and search and the events of last year. Alongside a refreshed STRIDE strategy, and the Mayor's Action Plan – inclusion, equality and diversity initiatives are underway/planned across the organisation – with specific milestones captured within the Met Business Plan. Aspects are being driven by the newly established Deputy Commissioner's Delivery Group, which has developed a significant work plan to address trust and confidence issues in London's Black communities and to improve the sense of support and inclusion for Black colleagues. It has been captured at the corporate risk level: failure to engage effectively to address appropriate priorities and manage community expectations will have negative impact on public confidence and policing legitimacy.

2020/21 Governance Improvement Plan 2 on Public and Local Engagement

The Crime Prevention and Confidence Board, Delivery group and working groups across the organisation are now all established, and have been working to implement, amongst other things, Positive Activity Initiatives (PAI) in two key challenged areas of London (addressing recommendation from HMICFRS inspection). The refresh of the Diversity & Inclusion Strategy (2021-2024) has commenced, a complementary delivery plan and performance framework is in development. The Deputy Commissioner's Delivery Group was established in December 2020 to consolidate oversight, and strengthen our initiatives to increase diversity and engagement with Black communities in London, and monitor the implementation of the Mayor's Action Plan.

A 'Use of Force Strategic Oversight Group' was formed in June 2020. Operation Minorca built into the CPIE delivery model – current examples of activity include the response to Covid-19; Public Order Policing response and high profile critical incidents. The Roll out of 'Police Encounter' scrutiny groups across the Met commencing April 2021.

The vision paper for the London Safety Centre (formerly Safety Mobilisation Centre) has been agreed setting out the strategic direction, and ensuring plans meet the robust governance requirements to meet our ambitions in this area.. A Crime Prevention working group established and meeting quarterly to assess what crime prevention activities are being used across all commands, share best practice and develop new tactics.

The updated Blue Light & Safety Partnership has been refreshed to better reflect the input of local health authorities, Local Authorities and other government bodies – establishing clear partnership priorities. Other blue light collaborative work includes first aid training to support the Westminster Nights initiative – with volunteers providing pastoral care to assist potentially vulnerable people to get home after a night out in London.

Both Governance Improvement Plans align closely in their delivery of the Met vision – to be the most trusted police service in the world – and the Met Direction pillar to mobilise communities and partners. We will pursue delivery, and merge the two plans in 2021/22 to ensure continued progress and consistency of approach.

Assessment = controls require further improvement

Proposed areas of focus for 2021/22

- 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 progress Deputy Commissioner’s Delivery Group plan
- Restart and expand youth engagement / diversion/ intervention programmes paused due to the pandemic
- Delivery and implementation of a refreshed Inclusion, Diversity and Equality Strategy (STRIDE)
- Strengthen and develop the London Safety Centre, building on the agreed vision paper
- Roll out ‘Police Encounter’ scrutiny groups across London from April 2021
- Ensure strategic alignment of new Mayoral, corporate and local priorities and performance information, and clarity to staff and officers

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

Senior Leadership assessment

Statement of Internal Control on “clarity, within my area of responsibility, about the outcomes we want to deliver towards the Met Direction, and on the economic, social and environmental benefits/impacts of our decisions”.

“It is very clear what the priorities are and how they link to the Met Direction” (BCU Commander)

“...environmental issues are considered as part of the design for building refurb and facilities management activities” (Property Services)

“...environmental impact not often considered” (BCU Commander)

81%, Yes

19%, Partly

There is consensus around a good understanding of, and delivery against, the Met Direction and a number of O/BCUs have set local aspirations against the Met Direction in addition to the Performance Framework.

Specifically relating to environmental impact, Property Services Directorate (PSD) have identified their role as incorporating environmental issues to building plans as a key strength, however in contrast to the comments by PSD, a number of other respondents have suggested that environment impacts/benefits were either not considered, or that there are areas where more needs to be done. This was also reflected as an area where better objectives and targets may need to be set. One further specific comment was concerned with how the Met could better explain the use of certain tactics, such as Stop and Search, to the wider community, which would minimise any detrimental impact on trust.

Improvements in 2020/21

The Met are represented at Joint Money Laundering Intelligence Taskforce operations meetings chaired by the National Crime Agency. The forum allows law enforcement investigators to present the case to partners from the financial services sector thus enabling them to provide enhanced context of the investigations. In turn, representatives from the financial sector are better able to understand how best to focus their resources on obtaining meaningful and actionable intelligence.

The role of the Youth Offending Team Police Officer has been redrafted in collaboration with other forces at a national level, with the aim to provide greater consistency across forces and clear definition of outcomes (draft awaits final approval by Youth Justice Board).

The new Anti-Social Behaviour Early Intervention scheme (ASBEIS) enables a partnership approach to reducing crime/ASB through early identification of offenders, engagement and intervention prior to any enforcement. Police share offender data with partners included in the data sharing agreement which allows a joined up approach to problem solving. The scheme also allows us to target behaviours of individuals who are committing crime without the necessity of proving the criminal offence such as violence.

A successful proof of concept to digitalise finger-mark images has been delivered, and evidences a reduction in end-to-end submission times, enhanced quality of images and modernises the process to ensure quicker results to investigators. It also has a positive environmental impact reducing the despatch service footprint and reduces paper options currently in use. In addition, Mobile Drugs Analytical devices were purchased and training delivered to a small cohort of officers. The devices enable more efficient and effective Test Purchase Operations, and a 2-hour reduction in officer travelling time to the lab for analysis, increasing officer proactivity on drugs / violence.

