

M O P A CMAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL

17 January 2022

Met Audit & Inspection Report

Report by: Director of Strategy & Governance

Non-restricted paper

Report Summary

Overall Summary of the Purpose of the Report

This report provides Audit Panel with a summary position of DARA and HMICFRS activity and engagement over the last quarter.

Since last quarter's report, the Met has received 35 new DARA actions that meet this monitoring threshold. During the same period, 6 actions were implemented and are now proposed as closed.

HMICFRS concluded their Met specific counter-corruption and vetting inspection and shortly thereafter conducted a thematic inspection focused on misogyny and predatory behaviour. Evidence and insight from these two inspections will be used to inform the PEEL assessment; dates for PEEL fieldwork are now confirmed as 22 February – 18 March. Two further inspections have been confirmed at the end of January / early February.

Key Considerations for the Panel

The Panel is asked to consider the breadth of audit activity taking place by DARA. The total number of outstanding actions is now 95 (60 High priority, 35 Medium priority) compared to 71 at last reporting quarter.

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 Risk and Assurance Board update

Risk and Assurance Board met on 30 November 2021 where they considered progress against outstanding audit actions and discussed the most recent limited audit (*Development & Implementation of the Commercial Framework*); they also reflected on the number of HMICFRS inspections over the last year and deliberated the most recent inspections related to counter corruption.

2 Internal Audit update

Performance progress on Internal Audit metrics

The revised corporate performance framework 2021/21 now contains the below audit metrics under pillar 7 of the Met Direction: 'Responsible, Exemplary and Ethical'. These metrics have been introduced this financial year. The progress we are making to achieve these ambitions will be reported on a quarterly basis within this report. The current position is as follows:

- 1) Implement 90% of our high-risk audit recommendations within the deadline (FY 2021/22).

Current Performance = 78% (15 of 19)

The above figure is based on actions completed since April 2021 to date. However due to reporting deadlines and the timings of the formal quarterly update request to the business, the calculation is based on an "as is" point in time. There may be a slight fluctuation between quarters due to board paper cut off dates.

- 2) Increase the percentage of audits rated adequate or above. (Improve from the baseline - 64%).

NB – figures are sourced from the audit plan tracker and therefore may not capture the full spectrum of audit activity (restricted audits) and will not include advisory work

Breakdown of 20/21 figures:

Q1 20/21 - 50%
 Q2 20/21 - 60%
 Q3 20/21 - 86%
 Q4 20/21 - 86%

Total – 20/21 = 76% (average quarterly figure of 70.35%)

Q1 21/22 - 75%.

Q2 21/22 - 0% - 2 limited audits received in reporting period, the remainder of the reports were follow up audits.

To ensure focus is kept on closing high risk recommendations and to progress in achieving our target of 90%, Strategy and Governance have provided an end of year current position summary of outstanding actions to all Management Board leads

across the Met. This, together with full details of all high level outstanding risks and actions enables leaders to seek reassurances locally that activity is taking place and actions are being closed in a timely manner within the deadlines. We have already been provided with a number of updates which show progress being made with addressing these.

Internal Audit Progress update

Since last quarter’s report, the Met has received 35 **new actions** that meet this monitoring threshold (12 High priority, 23 Medium priority). During the same period, 6 **actions were implemented** (5 High, 1 Medium) and are now proposed as closed.

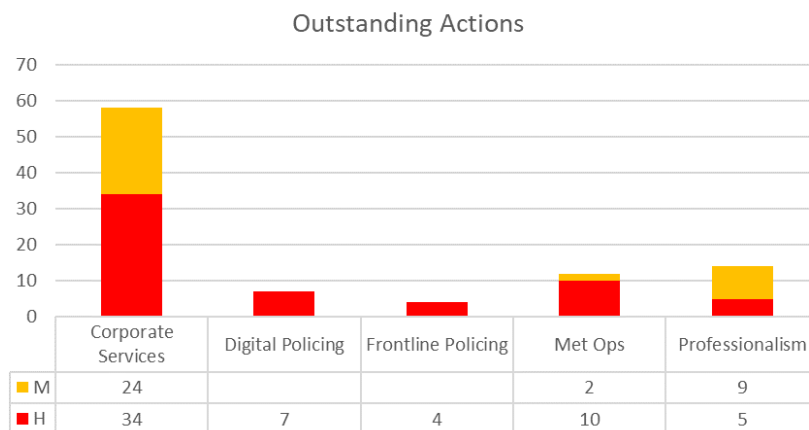
The total number of outstanding actions is now 95 (60 High priority, 35 Medium priority) compared to 71 at last reporting quarter. As discussed at previous boards 13 of these actions relate to training and form part of the Learning and Development Transformation programme. We have agreed with DARA that these will be addressed as part of the wider programme and monitored through the programme governance processes but are still included in the outstanding figures within this report.

