

**MOPAC**MAYOR OF LONDON  
OFFICE FOR POLICING AND CRIME

# MPS-MOPAC JOINT AUDIT PANEL

## 27 July 2020

### Met Audit & Inspection Report

Report by: Director of Strategy & Governance

Non-restricted paper

#### Report Summary

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

HMICFRS inspection activity has been suspended due to the ongoing Covid-19 pandemic, therefore there is no new inspection activity to report on. HMICFRS is expected to resume inspection activity in October 2020.

In relation to the inspection of the Met's adoption of the recommendations of Sir Richard Henriques and the IOPC Op Kentia report (following Op Midland), HMICFRS has been formally advised that all recommendations have been put in place by the completion date of 30 June. We have asked DARA to advise on our long term ability to continue delivering against the recommendations.

Since last quarter's report, the Met has received 70 new DARA actions that meet this monitoring threshold. During the same period, 19 actions were implemented and are now proposed as closed. Of these, 16 are from original audits and 3 from follow-ups.

##### Key Considerations for the Panel

The Panel should consider the breadth of audit activity taking place by DARA.

##### Interdependencies/Cross Cutting Issues

By the very nature of the audit and inspection regime, there are considerable cross-cutting elements across the Met.

##### Recommendation

The Audit Panel is recommended to note the progress being made to track and monitor audit actions centrally that meets the agreed threshold.

## **1 HMICFRS update**

### **Covid-19 – HMICFRS position**

On HMICFRS announced on 13 March 2020 that all inspection work that requires appreciable input from forces is suspended until October 2020. This includes single-agency and joint-agency inspections. They will continue to assess performance on the information they have but will not undertake any in-force inspections. They have deferred the Spring 2020 data collection (which is the information they would have asked for in respect of the period ending 31 March 2020) and the May 2020 deadline for submission for the force management statement has been extended without time limit.

HMICFRS continues to carry out inspection work and work ancillary to inspections remotely.

HMICFRS state they are mindful of the importance of forces continuing to manage risk, especially for vulnerable people; they will take this into account when they re-start inspections, including considering any data anomalies.

### **Force Management Statements**

**FMS2020** – FMS submission for 2020 was stopped in line with other HMICFRS inspection activity. This remains HMICFRS's position, until it publishes its recovery plan and revised timelines. We are currently running a Policing Futures exercise to expand understanding and articulation of how future trends may impact on demand in the various FMS categories.

NPCC Performance Management Co-ordination Committee updated forces in June that it seems likely that forces will be required to submit their next FMS by May 2021, but that forces will be free to submit their FMS earlier. Most forces have been planning to run new demand assessments in about September to October, to feed into strategic planning and budget cycles, and may be in a position to submit an FMS between about November and January.

### **Thematic inspections**

#### **Op Larimar (lead DAC Matt Twist):**

HMICFRS published their report on 13 March 2020. Following our challenges as part of the pre-publications process, some changes were made to the report and the recommendations. They made 16 recommendations, 11 of which are for the Met to address and 5 for the College of Policing, NPCC, the Home Office or the Ministry of Justice. The 11 recommendations specifically for the Met called for amendments to training, guidance or policies and needed to be put in place by 30 June 2020.

HMICFRS has been formally advised that as of 30 June, all recommendations are now complete; the monitoring portal has also been updated to reflect this. HMICFRS will now review the responses to decide whether sufficient work has been done to address the recommendation. We have asked DARA to undertake some partnership work with us to advise on the confidence we should have in our ability to deliver against the relevant recommendations.

**National child protection inspection (lead AC Ephgrave):**

As all HMICFRS inspection activity has been postponed, the fieldwork phase of this inspection that was scheduled to take place 16 March - 3 April 2020 did not happen. It is not yet known whether this inspection will take place as a priority once restrictions have been lifted.