We have reviewed and updated the organisation's Environmental Management System (EMS) and procedures are now aligned to ISO standards. Through oversight, this ensures that all environmental aspects and impacts are appropriately identified, managed and monitored through our environment and sustainability governance arrangements. [DARA Corporate Social Responsibility]

The role of the Resilience Committee has been established, a corporate Business Continuity Strategy has been developed and there is improved management reporting and identification of Business Continuity and Disaster Recovery arrangements for both operational and IT systems- raising the profile of Business Continuity throughout the Met. [DARA Restricted Report Business Continuity and Disaster Recovery Follow Up]

Assessment = controls are established

Proposed areas of focus for 2021/22

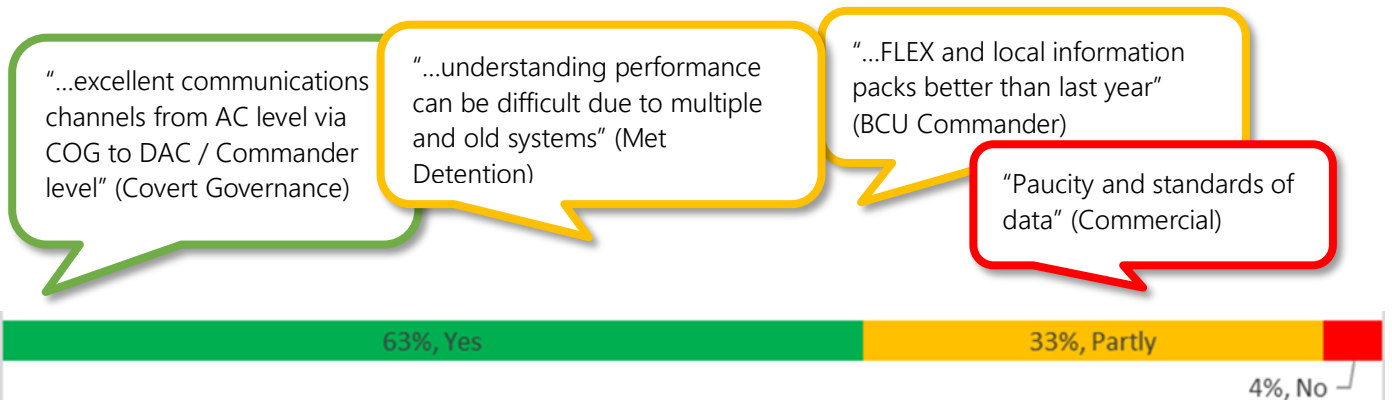
- Strengthen mental health support including officers' access to dedicated mental health professionals for advice to help ensure the safety of people and resilience of the workforce post pandemic.

- Embed sustainability considerations in business cases and procurement (DARA) and improve internal communication of environment impacts/benefits
- 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

D) Determining the interventions necessary to optimise the achievement of the intended outcomes

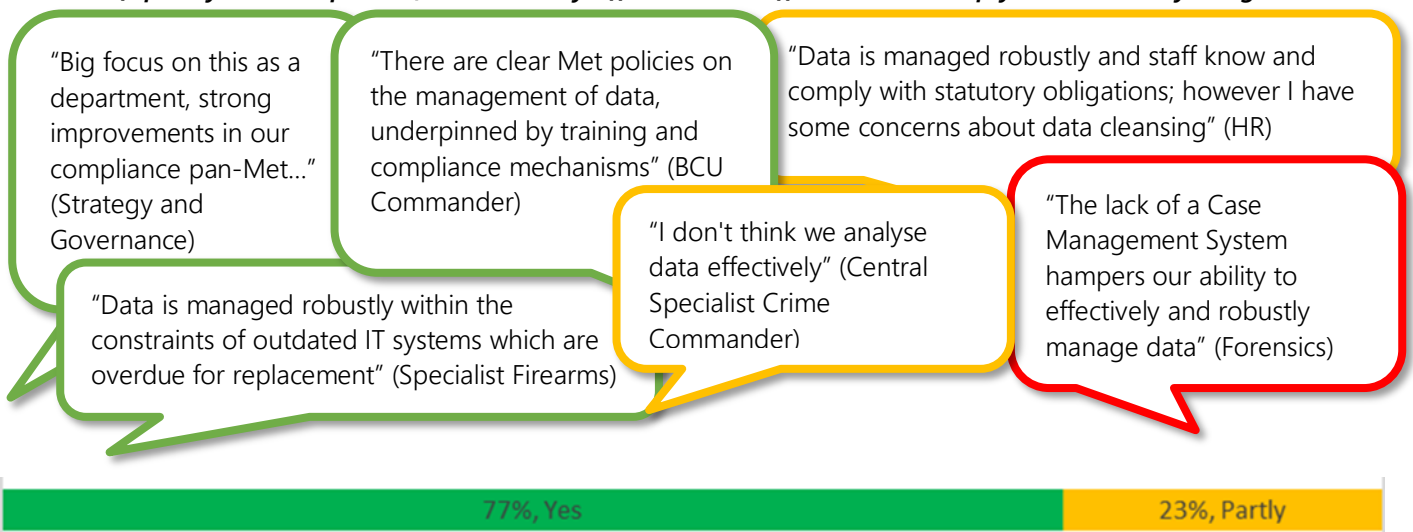
Senior Leadership assessment

Statement of Internal Control on "satisfaction 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".