Processes remain in place to ensure COG meetings and Risk boards are sighted on outstanding actions. All Chief Officers receive a list of outstanding actions as part of the update cycle and remain ultimately responsible for the timely updates and action progress.

Agreed actions by business area

The 95 outstanding actions pertain to 18 audits. 35 actions are in response to medium-risk in “limited assurance” reports and 60 to address high-risk actions from all reports.

Distribution by business group is as follows:

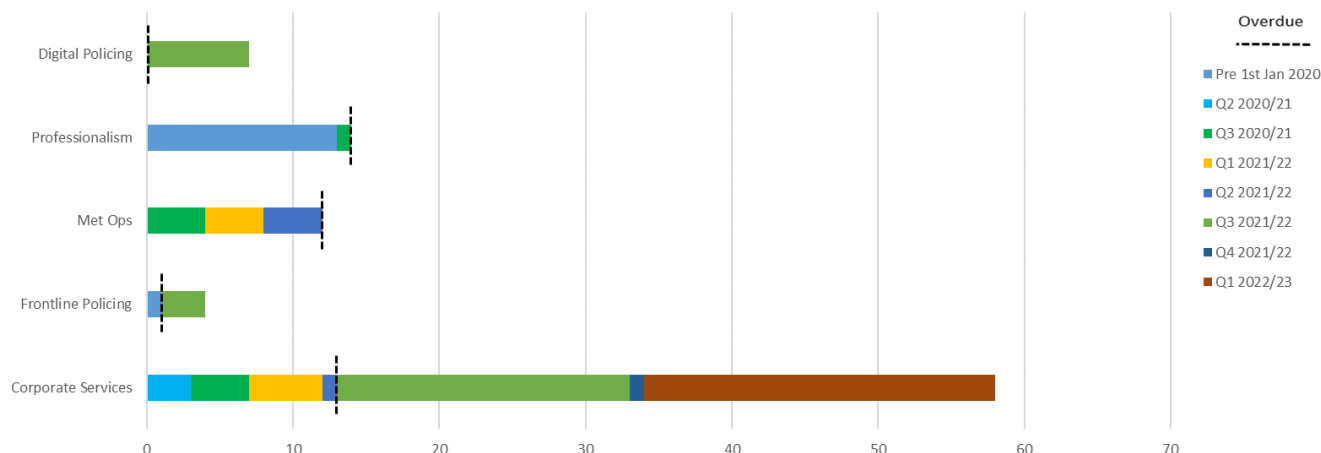


Corporate Services have the most outstanding actions. This business area encompasses some of the most focused audit risk areas in the Met (Finance, Commercial, and Safety & Health) so we should expect the number of actions to be greater than other parts of the Met. The number of outstanding actions have increased this quarter (an additional 29) mostly due to the *Development & Implementation of the Commercial Framework* audit which was graded Limited which resulted in 27 actions that meet the monitoring threshold. The leads for this report have provided a one page

brief detailing how these areas of risk will be addressed. This can be found in Appendix A.

Professionalism continue to make progress in addressing their recommendations and now have 14 outstanding. 13 of these relate to the Training transformation programme and are expected to be addressed as part of this longer-term programme.

Open actions by business group and Quarter due delivery date:



In the graph above, those shown to the right of the dotted line are within the quarter due date, all others have past the original due date.

Based on quarters, Corporate Services have 13 actions overdue. 7 of these (due October 2020) relate to actions from the *Framework Supporting Data Protection Compliance* audit. The remainder of the outstanding actions (45) are within their agreed delivery date, but corporate services should be mindful that 20 of these actions are due within quarter 3 therefore where possible every effort should be made to complete these within the agreed deadline. There is now only one action remaining from the Limited *MPS Counter Fraud Arrangements* follow up which demonstrates the commitment in ensuring identified risk areas are addressed.