**HMICFRS Monitoring Portal (formerly Recommendations Register)****Current position**

The Monitoring Portal remains mostly for recommendations and not for all areas for improvement (AFI), therefore we are continuing to maintain our own tracker that contains both recommendations and AFIs, despite many other forces moving solely to the monitoring portal.

The monitoring portal is regularly updated with our progress information against each of the recommendations. It is not possible for us to close the recommendations; only our Force Liaison Lead (FLL) has the ability to do this, therefore to see a change in our figures, we are reliant upon them completing their review

The Monitoring Portal currently shows 109 open recommendations.

<b>Inspection theme</b>	<b>Total</b>
Vulnerability (including 13 specifically related to the NCPI programme)	60
PEEL	15
Stop & Search	1
Information management	1
Undercover Policing	17
Fraud	2
Integrated Offender Management	4
CPS	6
Police Integrity & Corruption	3

This quarter, two recommendations have been closed by HMICFRS. We are currently working with HMICFRS to ensure that their portal and our tracker are synchronised.

We are aware that our FLL and IO (Inspection Officer) have reviewed a small number of our entries and rejected our request for closure citing that more work is required to be completed and / or evidenced to justify the closure. Recommendation leads have been informed of the need for additional activity to meet the recommendation.

Our FLL is scheduled to undertake a full review of our recommendations and AFIs within the forthcoming quarter. There are currently 41 recommendations and AFIs awaiting their review for consideration to close.

**Current open recommendations and AFIs – Met tracker**

<b>Inspection year</b>	<b>Met or Nationwide</b>	<b>Inspection name</b>	<b>Total open</b>
2013/14	Nationwide	Undercover Policing	17
	Nationwide	Girls in the Criminal Justice System	1
	Nationwide	A joint inspection of the treatment of offenders with learning disabilities within the criminal justice system	1
2014/15	Nationwide	Joint Inspection of the Provision of Charging Decisions	1
2015/16	Met	National Child Protection Inspection	8
	Met	PEEL 2015	3
	Nationwide	Online and of the edge	5
2016/17	Met	PEEL – Efficiency & Legitimacy	4
	Met	PEEL - Effectiveness	2
2017/18	Nationwide	Living in Fear	1
	Met	CDI	4
	Met	National Child Protection Inspection	1
	Met	Custody	3
	Met	PEEL – Effectiveness	4
	Nationwide	A progress report on the police response to domestic abuse	1
	Nationwide	Joint Inspection: Handling of Cases Involving Disability Hate Crime	2
	Nationwide	Understanding difference: the police's initial response to hate crime	4
2018/19	Nationwide	Counter Terrorism	19
	Met	Counter Terrorism	1
	Met	JTAI – Multi-agency response to sexual abuse in the family Islington	4
	Nationwide	Policing and Mental Health - Picking Up the Pieces	4
	Met	National Child Protection Inspection	1
	Met	PEEL (Integrated)	20
	Nationwide	Cyber: Keep the light on	1
	Nationwide	Fraud: Time to Choose	4
	Met	Custody	10
2019/20	Nationwide	The poor relation: The police and CPS response to crimes against older people	5
	Nationwide	PEEL Spotlight report - Shining a light on betrayal - Abuse of position for a sexual purpose	3
	Nationwide	Evidence led domestic abuse prosecutions	4
	Met	Joint targeted area inspection of the multi-agency response to children's mental health in Bexley	3
	Met	An inspection of the MPS's response to a review of its investigations into allegations of non-recent sexual abuse by prominent people (the Henriques report)	11

These figures are from our tracker and only include recommendations / AFIs that are open, these do not include figures of those that are awaiting FLL review.

Due to the ongoing inquiry into Uncover Policing, none of the 17 recommendations that fall under HMICFRS’s national thematic report from 2013/14 will be progressed at the time; HMICFRS has provided all forces with an agreed ‘holding position’ status for each recommendation. All other recommendations continue to be actively progressed, and updated on a quarterly basis.