This question raised a number of points regarding data access and quality including: some mention that there is little data available, and what is available is of poor quality; one comment highlighted the negative effects of centralising analytical capability; and a number of respondents said that obtaining necessary data takes too long. The Data Director identified that improvements in data quality, access and collection were needed, a view echoed by colleagues, and one which we will take forward through delivery of the Data Strategy. However, it should be noted that many respondents referenced that there had been good improvements in the FLEX and local information packs provided to BCUs.

Statement of Internal Control on "satisfaction 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".



Although a generally positive response from across the Met in relation to data management, there is a cautionary note that more needs to be done to ensure compliance is maintained. Robust processes are in

place locally to manage data, with the general consensus being that people are aware of their responsibilities and statutory requirements. Partly compliant returns centred around the lack of specific systems (forensics), weeding/disposal of old manual records and data quality, in general terms, needs to improve or increase in a couple of units, but there is awareness of the issues.

Improvements in 2020/21

Throughout the pandemic, very significant scanning has taken place for instance making the best use of technology and blended working – to enhance organisational agility. We have improved our engagement with other London institutions and there has also been very intense environmental scanning in relation to our relationships with diverse communities. Continued and sustained efforts to bring external voices, across the organisation but also through our governance arrangements and to our leadership events and considerations.

The violence governance structures are in place to effectively track and evaluate activity, with a newly refreshed 6-strand approach to be adopted over the next year. Visibility of police activity is facilitated through the communication strategy and through meetings with partners. The Violence Reduction Unit join up with police is much more effective with cross Borough and BCU working taking place. Continuing with the cross Government and Partner work will embed this more effectively especially as lockdown lifts – through scenario focused tactical planning. Engagement with young people in particular has been difficult and partner interventions and diversion has been more problematic meaning that we have not been able to progress this area as desired.

The Violence Intervention Unit (VIU) was formed and focuses on violent offenders, utilising judicial restrictions to restrict their offending. The team currently lead on a pilot with Project Alpha and Directorate of Legal Services to utilise Gang Injunctions to specifically target violent offenders and the use of social media to tackle violence. The team have devised a process with the PNC to record violent offenders on licence and have implemented a process whereby interactions with offenders on licence is passed to the VIU. Since July 2020, the team have placed 273 licences for violent offenders on PNC/Crimint to encompass all of those currently in the community and implemented eleven Recalls to Prison by virtue of information shared.

The Resourcing Principles for Large Scale Events are now used routinely through the Bronze Resourcing role (responsible for communicating to a command team the resourcing principles once the level of 500 PCs has been reached). This level triggers the need for the command team to consider which resourcing principles they would authorise to meet their resourcing request whilst ensuring that there is a minimum impact of business as usual and BCUs.

We have reviewed three methodologies used to identify the most harmful domestic abuse perpetrators in London to ascertain which the optimum method is. Through engagement with key partners from across London and nationally we agreed that the findings supported a move to combining aspects of the methods and leading to the creation of a Recency, Frequency and Harm methodology which would best identify those perpetrators who were most dangerous and most likely to reoffend. This would support the repeat victimisation lists which identified couples in which domestic abuse is chronic. A full evaluation will be completed by UCL working with the Met and the College of Policing to ascertain whether this methodology should be considered national best practice.

2020/21 Governance Improvement Plan 4 on Data Management

We pushed forward with the delivery of the MPS Data Strategy to drive a consistent approach to our data competence (the means by which we acquire, manage, share, protect, publish and use our data to improve decision making) and our data culture (the way we think about and behave with regard to data and its value as

an asset). The Met website now features monthly reporting on FOIA & DPA compliance. FOIA & ROA compliance has improved. Weekly monitoring is in place, and performance is reported to a Data Board and to Performance Board. The Information Asset Ownership Framework is developing, and the SCIRG (crime data integrity group) has been re-established. Data links have been established on BCUs (Supt HQ supported by Local performance analyst). Delivery of this plan will continue in 2021/22.

Assessment = controls require further improvement

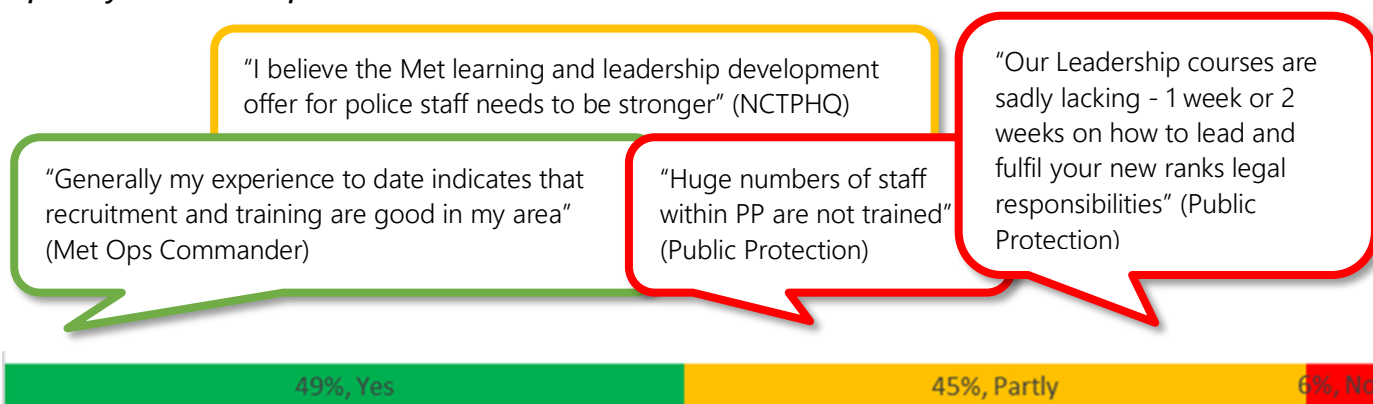
Proposed areas of focus for 2021/22

- Continue progress in improving central Data capability (drive data quality; access to data; data analysis; relevant and timely data) [GIP]
- Develop the Met’s future thinking including through the Blueprint for 2029
- Complete the integration of Victims Code of Practice (VCoP) service into CRIS, so it can provide enhanced victim focus, and raise compliance with VCOP requirements.