All of the outstanding actions for Professionalism are now past their original due date, however 13 of the 14 (92%) of these relate to training and form part of the Learning and Development Transformation programme. They will remain included in the quarterly figures but there will be a reduction in the frequency of requests for updates given the long-term nature of the programme.

Current position – 10th November 2021

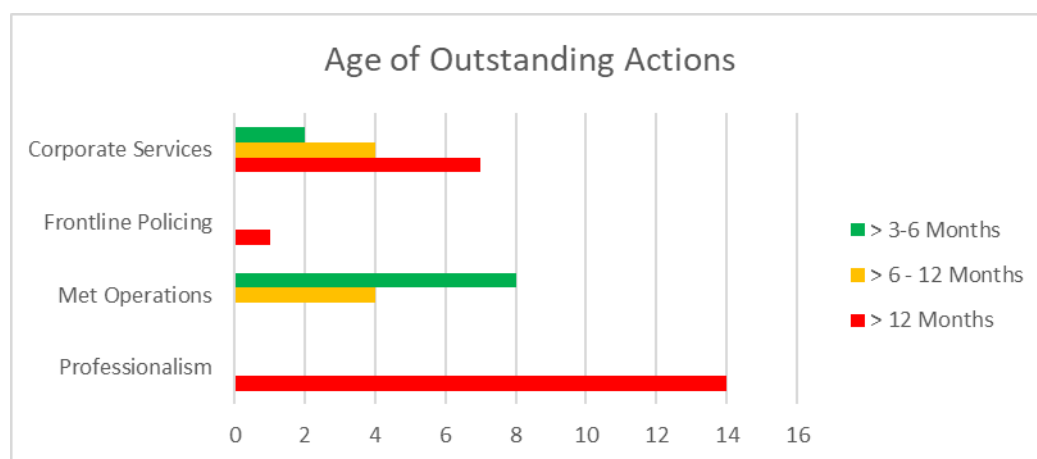
Business Group	Actions past due date (Q2)	
	Total actions outstanding	% overdue (due date)
Corporate Services	58	29%
Digital Policing	7	100%
Frontline Policing	4	25%
Met operations	12	100%
Professionalism	14	100%

We agreed with DARA that we would actively encourage action owners to provide expected completion dates for outstanding actions past their due date, so we focus less on what we didn't manage to achieve and provide a renewed focus on achieving the revised due dates.

Business Group	Actions past due date (Q2)			
	Number Overdue Actions	Number overdue actions with expected completion date	% overdue (based on expected completion date)	% overdue without expected completion dates
Corporate Services	17	11	29% (5)	27% (6)
Digital Policing	7	0	0% (0)	100% (7)
Frontline Policing	1	1	25% (1)	100% (1)
Met operations	12	12	17% (2)	8% (1)
Professionalism	14	14	0% (0)	0% (0)

We now have 51 (39 High priority, 12 Medium) outstanding actions past their original due dates, (up from 47 last reporting quarter). Leads have proposed revised implementation dates for those actions where we are confident that appropriate activity has been identified and plans are in place to address the outstanding risks (37 of the 51). Strategy and Governance will continue to work with the business to obtain realistic revised expected completion dates together with the reasons for the delay. This can be used to provide analysis of why we are missing agreed due dates and a better picture of when recommended activity will be in place. We will also assist with guidance on local action planning and monitoring to ensure where possible the future due dates are achieved.

There continues to be a reduction in the number of significantly older actions (based on due date). The chart below includes those actions within Professionalism that form part of the Learning transformation programme.



Delays in meeting due dates

As part of the quarterly update we have the option for 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 and identify any emerging themes we continue to review the delay reasons of both currently delayed and delivered (but delayed) actions.

The most frequently cited reason for a delay for all actions (outstanding and delivered) is updating policy and guidance (31). However when looking at the current picture for outstanding delayed actions (34 of 51 responses), this relates to just 3. Any impact of COVID-19 on the ability to deliver actions has now been addressed and no longer appears as a reason.

The largest number (8) is that the action is dependent on another review, either internal or external. Identifying these pinch points will allow us to review when appropriate if there are delays occurring as part of our corporate processes.