The AFIs from the most recent PEEL inspection and the thematic around Cyber are still the only ones on the monitoring portal at this stage.

The Monitoring Portal currently shows 20 open AFIs. HMICFRS has now indicated that it will enter more AFIs onto the Monitoring Portal, however, this will be restricted to PEEL and Fraud AFIs only. We anticipate these will be added over the coming quarter.

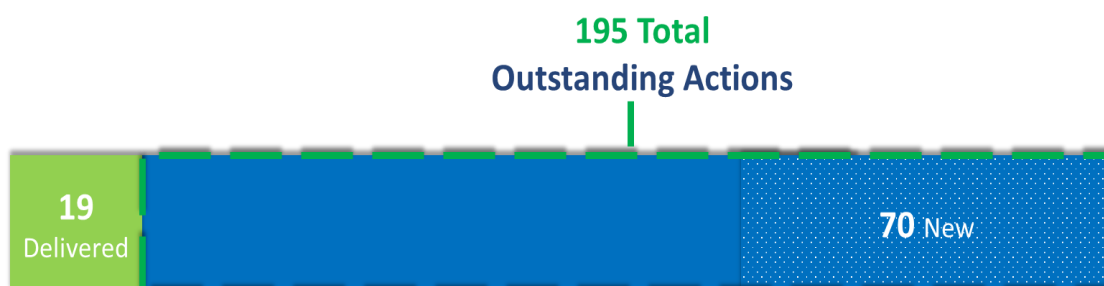
Inspection theme	Total
PEEL	19
Cyber	1

## 2 Internal Audit update

Strategy and Governance monitor Met progress on all high-risk actions from DARA’s audits, as well as the medium-risk actions of any audit receiving a “limited” grading. Responsibility for monitoring implementation of the lower risk actions sits with leaders locally.

Since last quarter’s report, the Met has received 70 new actions that meet this monitoring threshold. During the same period, 19 actions were implemented and are now proposed as closed. Of these, 16 are from original audits and 3 from follow-ups. These will be shared with DARA to assist with formally closing these actions in the follow up audits and, so any challenges can be raised. Whilst this is a reduction on the number of new actions since the last quarter, there has also been a reduction in the number of actions submitted for closure. There has been a renewed focus by the business on outstanding actions over the last two quarters and therefore it is expected that the initial closure rate for the first quarter would be higher than the second (44 and 19). The number of actions arising from the audits does provide reassurance that our audits are focusing on the right areas of the business.

To ensure a continued focus on audits with a limited grading, all leads for limited audits provide Risk and Assurance board with a one page brief. This details current and planned activity to address the risks and recommendations from the audit and to provide assurance to board on the way ahead for this area.