E) Developing the entity’s capacity, including the capability of its leadership and the individuals within it

Senior Leadership assessment

Statement of Internal Control on “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”.



There is recognition that there have been huge strides towards increasing police officer recruitment, in line with Government and Mayoral funding, and that the first Apprentice Constables had now been recruited. In contrast, police staff recruitment continued to be an area of concern (causes being cited as the previous recruitment freeze and continuing cost reduction measures across the Met, which is more acute for specialist roles which require longer induction/training periods, such as forensics). There are concerns that the postings process for takes too long, with some O/BCUs reporting resource shortfalls for up to three months waiting for postings, increasing burden on existing officers and staff, and skills shortages.

Inadequate training opportunities is fed back in various roles, although not fully shared: several specialist OCUs including Covert Policing, Criminal Justice and Royalty and Specialist Protection are very positive. Leadership training specifically is mentioned with some positive comments concerning Leading for London, but other comments suggesting there is limited other leadership training available.

Improvements in 2020/21

The pandemic has significantly increased the focus of the risk to workforce wellbeing and some of the controls to support our staff have been developed at pace and have been Covid-19 specific such as supporting staff who were required to shield and making the workplace Covid-19 secure. Alongside our pandemic response, we have reviewed our end-to-end sickness process, and implemented solutions to improve grip and support for attendance management to increase our resource availability and operational capacity. In addition, we have implemented qualified Occupational Health clinical advisors to support local senior leadership teams to assist with complex case management and reduce absences due to sickness.

We have continued our extensive support, through dedicated facilities, Your Employee Assistance Programme, Managers Advice Line and the Career Development Service has been expanded to include colleagues with disabilities. Initiatives focused on enabling flexible ways of working were delivered such as Project Balance (focused within operational policing), MetFamilies and MetBaby – our parental support network - to help all managers and parents prepare for maternity leave, stay in contact and ease their return to work. The new Workplace Adjustments Central Hub is also now available to make the process of returning to work simpler and quicker.

We have invested in resources to build capability. Viper has been expanded to have four permanent operational teams across London, targeting high-harm firearm related offences in support of BCU investigations – improving consistency and effectiveness pan-London. Viper specialise in the development of firearms intelligence, the execution of firearms search warrants and other search warrants against firearms offenders, and the provision of Armed Supported Patrols. In addition, overall vacancies in Forensics Services has been reduced – by nearly 50% since the start of the financial year - increasing capacity for the delivery of technical casework, reducing work outsourced to forensic providers, supporting a reduction in turnaround times and supporting existing staff welfare.

Street Duties trainer capability gap analysis was undertaken to help the Met understand where our training gaps are, and improve trainer training. As part of the new organisation structure to support student officer development and with the introduction of new recruit pathways in 2021, the Met has invested in 240 tutor constable posts to deliver a new street duties programme on every BCU. The induction focused on some key areas relating to the role such as leadership behaviours, input on investigations and managing probationer police officers. Ongoing development of a tutor constable development programme will continue to address the identified gaps.

Following a pilot and evaluation process, we implemented a Met-wide Practice Requiring Improvement approach. Continuous engagement with the Federation has secured their support for this new process. It has been recommended as an appropriate resolution by both the Met Appropriate Authority and by the Independent Office for Police Conduct in their handling of matters.

We have built in scheduled development opportunities for the Crime Management Services and Telephone & Digital Investigation Unit to raise PIP level 1 investigation, quality crime recording, and to improve decision-making skill as well as victim support. In addition, on-line training sessions have been recorded and distributed on Vehicle Crime reduction/prevention, and a training library has been created containing useful tools to assist decision making and investigative development.

2020/21 Governance Improvement Plan 8 on Organisational Learning

OL implementation remains focused on four areas: 1) embedding the OL framework; 2) systemising information; 3) learning from high harm/risk and 4) promoting culture. The Organisational Learning and Research function was established, creating a centre of expertise to drive/co-ordinate future activity. The

Research Faculty steering group has been working to better define the research environment, including a review of research/academic processes and support for external researchers.

The Research Ethics Panel continues to convene to examine research projects and proposals. The implementation of Organisational Learning hubs is underway (including Firearms, Public Order, RASP), three pilot BCUs (SW, AS and AW), and with Heads of Profession and specialist leads. Delivery of the plan will continue in 2021/22.

2020/21 Governance Improvement Plan 1 on Capability, Learning and Development

We professionalised the entry pathways (based on the National Police Curriculum) by implementing the new PEQF recruit training courses. The externally accredited pathways include the Police Constable Degree Apprenticeship (PCDA) and Degree Holders Entry Programme (DHEP) for Uniform and Detectives. We improved access to training content, LinkedIn Learning (a library of external content) rolled out across the Met in December 2019 as part of work to socialise the Met to digital learning.