Delay reasons for current actions

Delay Themes	Total
Dependent on another review (internal/External)	8
Embedding new process, policy or governance	7
Included as part of a wider transformation programme	5
Updating Policy and guidance	3
Effectiveness of solution under review	2
Project delay	2
Requires a new IT solution	2
Resource challenges	2
Ambitious completion date	1
Partnership/Multi-agency challenges	1
Recruitment	1
Grand Total	34

Key Audit Themes

We have aligned the key themes arising from the audits with the DARA auditor descriptors. We continue to regularly meet with DARA to ensure our reporting reflects current audit practice.

This should allow us to gain more insight into specific issues and identify activities to address these moving forward. Across all actions (outstanding and delivered), a thematic analysis draws out the following recurring themes in terms of risks identified.



The three predominant themes are Policy and Process, Management Oversight and Capability and Capacity.

When looking at the themes for current outstanding actions Assurance, Management Oversight and Reporting and accountability become the thematic problem areas.

Assurance	24	25%
Management Oversight and Reporting	17	18%
Accountability	15	16%
Capability and Capacity	14	15%
Policy and Process	14	15%
Risk Management	6	6%
Strategy Definition	5	5%
Grand Total	95	

The risk themes for current outstanding actions have been broken down into business areas and shared with audit owners. When viewed as a collective there are additional themes and commonalities that are over- reaching across several, if not all business groups. These have been fed in to our work on the Annual Governance Statement and Governance Improvement Plan.

Strategy and Governance will work with the business to implement the action plan arising from this year’s Risk maturity assessment which includes reviewing the effectiveness of existing assurance processes and implementing them where required. We will continue to work with business groups at a local level to identify where activities or improvements to existing processes can minimise risk in these areas.

New Audits received since last board

Since the last board, we have received the findings from the following audits:

- **Audit** – Development and Implementation of the Commercial Framework (graded – Limited)

- **Follow Up** – Gun Crime – Resources, Deployment & Capability (graded – Adequate)
- **Follow Up** – Environment & Sustainability Management (Impact of investment decisions on the environment) (graded – Adequate)
- **Follow Up** - Management of Police Officer Overtime (graded – Adequate)

The *Development & Implementation of the Commercial Framework* audit was graded limited. The leads for this audit briefed Risk and Assurance Board of current and planned activity to address the audit risks and recommendations and provided assurance on the way ahead for this area.

It was agreed at board that as Strategy and Governance have yet to receive the Domestic Abuse, Management and Deployment of Resources (incl. Investigations Framework) a limited audit one page brief would be presented at the next Risk and Assurance board in March.

Risk and Assurance board monitor the improvements between the point of initial Limited audit and the follow up. The leads for a limited audit present a summary of existing and future planned activity and should the follow up remain Limited, a paper is required to board detailing why the audited area has not seen improvements. Progress against each action is captured by the team within Strategy and Governance.

3 HMICFRS update

Overview

Since HMICFRS resumed appreciable inspection activity in September 2020, the Met has received 12 inspections; we have been notified of a further two inspections between January – March 2022 that are in addition to our PEEL assessment fieldwork. A number of the inspections have the similar theme in relation to trust and confidence i.e. counter-corruption, vetting and dealing with misogynistic and predatory behaviour.

PEEL assessment

HMICFRS has continued to evaluate the PEEL continuous assessment approach to support their own improvements. Consultation with forces, NPCC, the PEEL External Reference Group and other interested parties the approach has informed a revised approach which the HMICFRS Board has now agreed.

The changes will alter certain areas and remove other PEEL question areas; they will not stop inspecting them but change the way in which the inspection activity is undertaken with the aim of reducing demand on forces.

Q1 - Victim Service Assessment – remains within PEEL but the victim's experience will be a narrative assessment within the report but the evidence gathered will be used for making judgments in other questions. The Crime Data Integrity element (every three years) will receive a graded judgement, not the whole VSA.

Q8 - Disrupting serious organised crime – this question is being removed from PEEL as SOC will become a regional inspection, incorporating the ROCU and constituent forces. There will be a force judgment / narrative and a ROCU judgment / narrative. It is yet to be determined how London (Met, City of London and BTP) will be inspected given that there is no formal ROCU arrangement however we are aware that the earliest we can expect the inspection is autumn 2022.