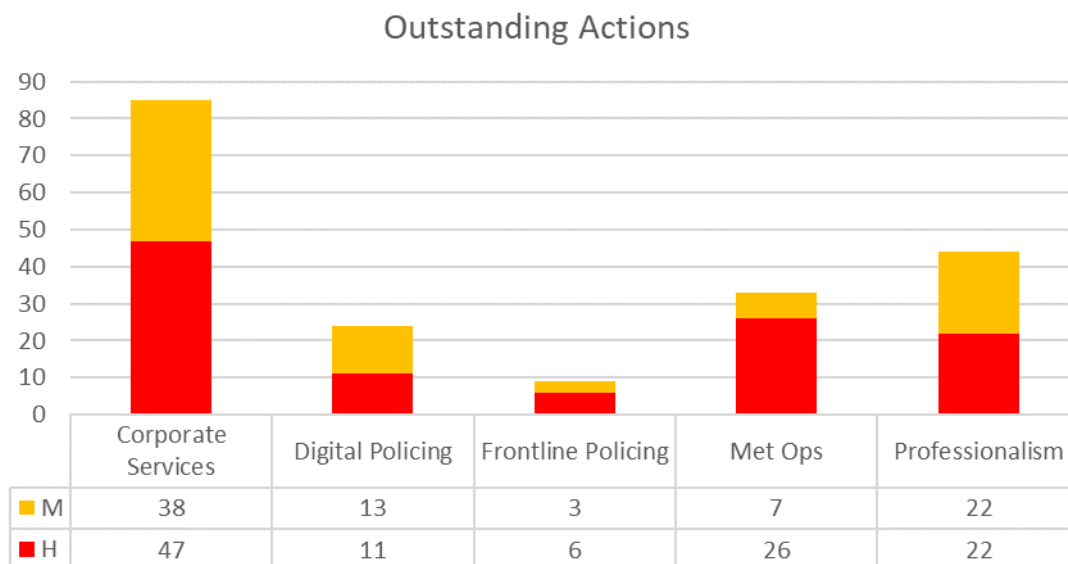


We requested updates on 177 recommendations, not including those areas that had been audited within the last update cycle. Of the 177 we received updates on 99. It should be noted that the timing of the update request was at the start of the lockdown phase of the pandemic. Mindful of this, leads were asked to provide updates if they had the resources and capacity to do so at that time. Risk and Assurance board representatives are asked to continue to support the engagement in this process to ensure we hold the most current update for each high risk action.

All Chief Officers received a list of outstanding actions as part of the update cycle and remain ultimately responsible for the timely updates and action progress. There has been an encouraging level of engagement by the business and subsequently an improvement in the quality of the data we can monitor centrally.

**Agreed actions by business area**

The 195 outstanding actions pertain to 31 audits. 83 are in response to medium-risk in “limited assurance” reports and 112 to address high-risk from all reports. Distribution by business group is as follows:

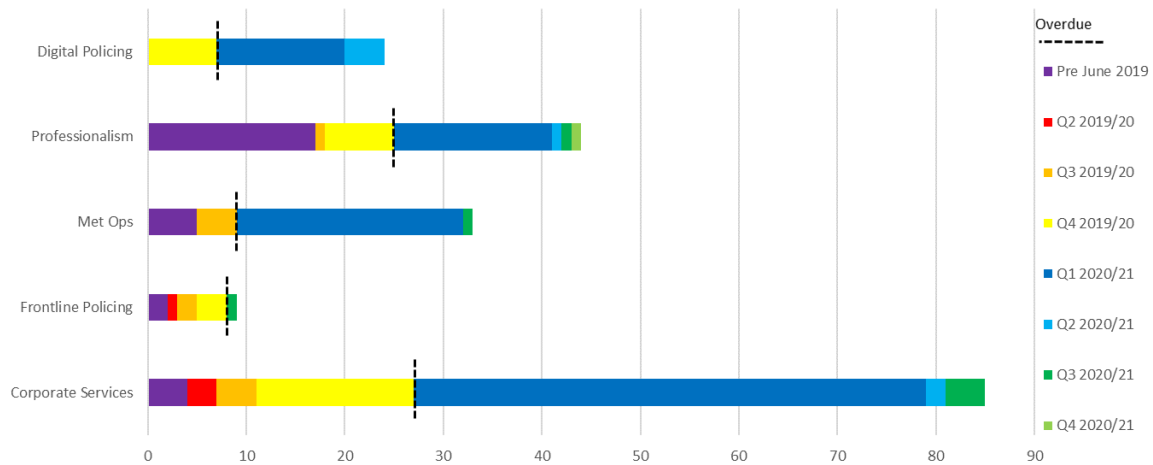


Corporate services remains the area with the most outstanding actions and have received an additional 32 this quarter from the findings of the Key Financial Systems – Expenses and MPS Counter Fraud Arrangements follow up audits. Met Operations have also had an increase of 22 new actions arising from the Review of framework supporting Released under investigation audit and the Review of forensic services delivery audit. Professionalism have 16 new actions from the Framework supporting Inclusion and Diversity strategy.