Management Board agreed to a corporate Learning Management System. This is a digital solution for an integrated learning infrastructure to modernise the continuous professional development of all our staff, ensure our training delivery is as flexible and effective as possible, and improve our data on workforce capability. The new Learning Management System is due to go-live in November 2021, providing the infrastructure to develop organisational capability and skills. This will improve our ability to prioritise critical learning and tailor it to specific policing roles. Delivery of the plan will continue in 2021/22

Assessment = controls require further improvement

Proposed areas of focus for 2021/22

- Progress implementation of the Learning Management System
- Progress the implementation of organisational learning across the Met and in BCUs
- 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]
- Implement the delayed pilot to evaluate the transfer of standard domestic abuse investigation to emergency response teams (paused due to the pandemic)
- Update the Met Scheme of Devolved Financial Management (SDFM), implement of a self-service reporting tool will enable budget holders to carry out their roles more effectively; and ensure budget holders understand their responsibilities, supported by easily accessible policies and procedures and access to appropriate training and guidance [DARA Budgetary Control Framework]
- A review of all Public Protection policies by the autumn, and a similar programme will be taken forward with the Head of Investigation. With a standard layout, this will better alignment to national guidance & show where, how and why we might deviate. This will support & guide frontline officers & supervisors, strengthening of Level 1 Assurance

F) Managing risks and performance through robust internal control and strong public financial management

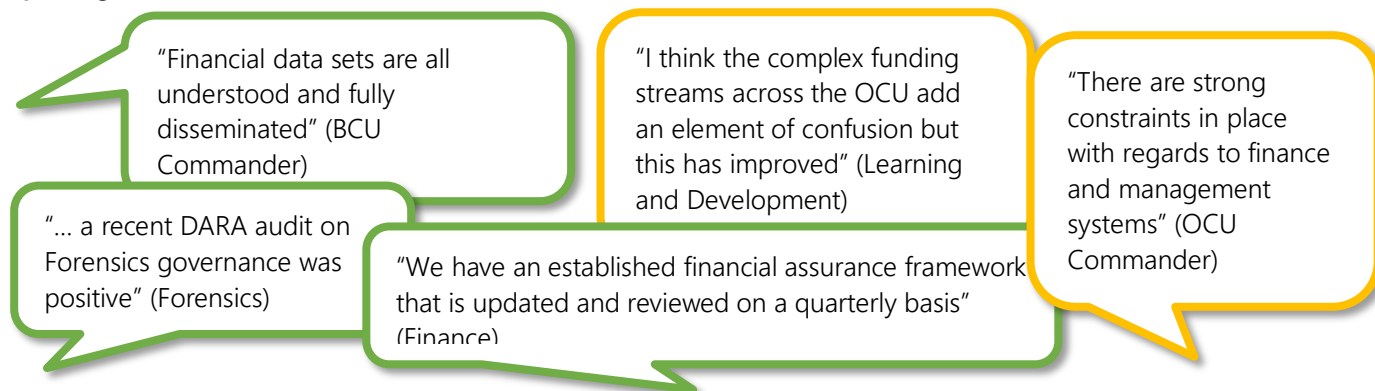
Senior Leadership assessment

Statement of Internal Control on "confidence that risk management arrangements within my area of responsibility, are effective in identifying, assessing, escalating and managing risks".



Assessment indicates that risk management processes are strong, with all Directorates reporting they have risk registers reviewed regularly at SLT level as well as clear risk escalation processes in place. There are some difficulties highlighted with managing risks within a reduced budget, a disproportionate focus on low level, low cost issues, and a lack of understanding of partners' risks, and the impact that may have on the Met.

Statement of Internal Control on "confidence that we have robust assurance structures and effective internal controls within my area of responsibility including financial procedures, management systems and performance reporting".



Financial procedures are adhered to with regular discussions taking place at SLT/COG meetings, and regular reviews of financial information and clear oversight of budgets, overtime and expenditure at senior level. This is also discussed alongside performance management in specific meetings: FLEX or Commander Oversight meetings. Whilst the systems are in place, in some instances people feel a gap is in the level of financial support required.

Statement of Internal Control on "confidence 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”.

“Financial management is stringent and thorough” (Met Ops Commander)

“There is a positive culture in place where staff can and will report wrong doing confident that it will be dealt with properly and in confidence” (BCU Commander)

“Our budget management has improved a lot over the last 18 months” (Learning and Development)

“Finance system allows other business groups to allocate spend against other cost centres without consent of the budget holder” (Property Services)



Robust financial grip is in place and improvement evidenced over last 18 months. It was also noted that financial management forms the Performance Development Review for BCU Commanders and financials form regular or standing agenda items at SLT level across the Met. Further improvements are being made at a local level. A small number of respondents reported that there was little knowledge of the Scheme of Delegation within their O/BCUs and specific issues with the PSOP system.

Improvements in 2020/21

A stocktake review was undertaken to look at how effective the Met is in delivering change, transformation and new capabilities to help meet the ambitions of Met Direction. The review findings were positive and confirmed the strong foundation that has been made by the Met on change and transformation enabled by many parts of the Met, including in particular the Transformation Directorate, Digital Policing and Professionalism. A number of recommendations in relation to organisational leadership, structures, capabilities, and culture are being taken forward. Much work has been done to embed delegated authority processes and these are now working well. Good progress made in putting into practice frameworks to enable innovation.