Q9 & Q10 - Strategic Policing Requirements & Armed Policing - both of these areas are currently ungraded questions within PEEL. In future, they will be inspected via a thematic approach, and will be removed from the PEEL report.

Q11 - Ethical, lawful & inclusive workforce - in future, the Counter Corruption Unit, Professional Standards Department and vetting elements of the Workforce question will be inspected as a national thematic. Promoting an ethical and inclusive culture, wellbeing, and building and developing a workforce for the future will remain within the PEEL Workforce question.

Q12 - Planning, management & VfM - there will not be any changes to the inspection methodology, but HMICFRS will make better use of Force Management Statements and other information available to them to streamline the document request.

Victim Service Assessment and Crime Data Integrity audit

Our tier 3 notification was received on 27 September; this confirmed the VSA would include the CDI audit. This took place 15 – 19 November and consisted of a sizeable document request and review of c.900 incidents across a number of categories including calls into MetCC.

Due to the prevalence of HMICFRS inspection activity related to two commissions from the Home Secretary, PEEL activity is not overtly being completed. However, where evidence for PEEL is presenting itself during these inspections, our Force Liaison Lead is capturing it.

We have received confirmation that PEEL fieldwork will take place 21 February – 18 March 2022. Whilst all the PEEL questions (subject the changes noted above) will be inspected, HMICFRS have identified the following as priority areas (in order of their priority):

- Q6 - Vulnerability
- Q11 - Ethical, lawful & inclusive workforce
- Q2 - Public treatment
- Q5 – Investigations
- Q7 - Managing offenders & suspects

A strategic briefing will be delivered w/c 14 February 2022 (date to be confirmed).

Thematic Inspections

Forthcoming inspections

Serious Youth Violence (lead Cmdr Alex Murray)

A joint thematic inspection will take place in 12 forces in early 2022 (10 with a Violence Reduction Unit and two without). HMICFRS are the lead inspectorate, joined by HMI Probation, Ofsted and CQC; the Met's fieldwork will take place 31 January – 4 February 2022.

This inspection will examine the capability and capacity of forces to address serious youth violence and will consider how well police respond to violent crime involving young people, particularly between the ages of 14 to 24 years. It will assess:

- i. How well the police address serious youth violence, investigate and support victims including where racial disproportionality may be a factor;*
- ii. How effective and efficient the police are at working with partners to implement the serious violence strategy, including a public health approach;*
- iii. How police led enforcement activities are supportive of partnership activities; and*
- iv. How efficient and effective Violence Reduction Units are at reducing serious youth violent crime.*

A detailed document request was completed on 5 November. The inspection will involve interviews with strategic and tactical staff, partner agencies, focus groups and some reality testing. This inspection will involve on-site and remote inspection working.

Joint inspection of Multi-Agency Public Protection Arrangements – NW BCU (lead Cmdr Alison Heydari)

A joint thematic inspection led by HMI Probation (involving HMICFRS and HMI Prisons) into the effectiveness of Multi-Agency Public Protection Arrangements (MAPPA) will take place w/c 7 February 2022.

The thematic inspection aims to assess the effectiveness of police forces at managing within the MAPPA partnership processes, potentially dangerous offenders. The inspection scope will include areas such as; leadership, training & guidance, partnership working, information sharing, compliance with legislation & guidance, and ultimately the effectiveness of this form of offender management.

For such inspections, HMI Probation focus on a specific probation area and in this case the focus is upon Harrow & Barnet. HMICFRS's element of the inspection - requests for interviews, documents and data, will be for cases specific to NW BCU.

Previous inspections

An assessment of current vetting and counter- corruption capacity and capability in policing across England & Wales – to include forces' ability to detect and deal with misogynistic and predatory behaviour (Lead AC Helen Ball)

This national thematic inspection is considering whether the police are effective in ensuring that those individuals, including probationers, who are not fit to serve in policing are neither recruited nor remain in the service. The inspection terms of reference are:

- i. *How effective are current vetting standards and how well do forces identify the correct vetting levels of officers and staff and vet and re-vet them in accordance with the requirements of their roles?*
- ii. *How effective are the vetting arrangements for police officers and staff seeking to transfer from one force to another?*
- iii. *How effectively do forces prevent, manage, understand, and investigate potential corruption among their police officers and staff?*
- iv. *How effectively do forces identify, prevent, detect and deal with prejudicial and improper behaviour based on gender by their police officers and staff?*

The fieldwork for this inspection will take place in seven forces through to March 2022. The Met was the first force to be inspected w/c 29 November.