Within the audits we received this quarter 33 of the 70 actions were due within the same quarter. All of these were from follow up audits. This suggests that the Met audit leads may still be too optimistic in the timeframe they agree with DARA at the time of audit finalisation.

19 actions have been submitted for closure this quarter (11 Corporate Services, 7 Digital Policing and 1 Frontline Policing). These have been sent to the Risk and Assurance board representative for the respective areas and will also be shared with DARA for information and review.

*Open actions by business group and due delivery date:*



In the graph above, the actions shown in purple, red, amber, yellow are overdue, and those shown in blue and green have future dates.

We now have 65 actions which are past their original due dates. Where we are confident of a new implementation date (leads have proposed new dates for 63 of the 65 where appropriate activity has been identified and plans in place to address the outstanding risks) it may be useful to revisit the original deadlines in conjunction with DARA.

Corporate services is the area with the most outstanding actions but they have increased their efforts in ensuring these are reviewed and that activities are in place to address these. However, the substantial forward pipeline is evident for Corporate Services, Digital Policing and Met Operations. Local planning and monitoring is required to ensure where possible the due dates are achieved, or a revised date is agreed with DARA.

**Delays in meeting due dates**

As part of the quarterly update we ask leads to provide us with the reason for any delays they experience meeting the original agreed action deadlines. To better understand the most notable delay themes, the chart below includes the delay reasons of both currently delayed and delivered (but delayed) actions. Since starting to collect this data we have had 71 responses (including those that are now shown as delivered), these key challenges could be broadly defined in the categories shown below:



The most frequently cited reason for the delay completing the outstanding action is that the action is dependent on another review (either internal or external). Following a deep dive into the previous category “Included as part of a wider transformation/review” it was apparent that this category needed to separate corporate transformation programmes and other reviews that were taking place either locally or as part of a commissioned external review.

There have been 12 actions (mainly within the Security Clearance & Vetting - Effectiveness & Efficiency and Wellbeing Strategy Development and Implementation audits) that have experienced Covid-19 related delays. These are due to postponed meetings to reporting delays and the prioritisation of activity elsewhere.

Continuing to analyse the reason for delays should provide us with a valuable insight into areas that may need further attention or any other changes we need to make in our approach to internal audit.