Significant work was undertaken to ensure Business Continuity plans were fully formed and tested. This ensured the Met was able to maintain operational resilience and mitigate any impact on service delivery due to policing the pandemic. An effective and consistent command structure was put in place via Gold, Silver and a number of functional and geographical Bronzes. The Met was represented at Strategic Coordination Group, Delivery Coordination Group and as part of Operation Talla (national policing response to the pandemic). Significant work was done to ensure Trigger plans around core business were developed and business continuity plans were in place and tested for effectiveness – including testing and exercising with key tactical and strategic stakeholders. Although there is ongoing work to maintain and improve staff confidence via information sharing and accurate and consistent messaging, the Covid risk has now been removed from the corporate risk register and remitted to Gold. Furthermore, following the UK’s exit from the EU, much of the concerns of disruption dissipated and the residual risk related to the use of powers and operational effectiveness has been remitted to the Deputy Commissioner’s Steering Group to manage.

Following confirmation of commitments from central Government and additional funding from City Hall, the risk of overspend as a result of Covid-19 costs were mitigated. While there remains uncertainty for the long term financial position, our risk tolerance has grown given a number of factors. Management Board agreed a suite of financial assumptions in January which will enable us to focus planning around a smaller number of future scenarios.

2020/21 Governance Improvement Plan 3 on Assurance controls, Level 2 and 1 assurance

This area has been strengthened at both Level 2 and Level 1, through work taking place in building up the Continuous Policing Improvement command (CPIC) capacity, increasing Level 1 supervision capability, and reviewing policies. As a test case, the Child Abuse policy was reviewed, shortened and aligned in a manner that flows clearly from definitions, through roles and responsibilities for frontline officers & secondary investigators. A review of all Public Protection policies will now take place by the autumn, and a similar programme will be taken forward with the Head of Investigation.

The Released Under Investigation (RUI) improvement plan resulted in significant reductions in RUI stock. Use of Bail has increased and pre-charge bail consultation for a legislative change around RUI has taken place. A process is in place to deliver further Level 2 Assurance via commissions initiated by either a Head of Profession or Lead Responsible Officer – the commissioning process is in place through the CPIC Tasking Meeting.

To support Year 1 officer growth, we strengthened Level 1 supervision for new recruit, with 500 posts covering Tutor Constables & Sergeants, PEQF Centre of Expertise, and Professionalism Data Quality Team. Plan delivery will continue in 2021/22.

2020/21 Governance Improvement Plan 6 on Decision making and delegation

In the past year we have introduced and cemented a stronger MPS assurance framework for our investment decisions. 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. Key considerations for this group include commercial, legal and data compliance, financial considerations, and strategic and operational fit. We have recently augmented our focus on inclusion and diversity considerations. MOPAC's Chief Finance Officer has a standing invite to these meetings which are supported by our strategic secretariat. As a result of this work, our Management Board is better able to focus on the biggest strategic considerations and has stronger assurance about proposed investment decisions, meaning that decision-making levels are appropriate for the risk involved. Controls and further improvements can be remitted to Corporate Services senior management team.

Assessment = controls are established

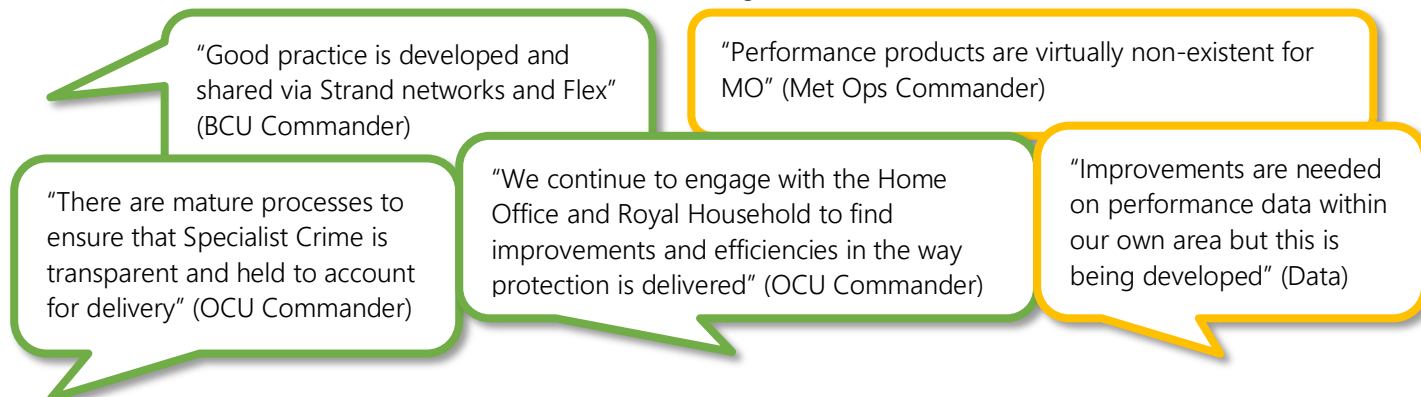
Proposed areas of focus for 2021/22

- Finalise the new scheme of delegation in collaboration with MOPAC
- Train key contacts in business groups to strengthen Risk Maturity following RM survey
- Introduce better proportionality of decision-making in relation to risks, so the organisation's assurance capabilities can focus on higher risk items.
- Validate assumptions for the Estate Strategy, including new ways of working, defining the business change activities and physical design changes needed to implement them.
- Develop IT solution to improve the planning and resourcing process, including improvement to CARM (Computer Aided Resource Management system)
- Improve consistency and management of Disclosure
- Introduce an integrated forensic case management system to support the efficient monitoring of performance of key suppliers.

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

Senior Leadership assessment

Statement of Internal Control on "confidence that 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".