This Home Secretary commission has significant crossover with the recently concluded Counter Corruption / Op Drayfurn inspection, which broadly covers the first three questions; all relevant evidence already collated informed this inspection. The fourth question was the principal focus of the Met's fieldwork, which included strategic interviews and focus groups, to ensure that all parts of this commission were covered.

Counter Corruption / Op Drayfurn (lead DAC Barbara Gray – reporting into the Deputy Commissioner)

The terms of reference for this inspection altered slightly during the fieldwork phase:

1. How well does the MPS prevent, manage, understand, and investigate, potential corruption?
2. How effective was the MPS' organisational learning response to the Daniel Morgan independent investigations and reviews?
3. How appropriately did the MPS respond to the independent panel's requests for disclosure and access to material?

Formal on-site evidence gathering activity took place in the Vetting Unit and within the Anti-Corruption Command in early September. Inspection fieldwork began on 27 September and concluded on 5 November. During the inspection, HMICFRS conducted a significant amount of reality testing across eight OCU/BCUs and held c.20 strategic interviews.

At the time of writing, HMICFRS are scheduled to reported their high-level findings to the Home Secretary before Christmas 2021; the final report is unlikely to be published until February 2022.

CT6 (lead AC Matt Jukes)

This thematic inspection, the latest in Counter Terrorism programme took place 11-15 October and considered "*how well prepared is the police service to respond to a terrorist CBRNE incident.*" We expect to receive the draft report for a factual accuracy checks in late February 2022; this report is unlikely to be published publically.

National child protection inspection (lead AC Nick Ephgrave)

The final report was published on 1 September. HMICFRS reported that the Met would now resume 'routine monitoring' as part of the usual cycle of evaluation for the National Child Protection Inspection programme. However, as part of the PEEL inspection fieldwork in February 2022, they will look at progress made since the NCPI inspection (which was held in January & February 2021) and will instigate closer scrutiny if needed.

HMICFRS Monitoring Portal

Current position

The Monitoring Portal holds all recommendations and now areas for improvement (AFI) identified from inspections from 2018 onwards.

With new reports added over the quarter, the Monitoring Portal currently shows 127 open recommendations and 30 open AFIs. This is a reduction of 20 recommendations since the last report.

This quarter a further 8 recommendations and 6 AFIs and have been submitted to HMICFRS for review for closure.

As part of the 12-month continuous improvement approach for the PEEL inspection, our Force Liaison Lead and Inspection Officer continue to review all previous PEEL entries and the most recent updates presented.