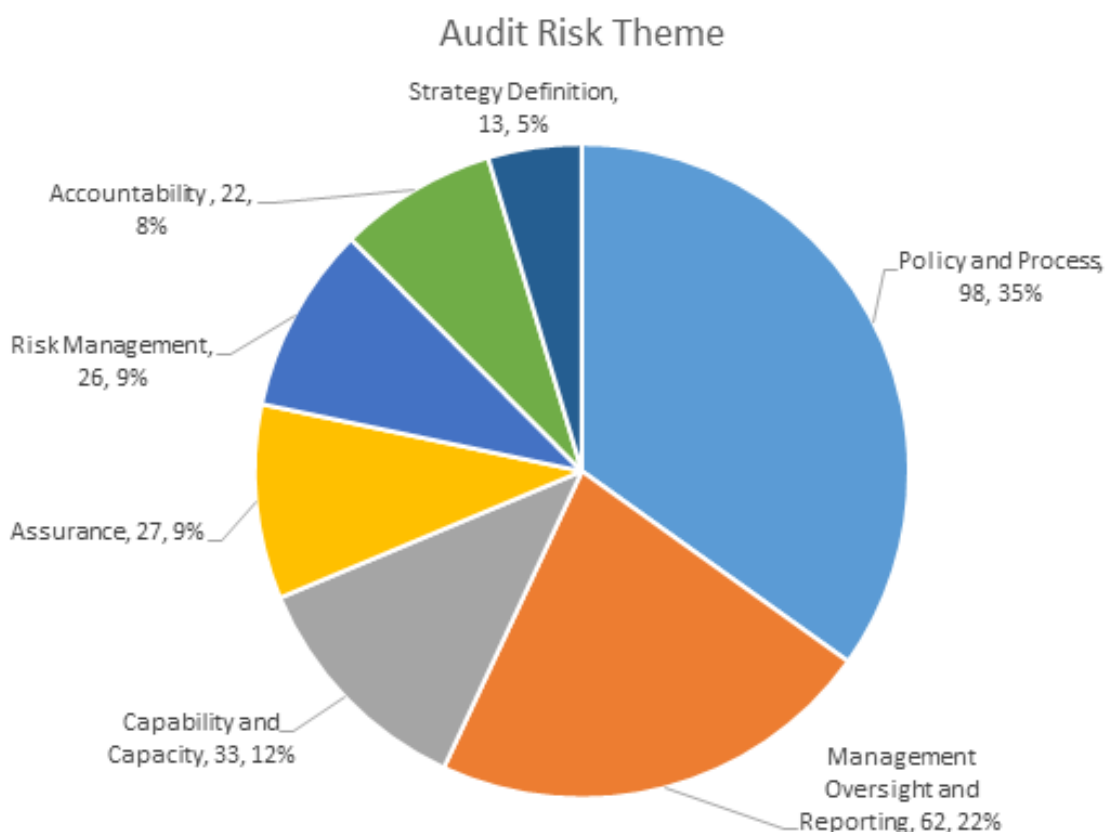
### Forthcoming actions

94 actions need to be implemented within the next 12 months (compared to 56 last quarter). Of these, 28 fall within the remit of Met Operations with 17 from the *Review of Framework Supporting released Under Investigation Limited* audit. Corporate Services have 26 due with 13 from the PSOP Access Controls Limited audit. 21 of those are due within the next 6 months. We will work with Met Operations and Corporate Services ensure we have a robust tracking mechanism and clearly defined action plans in order to ensure these deadlines are met.

### Key Audit Themes

We have now aligned the key themes arising from the audits with those that DARA auditors use. Across all actions, a thematic analysis draws out the following recurring themes in terms of risks identified.





Over half of the key themes fall into Policy and Process and Management Oversight and reporting. We will undertake some deep dive analysis and work with DARA for the next Risk and Assurance board to gain more insight into specific issues and identify activities to address these moving forward.

### **New Audits since March**

Since March we have received the findings from the following audits:

- Review of Framework Supporting released Under Investigation – Limited (Audit)
- Review of Forensic Services Delivery Framework – Adequate (Audit)
- Key Financial Systems – Expenses – Limited (Follow-up)
- MPS Counter Fraud Arrangements – Limited (Follow-up)
- Framework Supporting Inclusion & Diversity Strategy – Limited (Audit)

We also received the findings from the following audits:

- Leading for London – Adequate (Audit)
- Key Financial Systems - Accounts Receivable – Adequate (Audit)

However as these were graded adequate with no high risk actions, actions arising from these audits will be monitored locally by the business.

Areas who have received a Limited graded audit have provided a brief of current and planned activity to address the audit risks and recommendations and to provide assurance on the way ahead for this area.

### **3 Equality and Diversity Impact**

This paper outlines HMICFRS inspection activity and DARA audits. Any significant programmes of work undertaken to implement recommendations will be subject to equality impact assessment.

### **4 Financial Implications**

There are no direct financial implications arising from this report. Any additional financial implications from the findings of audits and inspections will be subject to normal investment processes.

### **5 Legal Implications**

There are no direct legal implications arising from this report.

### **6 Risk Implications**

Inspections can highlight significant corporate risks. These are analysed by the Planning and Risk Team and included in the Met's risk management framework where applicable. This paper has no direct health and safety implications.

### **7 Contact Details**

Report author: Tracy Rylance and Rosiân Jones, Planning, Risk and Assurance, Strategy & Governance

### **8 Background papers:**

None