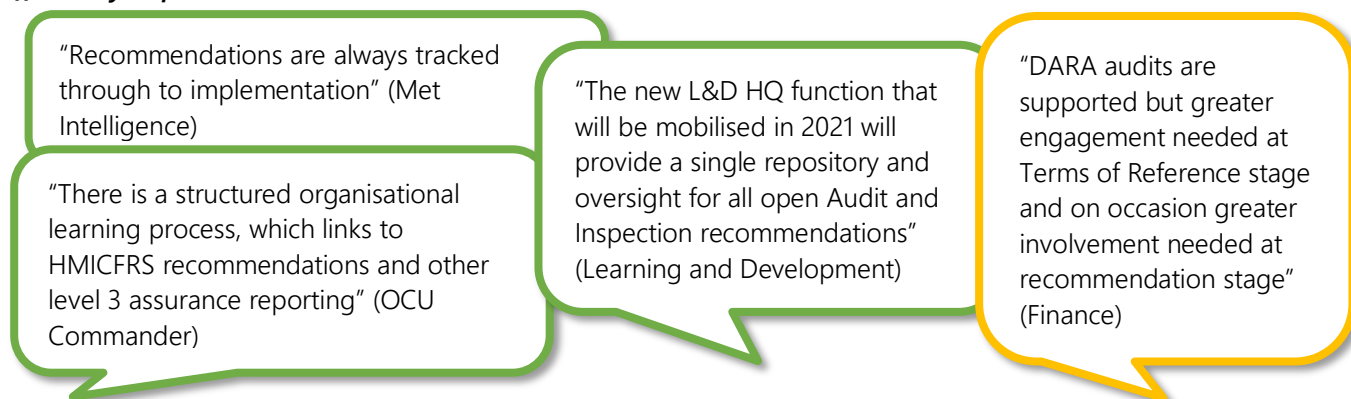


90%, Yes

10%, Partly

Compliant processes were evidenced presenting there is regular oversight, clear and strong engagement, regular discussion at Chief Officer Group meetings and sufficient performance reporting. However, people felt improvements are needed in the provision and content of performance data, as some areas report they have little.

Statement of Internal Control on "satisfaction 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".



87%, Yes

13%, Partly

The majority of Senior Leaders gave a clear indication that they manage inspection and audit outcomes effectively, with recommendations being tracked and reported on at local OCU board level. Partially compliant returns were mainly around the number of aged recommendations outstanding and a lack of local inspection.

Improvements in 2020/21

To drive consistency and improved investigative response on Missing Persons within the initial 48 hours, we have developed a range of training guides and measures to equip frontline officers. This involved administrative steps to ensure solid management grip, role awareness for Local Resolution Team (LRT) staff and supervisors, and investigative and tactical aides to improve the overall response. To ensure ownership and

incident progression a central 'cloud' has been implemented, thereby enabling clear monitoring of incidents, from creation, to Missing Persons Unit handover at 48 hours. All developments are now being rolled out.

We have delivered the Active Risk Management System (ARMS) refresher training as a webinar working with the National Probation Service to capture best practice. ARMS performance is one of the key areas of focus in the Registered Sex Offenders (RSO) Ten Point Plan. This responds both to the HMICFRS recommendation for better ARMS compliance and provides staff an update on the changes to ARMS Guidance from last year.

The Central Jigsaw Team completed a lengthy review of the Civil Orders used to manage high risk sex offenders to make sure the Met is not vulnerable to litigation by the enforcement of unlawful civil order prohibitions. This review looked at 3,738 Sexual Offence Prevention Orders and Sexual Harm Prevention Orders, to ensure the prohibitions and the duration of the orders were legal, necessary and compliant with four specific legal cases. This project would not have been possible if the process was not agreed by the courts whereby application bundles were submitted to the court electronically. This negated the need for a barrister to attend court to present each case or for an officer to attend each court hearing to provide evidence. This has not only resulted in a substantial financial saving, but also hours of court time has been saved.

Assessment = controls are established

Proposed areas of focus for 2021/22

- Redesign the corporate data products portal to provide the right level of data, to the right people through the portal re-design
- Strengthen the pace of implementation of DARA internal audit recommendations
- Work to provide clarity around policy and introduce a more robust checking mechanism to reduce and recover incorrectly claimed expenses [DARA Key Financial Systems - Expenses: Limited Assurance.]

Governance Improvement Plans 2021/22

The Met is committed to implementing a governance framework that supports the Met Direction, and improves its governance and internal control environment. Evidence from our 2020/21 review of the Met's internal control environment suggests that we made progress against all governance improvement plans 2020/21. Following consideration by the Risk and Assurance Board, the following areas will be subject to a Governance Improvement Plan in 2021/22:

Capability, Learning and Development

Vision: we have clear and effective governance arrangements to develop the capability we, and our workforce, need to address demand.

Public and Partner Engagement

Vision: 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.

Assurance controls, Level 2 and 1 assurance

Vision: Senior Leaders have assurance that the right controls are in place and are working effectively at all levels of the organisation.

Data Management

Vision: we have raised 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).

Organisational Learning

Vision: 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.

Competence and standards of professionalism

Visions: we are a trusted organisation, supported by good governance, efficient systems and robust compliance controls.

Declaration

We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements, focusing most effort in the above 'priority' categories. 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.

Cressida Dick
Commissioner of Police of the Metropolis

Robin Wilkinson
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 45,000, including 32,500 police officers, 1,800 MSC, 9,800 staff and 1,200 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.