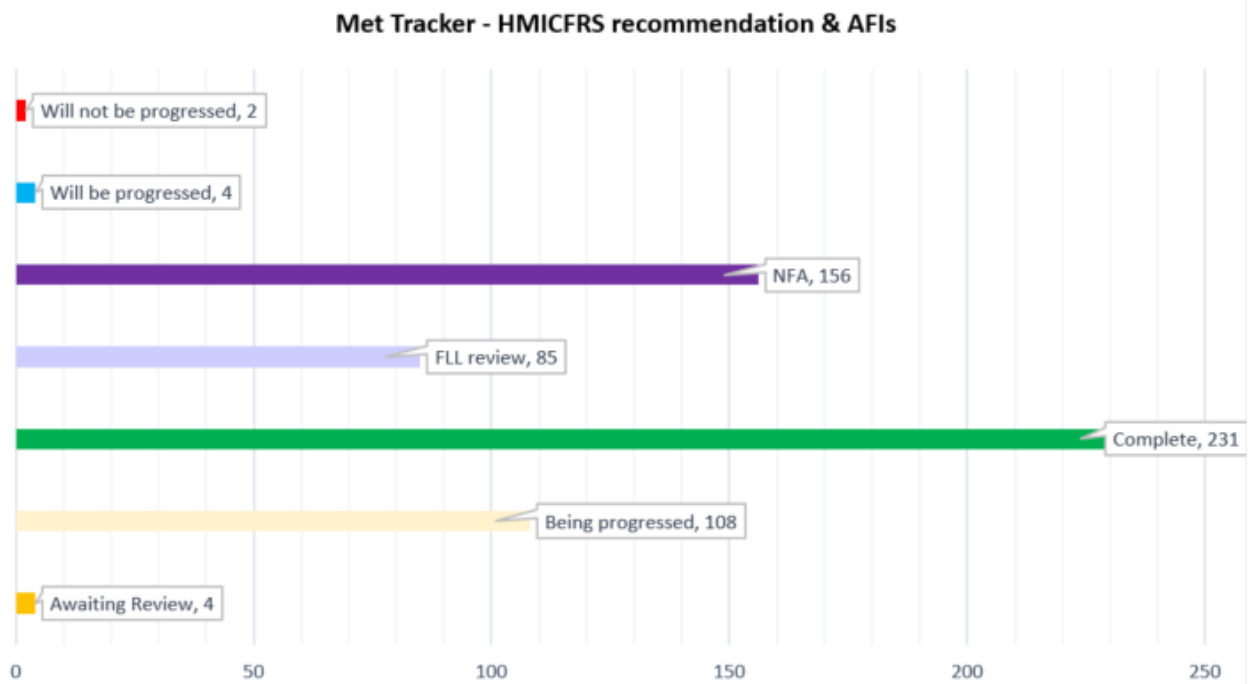
Inspection theme	Total Recs	Total AFIs
Vulnerability (including 13 specifically related to the NCPI programme and 3 from a super complaint)	69	0
PEEL	10	19
Stop & Search	7	0
Information management	1	0
Betrayal	3	0
Fraud	2	4
Cyber	0	1
Police Collaboration	1	0
Pandemic	5	0
Bail	2	0
Immigration (Super Complaint)	4	0
Integrated Offender Management	4	0
Protests	2	3
Roads	6	3
Police Integrity & Corruption	3	0
Regional Organised Crime	2	0
Online	6	0
Total	127	30

As previously reported, HMICFRS will not formally close any entries on the Monitoring Portal until they are satisfied the recommendations against causes for concern or area for improvements have been fully met; this is usually when it can be tested by way of

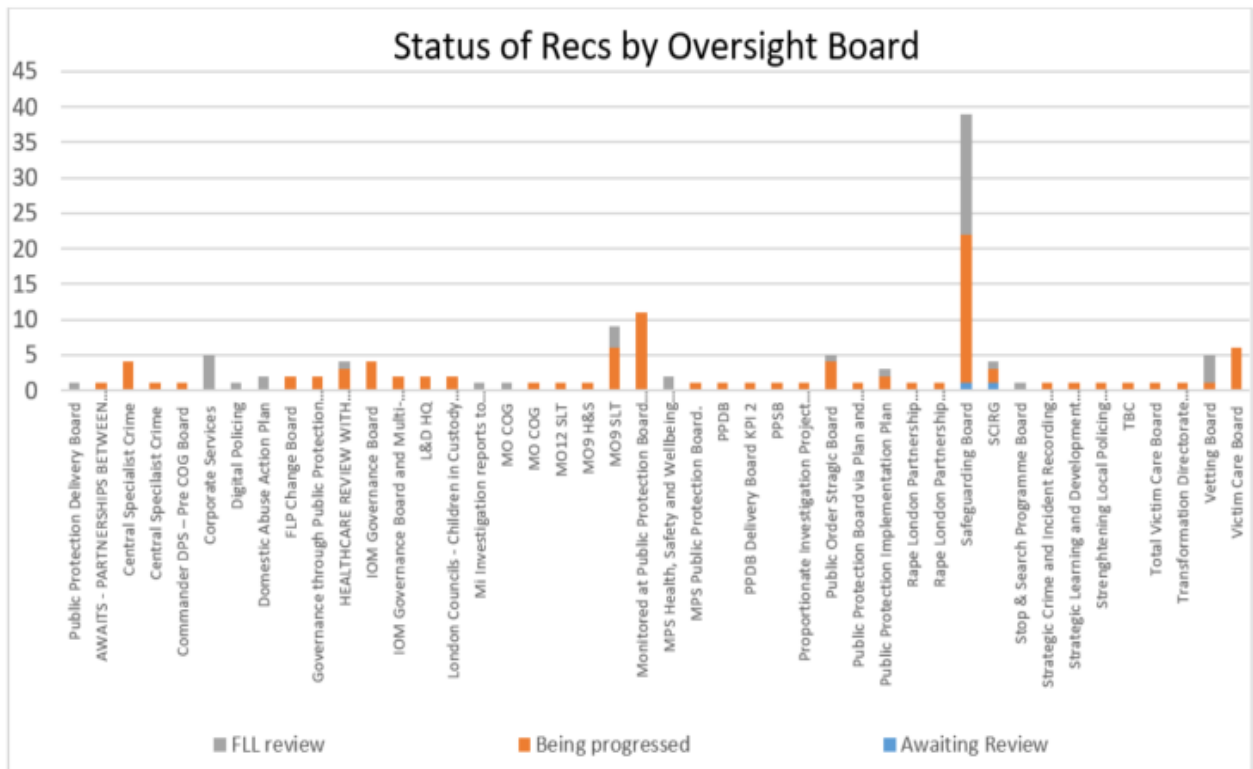
an inspection. PEEL recommendations and AFI will not be closed until after the PEEL fieldwork in February 2022.