We face a challenging environment as London changes, crime behaviours adapt and perceptions of crime and expectations of policing activity evolve. Furthermore we will continue to adapt as society moves out of the pandemic. The capital faces high levels of threats in terrorism, serious organised crime, and cyber-criminality. In addition to using tried and tested methods we need to be innovative and explorative in our policing approach. To meet these demands the Met must have a responsive system of governance, with clarity around the mechanisms, processes and relationships through which the organisation is directed and controlled. We are mindful that governance is as much an organisational culture as a set of rules and that good governance evolves with the organisation. Responsive governance will help to create a police service that can deliver on our priorities.

The Met is driving significant organisational change with the aim to increase effectiveness and efficiency, and to focus resources on priority areas, providing the best possible service to Londoners. There are eight programmes in the Transformation Portfolio including circa 100 projects at varying stages, encompassing local policing, public access and engagement, investigations, technology and data, and estate.

Financial context

The Met received a welcome uplift as part of the Police Settlement which has enabled it to submit a balanced budget for this financial year. The settlement and additional precept funding will allow the MPS recruit an additional 1,370 full-time equivalent officer (FTEs) as per the Home Office recruitment target and forecast a balanced budget for 2021/22.

But even with these uplifts, there remain significant financial pressures over the medium term, with a funding gap of c£249m in 2022/23, of which c£62m is a 'structural' shortfall and c£187m relating to officer uplift funding required to meet the Mayor's target of 6,000 additional FTEs for the Met. We continue to explore savings opportunities to help bridge the gap, but as £886 million of savings have already been delivered since 2013 and a further £150m are planned and reflected in our budgets by 2024/25 the opportunity to deliver further significant savings without damaging operational performance is limited. Also challenging is the fact that we only receive one-year funding settlements which makes medium term planning more difficult.

We have an ambitious Capital Programme with a planned expenditure of circa £1.6 billion to 2024/25. The Capital Programme reflects the recently updated Estates Strategy and our planned digital investments to drive productivity as well as outlining spend on Fleet, CT capital and transformational activity. More detail is set out in the published MOPAC/Met Capital Strategy. Government grant funding is low at £3.3m, which means we have to fund the Capital Programme by either capital receipts or external borrowing, with the latter impacting on our revenue budgets via increased capital financing charges.

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.

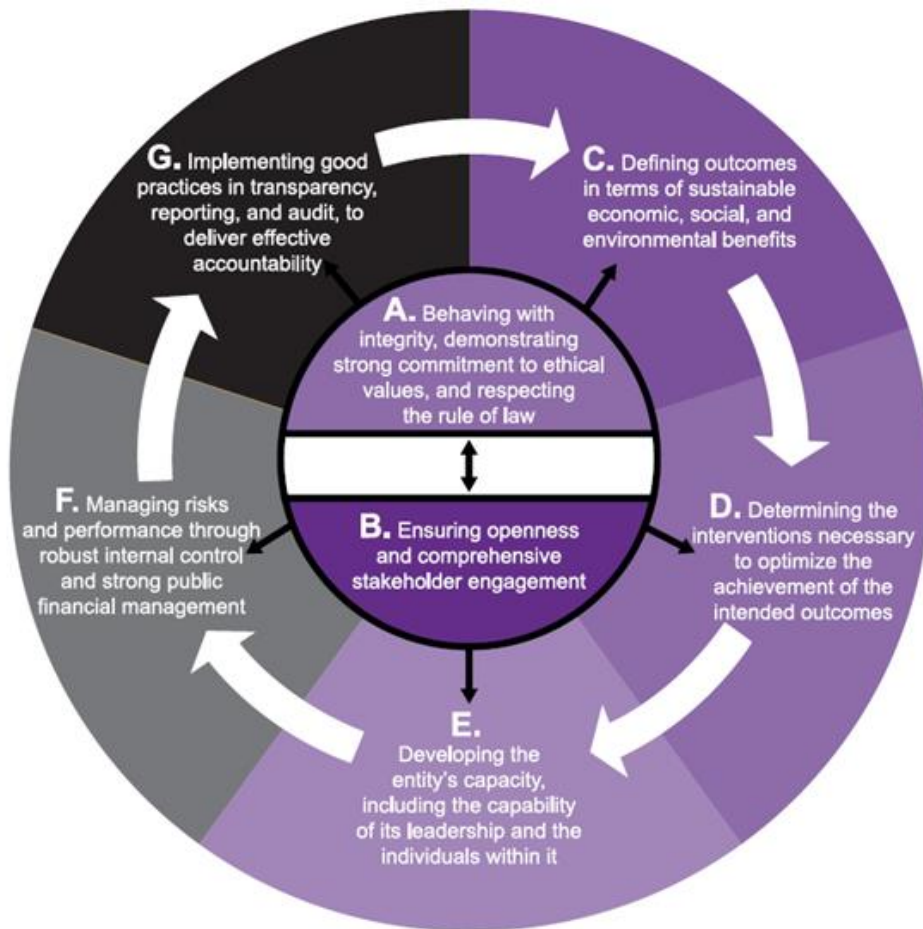
In adopting this framework the Met accepts that:

- 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:

- A) Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
- B) Ensuring openness and comprehensive stakeholder engagement
- C) Defining outcomes in terms of sustainable economic, social and environmental benefits
- D) Determining the interventions necessary to optimise the achievement of the intended outcomes
- 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



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 Leadership Statement of Internal Control; Internal and External Audit and Inspection including opinion; and Risk and Assurance activity including review of progress against AGS Improvement Areas. These statements, completed by 69 senior leads in 2020/21 – covering all the main Commands and Directorates- clarify the extent to which each were satisfied that key processes and internal controls in their area of responsibility operate effectively. 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, and through Board reports and analysis on operational, transformation and financial matters. 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).