Met Tracker – HMICFRS recommendations & AFIs

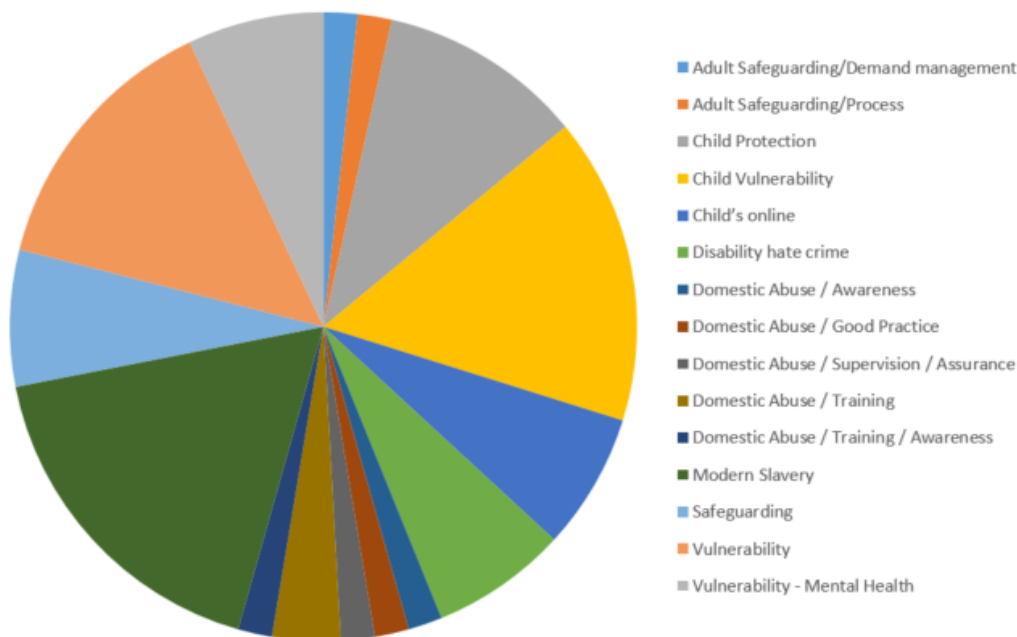
The graph below provides a breakdown of different categories in relation to all recommendations / AFIs position as they appear on the Met tracker (including those that are National recommendations i.e. not for forces to address – shown as NFA below). Out of the 157 open on the Monitoring Portal we assess that 85 are closed – these have been sent to HMICFRS for review and closure and we await their confirmation to move them to ‘complete’ status.



We have engaged with leads to determine which governance boards oversees and drives activity to implement recommendations and AFIs and 43 different governance boards were identified (one is still to be confirmed).



Recommendations reviewed at Safeguarding / Public Protection Board



We will continue to develop this analysis in order to provide each governance board with their respective recommendations and AFIs. This will support the earliest implementation possible, which is part of our work across the Met to rebuild trust.

4 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.

5 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.

6 Legal Implications

There are no direct legal implications arising from this report.

7 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.

8 Contact Details

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

9 Background papers:

None